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Situational Analysis on the Rights of Persons with Disabilities in Ukraine

Country Full Report





Report: Situational analysis on the rights of persons with disabilities in Ukraine

Finalised March 2025.



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DISCLAIMER:

The data and analyses presented in the report are based on the situational analysis conducted at the country level and were drafted by participating UN agencies, with the support of international and national consultants. The UNPRPD/Global Disability Fund has not edited the report or verified the findings for accuracy. This report does not necessarily reflect the position of the UNPRPD/Global Disability Fund.



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Table of Acronyms

ADTWG	Age and disability technical working Group
CCCM	Camp Coordination and Camp Management (CCCM) Cluster
CMU	The Cabinet of Ministers of Ukraine
CSO	Civil Society Organization
IASC	Inter-Agency Standing Committee
ICCG	Inter-Cluster Coordination Group
ICF	International Classification of Functioning, Disability and Health
IDP	Internally displaced persons
Government Commissioner	The Government Commissioner on Rights of Persons with Disabilities
HNRP	Humanitarian Needs and Response Plan
MoE	Ministry of Education
MoH	Ministry of Health of Ukraine
MoSP	Ministry of Social Policy of Ukraine
MSNA	Multisectorial Needs assessment
MSEC	Medical and Social Expert Commission
Ombudsman	Ukrainian Parliament Commissioner for Human Rights.
OPD	Organisation of Persons with disabilities
PCC	Physician Consultation Commission
Shelter/NFI	Shelter and Non-Food Items
SitAn	Situational Analysis
SDGs	Sustainable Development Goals
UNCRPD	Convention on the Rights of Persons with Disabilities
UNCT	UN Country Team
UNFPA	United Nations Population Fund
UNPRPD	Partnership on the Rights of Persons with Disabilities.



Executive summary

Ukraine has made notable progress in implementing the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), including the development of “The National Action Plan on Implementation the UN Convention on Rights of Persons with Disabilities till 2025” and “the National strategy for creating a barrier-free environment in Ukraine till 2030”. The Strategy and the National Plan (the one section of the National Plan directly related to Article 9 of UNCRPD) aim to improve accessibility in transportation, information, and infrastructure while engaging diverse stakeholders, including Organizations of Persons with Disabilities (OPDs). The accession to the Marrakesh Treaty (signed in 2023) further underscores Ukraine's commitment to enhancing the rights of persons with disabilities. However, the ongoing war has significantly exacerbated existing inequalities, hindering these advancements and creating new challenges for persons with disabilities, older adults, women-headed and women-only households, and marginalized communities.

This Situational Analysis (SitAn) was developed to evaluate the status of human rights for persons with disabilities within the frame of the CRPD in Ukraine and identify gaps in its implementation amidst the current humanitarian crisis. The analysis follows UNPRPD SitAn guidance for humanitarian contexts and is informed by a participatory process that included partnerships with OPDs and validation sessions with persons with disabilities and other stakeholders. Data collection involved desk research, stakeholder consultations, and validation sessions, with a focus on highlighting the disproportionate impact of the war on persons with disabilities. The findings aim to inform recommendations for improving systems, structures, and policies to advance disability rights and align them with the UNCRPD.

KEY CHALLENGES

Persons with disabilities in Ukraine face numerous challenges exacerbated by the ongoing armed conflict, systemic inefficiencies, and social barriers. These challenges create a complex landscape that hinders progress toward a fully inclusive, rights-based approach.

1. Limited Representation of OPDs:

Persons with disabilities and their representative organizations face significant barriers in participating in decision-making processes. The national legal definition of OPD is not fully complying with the UNCRPD.

2. Fragmented coordination mechanisms:

Many coordination mechanisms remain physically and communicationally inaccessible, limiting meaningful participation and representation. Specific subgroups, such as people with intellectual and psychosocial disabilities, are particularly underrepresented in consultations and excluded from critical services. In addition, the coordination mechanisms are fragmented between different levels (local – regional – national) as well as between government established mechanism, like the barrier free council, the overall UNCRP implementation led by the MoSP, the specific strategies developed by ministries while coordinated by the barrier-free council as well as the human-rights mechanisms. Somewhat parallel the humanitarian response in addition to SDG and EU accession processes are involved in CRPD coordination aspects.

3. Impact of Armed Conflict:

The destruction of infrastructure, displacement of trained professionals, and increased rates of trauma-related disabilities have placed unprecedented strain on Ukraine's support systems. These



factors have severely disrupted access to essential services, and humanitarian aid, further marginalizing persons with disabilities and undermining progress toward implementing the UNCRPD.

4. Fragmented Governance Systems and Legal Frameworks:

Parallel governance systems created by ongoing reforms, as shown in the chapter Inclusive Services and Accessibility, have led to confusion and inefficiencies, complicating efforts to transition from institutional care models to community-based solutions. Additionally, Ukrainian legislation heavily relies on the medical model of disability, perpetuating stigma and discrimination. Anti-discrimination laws lack robust enforcement mechanisms, while inconsistencies in policies related to education, employment, and accessibility hinder the effective implementation of inclusive practices.

5. Data Deficiencies:

The lack of comprehensive and disaggregated data on persons with disabilities impedes effective policymaking, resource allocation, and inclusive programming.

6. Barriers to Accessibility and Services:

Public infrastructure, transportation systems, and emergency shelters often fail to meet accessibility standards. This deficiency, coupled with underdeveloped inclusive education, employment opportunities, and healthcare, leaves many persons with disabilities without the support needed to lead independent lives.

7. Social Stigma:

Persistent stereotypes and attitudinal barriers, particularly against individuals with intellectual and psychosocial disabilities, perpetuate exclusion and hinder progress. These stigmas limit the adoption of a rights-based understanding of disability across sectors.

RECOMMENDATIONS

To address the identified challenges and foster a more inclusive society, targeted actions must be taken to uphold the rights of persons with disabilities, particularly during the ongoing humanitarian crisis. The following recommendations aim to guide stakeholders in aligning their efforts with the UNCRPD and promoting sustainable recovery and development:

1. Strengthen Governance and Coordination

A centralized, multi-sectoral mechanism should be established to coordinate efforts across the humanitarian, recovery, and development phases, ensuring consistency and inclusion. Enhancing the participation of Organizations of Persons with Disabilities (OPDs) in policy-making at both national and local levels is essential. This requires capacity-building initiatives and the removal of barriers to foster meaningful participation.

2. Legislative and Policy Reform

Anti-discrimination laws must be revised to strengthen enforcement mechanisms and expand protections for persons with disabilities. A shift from the medical model to a functional model of disability assessment is necessary to promote inclusion and autonomy. Additionally, all new legislation should align with



UNCRPD principles, with a particular focus on education, employment, and healthcare sectors as well as reviewing legal capacity regulations to ensure comprehensive inclusion.

3. Improve Accessibility

Adherence to accessibility standards and the monitoring thereof should be prioritized in the (re-) construction of public buildings, transportation systems, and emergency shelters. Inclusive education and employment programs tailored to the needs of persons with disabilities (e.g. application of reasonable accommodation), especially marginalized groups, such as persons with intellectual and psychosocial disabilities, Deaf Blind persons or persons with multiple disabilities must be developed to address persistent barriers and promote equal opportunities.

a) Build Capacity and Raise Awareness

Training programs should be implemented for government officials, humanitarian actors, and service providers to enhance their understanding of disability rights and inclusion practices. Public

awareness campaigns are critical to combating stigma and fostering a rights-based understanding of disability within society.

4. Enhance Data Collection and Monitoring

Standardized tools should be developed for collecting disaggregated data on persons with disabilities across sectors. Clear indicators must be established to effectively measure the impact and success of disability-inclusive policies and programs, enabling evidence-based decision-making and resource allocation.

Enhance compliance under Article 33 UNCRPD through amending the Law on Ombudsman to and put the responsibility of CRPD monitoring to the Ombudsman. Thus, strengthening the capacity of the office as well as ensuring OPDs participation in monitoring UNCRPD and preparation special Reports.

CONCLUSION

The ongoing conflict in Ukraine has amplified the vulnerabilities of persons with disabilities, intensifying existing inequalities and creating new barriers. Systemic gaps in addressing their rights and needs have been highlighted, underscoring the urgent need for coordinated and inclusive action. While notable progress has been made, significant challenges remain in ensuring that the voices and needs of persons with disabilities are prioritized in recovery and development efforts.

Despite these challenges, opportunities exist to build a more inclusive, rights-based framework. Strengthening disability rights frameworks, addressing systemic gaps, and ensuring meaningful participation of persons with disabilities and their representative organizations are essential to upholding the UNCRPD and achieving sustainable development goals. This requires collective action from government bodies, OPDs, civil society, donors, and international organizations.

By fostering stronger coordination, aligning policies with international standards, and committing to inclusive and sustainable solutions, Ukraine can advance towards a barrier free society where no one is left behind. Ensuring the dignity, rights, and full participation of persons with disabilities during and after the crisis will be critical to creating a more equitable and resilient future for all.



Background

“The Committee is deeply disturbed that the fate of people with disabilities in Ukraine is largely unknown. There are ongoing reports that many people with disabilities, including children, are trapped or abandoned in their homes, residential care institutions and orphanages, with no access to life-sustaining medications, oxygen supplies, food, water, sanitation, support for daily living, and other basic facilities.”¹

(Committee statement 2022)

Ukraine signed the Convention on the Rights of Persons with Disabilities (CRPD) on 24 September 2008 and ratified it on 16 December 2009 through the Verkhovna Rada, the Ukrainian Parliament. The country acceded to the treaty without declarations or reservations, with strong advocacy support from Organizations of Persons with Disabilities (OPDs). This Situational Analysis (SitAn) identifies gaps and provides recommendations to address these gaps, focusing on implementing the CRPD during and after the war that began in 2014 and escalated with the full-scale invasion in 2022.

Since the onset of the conflict, the situation for the general population has deteriorated significantly, resulting in a humanitarian crisis. Vulnerable groups, including persons with disabilities, older adults, Roma communities, and women-headed households, have been disproportionately affected. Addressing their specific needs requires inclusive, targeted responses², ensuring access to humanitarian corridors, inclusive evacuation and crisis response plans, and accessible emergency information and communication. These issues have been highlighted by OPDs and coordination mechanisms such as the Protection Cluster and the Age and Disability Technical Working Group (ADTWG), supported by the WHO disability-inclusive humanitarian action advisor hosted in the Inter-cluster coordination Group (ICCG), led by OCHA. Despite efforts, challenges persist, including limited inclusive humanitarian action, inadequate participation, insufficient data collection, and persistent barriers.

Evacuation approaches and transit sites remain segregated, with increasing institutionalization of persons with disabilities and older adults³, especially in facilities near the frontline, which are exposed to significant risks⁴. The full-scale invasion caused widespread displacement, destruction of infrastructure, and a shortage of skilled personnel, further straining economic resources⁵. Despite these challenges, the Government of Ukraine (GoU) continues to implement the CRPD. However, the UNCRPD Committee's 2024 observations highlighted that the lack of adequate measures to protect and support persons with disabilities during emergencies has exacerbated their vulnerabilities⁶.

The Humanitarian Needs and Response Plan (HNRP) for 2024 estimated that 14.6 million people are in need (2023: 17.6; 2022: 17.7⁷), including 14% who are persons with disabilities⁸, 20% who are children, and 23% who are older adults⁹. Among internally displaced persons (IDPs), 68% are women-headed households, with 66% of these households having at least one member at risk of

1. OHCHR 2022: <https://www.ohchr.org/en/statements/2022/04/ukraine-27-million-people-disabilities-risk-un-committee-warns>

2. Ibid.

3. Experience reported by the disability advisor (WHO).

4. UN disability report 2020.

5. HNRP 2024 Ukraine: <https://reliefweb.int/report/ukraine/ukraine-humanitarian-needs-and-response-plan-2024-december-2023-enuk>

6. Concluding observation on the combined second and third periodic report of Ukraine. Access [here](#)

7. Data per year see under here: <https://humanitarianaction.info/plan/1102>

8. Identified of persons with disabilities 2024 by Ukrainian certification as well as application of WGQ-SS. People in need identification done as per JIAF 2.0 guidance in accordance with HCT and ICCG during the HPC process: <https://data.humdata.org/dataset/ukr-jiaf-humanitarian-needs-and-response-plan>

9. HNRP Ukraine 2024, p. 4. Accessed [here](#)



disabilities¹⁰. Households with members who have disabilities are three times more likely to face severe or extreme needs across multiple sectors, compared to 7% of households without disabled members¹¹. The 2024 data indicates severe needs in protection, health, food, and livelihoods for these households¹², confirming that disability, age, and gender are key drivers of humanitarian needs^{13 14}. Overall barriers such as limited income, heightened health needs, and insufficient access to information and humanitarian services due to lack of adaptation as well as registration compound these challenges¹⁵.

The GoU faces additional constraints due to the war, including damaged public infrastructure, staff shortages, and economic strain, which affect service quality nationwide. As of 2023, Ukraine's population was 37 million, per the World Bank¹⁶, but the Ministry of Social Policy (MoSP) reported 35.5 million by early 2024, with 4.1 million residing in temporarily occupied territories¹⁷. The EU Council forecasts a population decline of 24–33% within several years after the war, reflecting significant demographic shifts, including reductions in the youth and working-age populations¹⁸. This projection aligns with a 2024 United Nations Population Fund (UNFPA) report, which estimates that the number of people living and working in Ukraine has decreased by 10 million since 2014 (the beginning of the Russian aggression)¹⁹. Decentralization efforts initiated before the invasion²⁰ have been hindered under martial law, reducing financial resources at local levels. Government and OPDs consultations emphasize the need for ownership, resources, and awareness at Oblast (regional) and Hromada (local self-governance level)

The war has also resulted in an increase in trauma and severe injuries, with the Medical and Social Expert Commission (MSEC) issuing 145,000 new disability certifications in 2023 based on official statistics²¹, however concrete numbers do vary. As of early 2023, Ukraine reported 2.72 million persons with disabilities, including 156,000 children²², though the actual number may be higher due to the war and the persistence of medical-model classification systems.

Since ratifying the CRPD (2009), Ukrainian legislation has continued to use outdated terminology, referring to persons with disabilities as 'invalids,' based on the Russian translation of the CRPD (Ukrainian CRPD title: Конвенція про права інвалідів)²³. This terminology was reflected in legislation, such as the Law of Ukraine 'On Rehabilitation of Invalids in Ukraine,' during the period 2006–2017²⁴. Currently, all legal documents in Ukraine use the official legal term 'person with invalidity.' The continued reliance on the medical model is evident in the definition of invalidity, which is described as “a measure of health loss due to disease, trauma (or its consequences), or inherited defects that, in interaction with the external environment, may result in limitations to life activities. Consequently, the state must create conditions enabling the person to exercise their rights on an equal basis with other citizens and ensure their social protection.”²⁵ The status of 'person with a disability' is determined through certification under this model, limiting public discussions on disability rights and statistics to those officially certified, while excluding individuals without certification. However, a shift toward a broader approach is gradually emerging

10. In comparison to female-headed HH that have e.g. a partner at the frontline, leading to 2 heads of HH with income and other military support. The identification has been done with WGQ-SS, which is why 'at risk' is used.

11. MSNA: gender, age and disability snapshot. Accessed [here](#)

12. MSNA 2024 data, not published at time of writing, but shared during REACH cluster, GiHA and ADTWG presentations.

13. Showing higher vulnerabilities within intersecting identities as raised during OCHA civil society consultation (Sept. 2024), eg. Roma, LGBTQI+ communities as well as within the diverse group of persons with disabilities.

14. MSNA: gender, age and disability situational overview, Jan. 2024. Accessed [here](#)

15. MSNA 2024 data: not published at time of writing.

16. Worldbank Group Data Ukraine: <https://data.worldbank.org/country/ukraine?view=chart>

17. The information was published by the Ministry of Social Policy during a strategic session on 2 May 2024.

18. The socio-demographic situation in Ukraine: ways to overcome the consequences of the war. Link [here](#)

19. UNFPA (2024): Ukraine's demographic challenges deepen amidst ongoing war. Article [here](#).

20. <https://www.kmu.gov.ua/reformi/efektivne-vryaduvannya/reforma-decentralizaciyi>

21. Third Rapid Damage and Needs Assessment (RDNA3) February 2022 – December 2023. Ukraine. Link [here](#)

22. Social security of Ukraine population (2022): https://www.ukrstat.gov.ua/druk/publicat/kat_u/2023/zb/10/zb_szn_2022.pdf

23. See UKR translation of the UNCRPD here: https://zakon.rada.gov.ua/laws/show/995_g71/ed20061213#Text

24. Version of 2017 of the rehabilitation law: <https://zakon.rada.gov.ua/laws/show/2961-15/ed20170807#Text>

25. Version of 2017 of the rehabilitation law: <https://zakon.rada.gov.ua/laws/show/2961-15/ed20170807#Text>



(see the Assessment chapter for more details). While the authors acknowledge this limitation, in the SitAn, the term 'persons with disabilities' is applied in alignment with the UNCRPD. Accordingly, the identified barriers and recommendations aim to include all persons with disabilities, including those without official certification.

The current situation presents significant challenges for Ukrainian authorities in ensuring protection, sustaining reforms, and maintaining financial and human resources for CRPD implementation. This SitAn acknowledges these challenges, highlighting government progress while identifying gaps raised by OPDs, government agencies, and UN entities. These findings inform the UN Country Team (UNCT) recommendations to prioritize and support the rights of persons with disabilities across stakeholders in the current context.

Approach

Guiding Principles

This Situational Analysis (SitAn) follows the guidance for humanitarian contexts²⁶, focusing on the current situation in Ukraine since the onset of the full-scale armed conflict in 2022. The analysis considers the roles and responsibilities of the Government of Ukraine (GoU) while accounting for constraints on financial and human resources. It emphasizes the disproportionate impact of the humanitarian crisis on persons with disabilities, who face heightened vulnerabilities. As noted earlier, it is expected that the number of persons with disabilities will increase as a direct result of the conflict²⁷.

A central guiding principle of this SitAn is the partnership with and active participation of Organizations of Persons with Disabilities (OPDs). During the Joint Program Phase 2 - Inception Phase, key partnerships were established with three national OPDs²⁸: *Fight for Rights (FFR)*, *League of the Strong (LotS)*, and the *National Assembly of Persons with Disabilities (NAPD)*. These OPDs were funded to co-author sections of the report, analyze challenges, develop recommendations, organize and facilitate validation sessions with persons with disabilities, and review draft versions of the report. Additional partnerships were formed with two other OPDs: the *Ukrainian Society of the Deaf and Inclusion Ukraine* (a self-advocacy group for individuals with intellectual disabilities). These two OPDs were also supported to facilitate validation sessions and contribute to the report's review. Collectively, these five OPDs formed the Joint Program OPD Reference Group. Furthermore, a National Disability Rights Consultant, engaged by WHO, served as the technical lead for the report, collaborating closely with the three core OPD partners.

To ensure robust input and future-oriented perspectives, validation sessions were conducted with government and ministry representatives. These included the Advisor-Commissioner to the President of Ukraine on Barrier-Free Issues (who technically leads the National Barrier-Free Strategy), the Ministry of Social Policy (MoSP), the Ministry of Education (MoE), the Ministry of Veteran Affairs, the Ministry of Health (MoH), and the Parliamentary Ombudsman for Human Rights. Held in October and November 2024, these sessions focused on fostering collaboration. Additionally, validation sessions with UN focal points around disability inclusion, cross-cutting colleagues or program heads were conducted in early November 2024 to support the prioritization of recommendations.

26. UN PRPD guidance for conducting a situational country analysis of the rights of persons with disabilities in humanitarian contexts. July 2023.

27. Ibid.

28. NAPD and LotS can be considered representing the voices of their members. FFR acts as a network of activists and people with disabilities.



Methodology

DATA COLLECTION

The methodology for describing the human rights situation of persons with disabilities in Ukraine involved several stages and tools. These included desk research and online validation sessions with persons with disabilities all over Ukraine including conflict affected areas (i.e. Kharkiv, Dnipropetrovsk, Odessa, IDPs from Kherson). Additionally, three validations were conducted in person in the cities Chernivtsi, Kyiv and Poltava including people from rural areas.²⁹ The process began with primary data analysis derived from desk research to identify key challenges and gaps. These findings were then discussed and validated with persons with disabilities during subsequent sessions. The analysis followed these stages:

- Field stage of data collection: February to May 2024
- Validation sessions with OPDs: April to May 2024
- Drafting of the first report: June to August 2024
- Revisions: October to November 2024
- Information and discussion sessions with GoU and UN agencies: October to November 2024

DESK RESEARCH

The desk research phase involved identifying and analyzing key legislation, policies, and programs related to disability rights in Ukraine, particularly their compliance with international standards such as the CRPD. Data collection focused on comparing the pre-invasion and current situations. Key sources included:

- National legislation, strategic documents, policies, and programs addressing the human rights of persons with disabilities, particularly their alignment with the CRPD and the UN Committee's Concluding Observations.
- Official data on the status of persons with disabilities from Ukrainian authorities and UN agencies.
- Research conducted by OPDs, civil society organizations, international stakeholders, and public opinion polls.
- Alternative and shadow reports submitted to international and regional bodies.
- The Concluding Observations of the UN Committee on the Rights of Persons with Disabilities (October 2024), which served as a cross-cutting component of the analysis³⁰.

VALIDATION SESSIONS

A participatory approach was central to the methodology. Fourteen validation sessions, both in-person and online, were organized and facilitated by OPDs. These sessions engaged 132 persons with disabilities and 27 family members from 23 Oblasts, ensuring representation of under-represented groups such as women with disabilities, individuals with deafness, intellectual or psychosocial disabilities and those from rural areas or institutional settings. Veterans with disabilities and internally displaced persons (IDPs) with disabilities also participated.

29. The selection of participants has not been guided by geographical area or urban/rural. The key focus has been type of disability to ensure underrepresented groups are included. The reporting has been done according to urban/rural, sex, type of disability and age groups.

30. Committee on rights of persons with disabilities (2024): concluding observations. Access [here](#).



The sessions aimed to test identified challenges and gather suggestions on addressing them. A structured questionnaire with six open-ended questions was utilized (Annex 1), and a simplified language version was prepared for intellectual disabilities (Annex 2). Recommendations were informed by these findings and refined during three validation sessions with government ministries (Annex 3) and one with UN focal points (Annex 4).

Scope and Limitations

The full-scale invasion has significantly complicated the identification of persons with disabilities, particularly near the frontline, as many OPDs have relocated. A limited number of participants in the sessions were residents of frontline regions. To ensure safety during air alerts, seven sessions were conducted online, with three in-person sessions held in Poltava, Chernivtsi, and Kyiv. Direct consultations for persons with intellectual disabilities used simplified language and specially trained personal assistants, facilitated by the NGO Inclusive Ukraine.

The methodology had limitations. Participants were primarily OPD members, representatives, or family members, with no inclusion of persons with disabilities outside of OPDs. While the sessions reached many under-represented groups, Deafblind individuals, people with high support needs, and those representing national or LGBTQ+ communities were not included. Persons with disabilities living with HIV, those using injectable drugs, or recently released prisoners and persons with disabilities living in institutions were not consulted, despite facing compounded stigma and discrimination. These exclusions reflect broader civil society gaps in addressing intersecting identities and safety concerns for certain groups.

Additionally, the opinions expressed by participants do not necessarily represent the views of all persons with disabilities in Ukraine. While separate validation sessions with ministries and UN focal points supported prioritization, they did not bring all stakeholders together, requiring the authors to reconcile differing perspectives. Legislative changes endorsed or revised after May 2024 were not included in the analysis. Information added after May 2024 is based on government and UN validations as well as the August 2024 UNCRPD Committee conclusions. Although this data highlights trends, which have been incorporated to inform recommendations, they have not been fully triangulated.

Findings

1. Stakeholder Analysis

GOVERNMENT

The Verkhovna Rada of Ukraine oversees legislative initiatives through more than 20 thematic committees, which were updated following the 2019 parliamentary elections. All committees engage in legislation concerning the Convention on the Rights of Persons with Disabilities (CRPD). However, only a few have publicized recent legislative advancements, highlighting a lack of initiative among committees to share information. Notably, any parliament member can propose new legislation to be drafted by these committees.



The **Committee on Social Policy and Protection of Veterans' Rights** focuses on drafting laws to implement rights related to work, rehabilitation, and medical and social expertise around assessing disability^{31,32}. Examples include recent efforts on Law No. 11225 (30 April 2024)³³, which aims to simplify the procedures for determining disability. The committee also holds public hearings on issues such as pensions, social benefits, and employment, often involving a broad range of stakeholders, including OPDs. A recent discussion on the state of prosthetics in Ukraine is an example of such engagement³⁴.

The **Committee on the Health of the Nation, Medical Care, and Health Insurance** develops legislative initiatives focusing on disability assessment and ensuring healthcare rights, including mental health³⁵ (see details [section 5](#)). Similarly, the **Committee on Education, Science, and Innovation** focuses on the right to education for persons with disabilities, emphasizing inclusive education and the deinstitutionalization of education for children with disabilities³⁶.

The **Ukrainian Parliament Commissioner for Human Rights (Ombudsman)** operates as a National Human Rights Institution³⁷, monitoring human rights compliance³⁸. This role includes addressing equality, non-discrimination, and social rights. The ombudsman also functions as the National Preventive Mechanism, overseeing human rights in detention facilities, including psychiatric hospitals and institutions. Since the full-scale invasion, OPDs have reported heightened risks of institutionalization for evacuees, exacerbated by overcrowded facilities, staff displacement, and facility destruction³⁹. The Ombudsman includes these issues in the annual and special report 2023 (details [see section 5](#)).

The **President of Ukraine** appoints three advisors who advocate for disability rights, which play a key role in upholding UNCRPD principles:

1. The Advisor of the President of Ukraine on Barrier-Free Environments⁴⁰,
2. The Advisor on Children's Rights and Rehabilitation⁴¹, and
3. The Advisor on the Rehabilitation of Combatants⁴², a role established in 2016 due to ongoing conflict that began in 2014.

All these roles are formally supporting the implementation of respective strategies and policies and take part in their monitoring.

The Government Commissioner for the Rights of Persons with Disabilities (Government Commissioner), appointed by the Cabinet of Ministers, is a national role designed to formally support disability rights at both national and oblast levels⁴³. The latter is done through oblast representatives, formally established in all 25 oblasts and 2 cities. Unfortunately, the national position is currently vacant. While some oblast representatives, such as Chernivtsi, Vinnytsia, and Zhytomyr, still have representatives, others, including Kyiv and Sumy, lack appointments due to staff shortages, lengthy hiring processes, or untransparent procedures that exclude OPD participation. In 2022, the Commissioner played a pivotal

31. Liudmyla Fursova, FFR (2024): Stakeholder Mapping – Deinstitutionalization in Ukraine.

32. The text of the draft Law. <https://itd.rada.gov.ua/billInfo/Bills/Card/40853>

33. The text of the draft Law.. <https://itd.rada.gov.ua/billInfo/Bills/Card/44131>

34. https://komspip.rada.gov.ua/documents/round_t/76644.html

35. <https://komzdrav.rada.gov.ua/>

36. <https://kno.rada.gov.ua/>

37. according to Paris principles.

38. <https://ombudsman.gov.ua/>

39. The submission available [here](#)

40. T. Lomakina was appointed to this position in accordance with the Decree of the President of Ukraine dated June 15, 2015, No. 248/2021.

41. D. Gerasymchuk was appointed to this position in accordance with the Decree of the President of Ukraine dated June 15, 2015, No. 245/2021.

42. V. Svyrydenko was appointed to this position in accordance with the Decree of the President of Ukraine dated June 15, 2015, No. 246/2021.

43. Regulations on the Government Commissioner for the Rights of Persons with Disabilities and Amendments to the Resolution of the Cabinet of Ministers of Ukraine No. 5 of January 3, 2013, approved by the Cabinet of Ministers of Ukraine No. 125 of February 21, 2017.



role in coordinating the evacuation of persons with disabilities from conflict zones, showcasing the role's potential impact if properly staffed. While these appointments reflect a commitment to disability rights, civil society organizations have criticized the selection processes for lacking transparency and consultancy. The Regulation of Government Commissioner does not explicitly require consultation with OPDs for the appointment of the Government Commissioner or his or her oblast representatives.

Ministries Responsible for Disability Rights

Each ministry is tasked with developing indicators and monitoring systems aligned with the UNCRPD, while formally it is coordinated by the Ministry of Social Policy.

Ministry of Social Policy (MoSP):

The MoSP is the primary body for implementing the UNCRPD⁴⁴, responsible for drafting action plans, coordinating state reports, and managing policies for social protection and vocational rehabilitation for persons with disabilities⁴⁵. The ministry oversees institutions providing social services to vulnerable groups⁴⁶ and is currently leading the development of a deinstitutionalization (DI) strategy till 2034 in collaboration with WHO. Additionally, the MoSP coordinates evacuation efforts for persons with disabilities from institutional care facilities. It also administers IDP allowances (2.000 UAH), with higher amounts allocated to IDPs with disabilities (3.000 UAH based on certification)⁴⁷. Ongoing discussions about the timeframe for these allowances are critical, as their reduction would disproportionately affect vulnerable groups reliant on social protection schemes.

Ministry of Health (MoH):

The MoH governs medical and social examinations to determine disability, a process criticized for adhering to outdated medical models⁴⁸. The system of disability assessment including the individual's ability to work is based on the medical model of disability, perpetuating ableism and undermining the critical focus on activities and participation. The full-scale invasion has exacerbated delays in certification, prompting efforts to simplify procedures for pre-2022 certifications. However, new assessments remain complex due to differentiation between veterans, injured civilians and other people with disabilities (details see [section 5](#)). The MoH is also responsible for psychiatric institution oversight, medical rehabilitation⁴⁹, and ensuring healthcare facilities comply with accessibility standards. Despite its authority, stronger monitoring mechanisms and actionable plans are needed to ensure accessible healthcare for persons with disabilities⁵⁰.

Ministry of Education and Science:

This ministry is responsible for fostering inclusive education at all levels⁵¹. Progress includes legislative reforms, the introduction of assistant teachers, and state subsidies for local governments to enhance

44. Based on the MOSP consultation, November 2024.

45. subparagraph 36 of paragraph 4 of the Regulation on the Ministry of Social Policy of Ukraine. <https://zakon.rada.gov.ua/laws/show/423-2015-%D0%BF#Text> / Cabinet of ministers (2021): law n. 285-p Kyiv <https://zakon.rada.gov.ua/laws/show/285-2021-%D1%80#Text> / https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/SessionDetails1.aspx?SessionID=2691&Lang=en / Para.1 Regulation on Ministry of social Policy. <https://zakon.rada.gov.ua/laws/show/423-2015-%D0%BF#Text>

46. Law of Ukraine "On social services" 2019. Article 11. <https://zakon.rada.gov.ua/laws/show/2671-19#Text>

47. Based on Ukrainian state budget 2024, additionally see here: <https://reliefweb.int/report/ukraine/update-changes-payment-idp-allowance-cmu-resolution-332-enuk>

48. Government portal (2023): MSEC reform. Here: <https://www.kmu.gov.ua/news/moz-tryvaie-robotu-nad-zakonoproektom-z-reformuvannia-msek-v-ukraini>

49. Fursova, L., FFR, 2024: Stakeholder mapping.

50. Accessibility requirements are contained in the conditions for concluding agreements on medical care for the population under the program of medical guarantees, approved by the Resolution of the Cabinet of Ministers of Ukraine dated [April 25, 2018, No. 410](#).

51. The Regulation on the Ministry of Education and Science of Ukraine was approved by the Resolution of the Cabinet of Ministers of Ukraine dated [16.10.2014 No. 630](#).



accessibility⁵² (data related to increased access to education see [section 6](#)). However, challenges persist due to the ongoing conflict. For instance, the lack of accessible shelters in education facilities during air alerts forces many children into homeschooling, increasing burdens on single-headed households. According to humanitarian assessment data (MSNA 2024), disability is one of the primary barriers to accessing education, exacerbated by regional disparities in staff training and infrastructure readiness⁵³ (for further ministry data, see [section 6](#)).

Ministry for Communities, Territories, and Development:

This ministry is tasked with overseeing the development and governance of local communities and territories⁵⁴. Its responsibilities include managing community development, budgeting, and housing policies. A significant aspect of the ministry's work has been its support for decentralization efforts at the Hromada level, granting local governments greater autonomy and resources. The ministry plays a pivotal role in collecting data from various ministries and preparing technical coordination reports for the implementation of the **Barrier-Free Strategy** in Ukraine, which extends until 2030⁵⁵. This strategy includes the reconstruction of destroyed public infrastructure in government-controlled areas, emphasizing accessibility. In addition to its role in infrastructure reconstruction, the ministry is responsible for setting standards in the construction including building codes and transportation sectors, ensuring adherence to barrier-free regulations. It also coordinates and administers compensation programs for properties damaged or destroyed during the conflict, supporting affected communities in their recovery efforts⁵⁶.

Ministry of Justice:

The Ministry of Justice is responsible for technical coordination implementing the National Human Rights Strategy, publishing reports⁵⁷, and coordinating interagency groups to address the monitoring of the Human Rights Strategy⁵⁸. The Ministry of Justice also implemented a policy on Legal aid including directing the Coordination Center for Legal Aid⁵⁹.

Ministry of Veterans Affairs:

This ministry implements policies for the social protection of veterans and their families, focusing on rehabilitation, upskilling, and housing⁶⁰.

Ministry of Reintegration of the Temporarily Occupied Territories (newly Ministry of National Unity of Ukraine⁶¹):

Established in response to the 2014 conflict, this ministry focuses, among other things, on reintegrating displaced residents, including persons with disabilities. It supports IDPs by facilitating resettlement and

52. Confirmed by the ministry consultation on 4.11.2024

53. UN consultation, UNICEF highlighted lack of trained staff around inclusive education.

54. Ministry of restoration (2024): official website. Access here: <https://mtu.gov.ua/en/content/hto-mi-e.html>

55. Text of the Strategy on the official portal of the Verkhovna Rada of Ukraine. // <https://zakon.rada.gov.ua/laws/show/366-2021-%D1%80#Text>

56. The Law of Ukraine 'On Compensation for Damage to and Destruction of Certain Categories of Real 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 Property Damaged and Destroyed as a Result of Hostilities, Terrorist Acts, and Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine'.

57. The National Human Rights Strategy was approved by the Decree of the President of Ukraine of 24 March 2021 No. 119/2021.

58. The Interagency Working Group to Assess the Progress of the National Human Rights Strategy was established in accordance with the Resolution of the Cabinet of Ministers of Ukraine dated May 12, 2021, No. 516. // <https://zakon.rada.gov.ua/laws/show/516-2021-%D0%BF#Text>

59. The Regulation on Coordination Center adopted by CMU on June 6th 2012.

60. The Regulation of Ministry of veteran affairs adopted by Cabinet of Ministers on 27.12.2018 № 1175.

61. <https://zakon.rada.gov.ua/laws/show/1366-2024-%D0%BF#Text>



integration into new communities⁶². However, financial support, such as accommodation allowances, is managed through the MoSP⁶³.

ORGANIZATIONS OF PERSONS WITH DISABILITIES

The public movement for people with disabilities in Ukraine began to take shape in the 1990s and early 2000s. Two foundational organizations, the Ukraine Society of the Deaf⁶⁴ and the Ukraine Society of the Blind⁶⁵, were established by the government during the USSR era (1933). These organizations initially focused on uniting individuals with specific types of disabilities within specific enterprises, for example. These organizations initially focused on uniting individuals with specific types of disabilities within specific enterprises, for example Bila Cerkva from UTOS⁶⁶. Currently, these OPDs are depending on financial support from the government to ensure continuation of these enterprises. While UTOG moved towards a stronger advocacy regarding sign language, UTOS is currently focusing on their specific enterprises rather than advocacy. In the early 1990s, the Union of Organizations of Persons with Disabilities of Ukraine was founded, bringing together people with physical disabilities and further consolidating the movement⁶⁷. By the early 2000s, more specialized groups emerged, such as USER, an association advocating for the human rights of individuals with psychosocial disabilities. USER was particularly active in championing the rights of persons with disabilities in psychiatric and residential institutions. Around the same time, the Coalition for the Protection of the Rights of Persons with Intellectual Disabilities was formed⁶⁸. This umbrella organization united local associations of people with intellectual disabilities and their families. It was the first to advocate nationally for:

- Deinstitutionalization,
- Support systems for individuals with intellectual disabilities,
- Equality in exercising legal capacity, and
- The development of simple language and easy-to-read formats.

Concurrently, organizations of persons with disabilities (OPDs) began to emerge, consolidating advocacy for disability rights at the national level. Among these was the National Assembly of Persons with Disabilities of Ukraine (including Coalition, USER and UTOS), which advocated for accessibility to buildings, transport, and infrastructure as part of Ukraine's accession to the CRPD⁶⁹.

The voice of women with disabilities is becoming stronger through the OPDs they found and lead, such as advocating for rights of women and girls with disabilities having epilepsy⁷⁰, initiatives of local organizations, such as Zhytomyr “Youth, Woman, Family” or Chernivtsi “Leader,” supporting women's access to health services focusing on reproductive rights⁷¹. Finally, initiatives on the human rights of women with disabilities and their participation in society on an equal basis with those without are implemented by Fight For Right⁷².

62. The Regulation on the Ministry of Reintegration of the Temporarily Occupied Territories of Ukraine was approved by the Resolution of the Cabinet of Ministers of Ukraine of 8 June 2016 No. 376 (as amended by the Resolution of the Cabinet of Ministers of Ukraine of 6 May 2020 No. 371).

63. Resolution of the Cabinet of Ministers of Ukraine dated 20.03.2022 No. 332: Issues of payment of accommodation allowance to internally displaced persons.

64. UTOG website: <https://utog.org/pro-utog/>

65. Ukrainian Partnership of the Blind website: <http://cputos.org.ua/pro-utos/istoriya-utos/>

66. <http://cputos.org.ua/uvp-utos/bilotserkivske-uvp-utos/>

67. Website: <https://www.facebook.com/voi.soiu/>

68. Website: https://www.facebook.com/vgocoalition/?locale=ru_ua

69. Website: <https://naiu.org.ua/>

70. <https://hnh.news/2972/niya-nikel-zhinky-rulyat-czym-svitom-i-robyat-jogo-krashhym/>

71. <https://ukraine.unwomen.org/uk/stories/ekspertna-dumka/2023/08/ekspertna-dumka-orhanizatsiyi-shcho-predstavlyayut-zhinok-z-invalidnistyu-v-ukrayini-mayut-naykrashchi-mozhlyvosti-dlya-reahuvannya-na-yikhni-humanitarni-potreby>

72. Finally, numerous initiatives on the human rights of women with disabilities and their participation in society on an equal footing with those without are implemented by FFR



Over time, Ukraine's national human rights movement for people with disabilities evolved to include a diverse array of groups. This included unions of OPDs and NGOs like the League of Strong⁷³, networks uniting activists and people with disabilities such as Fight for Rights⁷⁴, and self-advocacy groups like Inclusive Ukraine. Starting in 2014, organizations of veterans with and without disabilities became integral to the disability rights movement, a trend that grew significantly following the full-scale invasion in 2022⁷⁵. As of 2024, there are over 250 registered OPDs in Ukraine, including more than 20 national impairment-specific and issue-specific OPDs⁷⁶. These organizations actively discuss critical issues such as deinstitutionalization, the implementation of the International Classification of Functioning (ICF), disability assessments, inclusive employment in the open labor market, and government policies supporting OPDs.

The Law defines an OPD by the purpose of its activities⁷⁷, which is not compliant with the UNCRPD⁷⁸. The legislation does not contain any requirements regarding the share of persons with disabilities/families of persons with disabilities in the management of the organization, among the founders of the organization, or membership in the organization. At the same time, in general, Civil Society Organization (CSO) can be with or without membership-base.

The collaborative preparation of this Situation Analysis by the three largest OPDs, alongside their Joint Submission to the UN Committee on the Rights of Persons with Disabilities⁷⁹, demonstrates the sector's ability to unite in defending the human rights of persons with disabilities. This collaborative spirit extends to clusters and the Humanitarian Needs Response Plan (HNRP) civil society consultations led by OCHA. During humanitarian missions near the frontline, the disability-inclusion humanitarian advisor observed that OPDs in some areas had ceased operations, were operating remotely from abroad, or were only partially willing to meet face-to-face due to ongoing hostilities. In addition, due to security issues some OPDs focused their work on oblast city centers with limited or no movement to other areas in the oblast, including rural areas. There are no data available on the effects of this on the situation of persons with disabilities and their rights or members of OPDs that stopped due to the war (more details see [section 8](#)).

Historically, the disability rights movement in Ukraine includes organizations which represent different subgroups in the country and as a result, these organizations can promote somewhat competing priorities and agendas. Despite this, significant progress has been achieved in advancing disability rights by the OPD collective in recent times. For national and international stakeholders, it is crucial to recognize and respect the diversity and power dynamics within the movement. Supporting relevant collaborations and adhering to the UNCRPD principles when working in country, as well as with OPDs⁸⁰ or CSOs is vital to ensuring the protection and promotion of disability rights. The adherence to

73. Website: <https://ls.org.ua/>

74. Website: <https://ffr.org.ua/>

75. Ifes (2023): Needs Assessment for the Implementation of Civic and Political Participation of Veterans with Disabilities Acquired as a Result of War in Ukraine. <https://www.ifesukraine.org/wp-content/uploads/2023/12/ifes-veterans-ukr-web.pdf>

76. IFES Commentary on the Draft Resolution of the Cabinet of Ministers of Ukraine "On the Introduction of Institutional Support for Public Associations of Persons with Disabilities"

77. The Law of Ukraine "On the Fundamentals of Social Protection of Persons with Disabilities" (Article 12) defines that "Organization of persons with disabilities and their unions are established to ensure equal rights and opportunities for persons with disabilities and their social protection, identify and remove obstacles and barriers that impede the rights and needs of such persons, including access to physical environment, transport, information and communication on an equal basis with other citizens, and, taking into account individual capabilities, abilities and interests, to education, labor, culture, physical culture and sports, and the provision of social services, Involvement of persons with disabilities in social activities, exercising public control over the observance of the rights of persons with disabilities, representation of their interests and elimination of any manifestations of discrimination against persons with disabilities and have the right to enjoy benefits and preferences provided for by law. Specifically, with UNCRPD Committee [General comment No.7](#) on Article 4.3 and 33.3 - the participation of persons with disabilities in the implementation and monitoring of the Convention

79. Joint NGO report (2024): "Situation on the Rights of Persons with Disabilities in Ukraine" Access here: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/SessionDetails1.aspx?SessionID=2691&Lang=en

80. See OPD mapping for Ukraine: <https://docs.google.com/spreadsheets/d/1rj6KywNZCq0Jjo7hBbFI8uNICzNM1O37hYejbJyBJU/edit?usp=sharing>



UNCRPD principles strengthens the unification of the movement and ensures inclusive, rights-based progress. Therefore, it's recommended that national and international actors consult with a wide range of stakeholders during the initial assessment phase and ensure that national and sub national OPDs are consulted. Actors can also consult coordinating bodies in Ukraine, such as the Age and Disability Working Group (under the UN Protection Cluster) and the UN Resident Coordinator Office.

CIVIL SOCIETY ORGANIZATIONS (CSOS)

Civil society organizations play a vital role in advancing the human rights of people with disabilities in Ukraine. These organizations collaborate closely with human rights movements to document war crimes and human rights violations, including through participation in initiatives such as the Ukraine 5 AM Coalition⁸¹, which advocates for the protection of disability rights and documenting war crimes. A notable example of such collaboration is the advocacy to reform disability assessment procedures (see [section 5](#)), where the Ukrainian-Helsinki Human Rights Union joined forces with OPDs to drive this effort forward⁸².

Think tanks have also incorporated the rights of persons with disabilities into their agendas, often preparing studies in close cooperation with the disability rights movement⁸³. These studies provide valuable insights and support advocacy for systemic reforms.

CSOs are deeply involved in promoting and implementing deinstitutionalization initiatives. For instance, the organization Social Synergy focuses on developing community-based social services designed to prevent institutionalization⁸⁴. Other Ukrainian human rights organizations have also been active in this area, working to provide alternatives to institutional care and supportive services.

Since the onset of the full-scale invasion, CSOs have been at the forefront of humanitarian efforts for people with disabilities. These include evacuating individuals to safe locations and establishing transit shelters. An example of such work is the organization CXID SOS⁸⁵, which has been instrumental in these efforts. Currently, approximately 60% of all non-governmental organizations providing humanitarian aid are civil society organizations or volunteer groups⁸⁶. This includes significant support for persons with disabilities including collaboration, discussions or meetings with OPDs.

Despite these efforts, challenges remain. Many reports highlight a shortage of accessible vehicles, a lack of proper individual assessments and tailored support, and insufficient awareness and knowledge about the rights of persons with disabilities among service providers. These gaps increase the risk of institutionalization for displaced persons with disabilities and, in some cases, result in premature returns to unsafe areas⁸⁷. Addressing these barriers is critical to ensuring effective and inclusive humanitarian responses.

INTERNATIONAL ORGANIZATIONS

Currently, there are 19 UN resident entities in Ukraine, along with 5 non-resident UN entities. In 2023, UN agencies allocated USD 500.5 million to recovery activities⁸⁸, and as of June 2024, the UN is implementing 205 programmatic interventions as part of its ongoing program cycle⁸⁹.

81. Thus, Fight For Right is a member of the coalition "Ukraine. Five o'clock in the morning,"

82. Ukrainian-Helsinki Human rights forum (2024): MOh and MSEK reform. Access [here](#)

83. Reanimation package for Reform (2023): Vision of Ukraine 2030: social and humanitarian sphere. Access [here](#)

84. Website: <https://socsynergy.org.ua/>

85. Vostok SoS (2024): evacuation of people with disabilities to Germany. Access [here](#). Vostok SoS (2024): transit sites. Access [here](#).

86. N. Noe (2023): Breaking the cycle. Article [here](#)

87. Based on disability advisor (WHO) missions, meetings and conversations in Kharkiv and Dnipro, 2024.

88. United Nations in Ukraine Annual Recovery Results Report 2023

89. Website UN Ukraine: <https://ukraine.un.org/>



Before and after the full-scale invasion, UN agencies implemented a limited number of initiatives to support the rights of persons with disabilities. These efforts have included:

- UNICEF projects on the deinstitutionalization of children with disabilities^{90 91},
- UNDP initiatives in accessibility, universal design, and rehabilitation⁹², and
- UN Women programs on accessibility, decision-making participation, and social services, often in collaboration with organizations like Fight for Rights.

In 2022, disability-specific humanitarian activities were implemented under a PRPD-funded program involving UNICEF, UNDP, UN Women, and UNFPA. However, the inclusion of persons with disabilities in humanitarian action is not consistently mainstreamed across agencies, despite the IASC Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action. Instead, disability-related issues are primarily addressed through the efforts of international organizations with a disability mandate (i.e. Humanity & Inclusion), OPDs, inclusion specialists, and grassroots initiatives. This indicates a lack of coordination and partly a lack of connection among disability expertise. The World Bank contributes to disability-related recovery efforts through the INSPIRE project, which supports social services and benefits. However, OPDs have raised concerns about the Bank's recommendations for recovery investments, which include the reconstruction of institutions, contrary to the principles of deinstitutionalization⁹³.

Ukraine's European Union accession efforts have significantly increased the involvement of the European Commission. In June 2023, the Commission launched a call for proposals under the Fund for Ukraine, allocating €50 billion between 2024 and 2027 to support short-term recovery, reconstruction, and modernization. To access this funding, Ukraine must enforce legislation protecting the rights of persons with disabilities and ensure that restored and newly constructed infrastructure is fully accessible. Additionally, Ukraine is obligated to deinstitutionalize children and adults with disabilities. The European Disability Forum (EDF) emphasizes key requirements that are currently not included under these funding proposals:

- Prohibiting the use of EU funding for building or renovating segregated residential institutions,
- Ensuring accessibility as a core principle with a cross-cutting approach,
- Supporting independent living and transitioning from institutional to community-based living for children, adults, and older persons with disabilities, and
- Collecting timely, disaggregated data on gender, age, and disability⁹⁴.

Since the full-scale invasion, significant gaps in disability data collection and targeting have been evident across sectors and funding mechanisms. For example, ECHO began supporting humanitarian aid programs in Ukraine in 2022, but EDF notes a lack of data on the number of persons with disabilities reached or targeted and insufficient mechanisms for monitoring disability inclusion⁹⁵. The HNRP reporting further reflects inconsistencies, relying on diverse identification methods and WHO prevalence estimates rather than collected data.

The European Disability Forum has actively supported OPDs in Ukraine, providing funding (e.g., from CBM) for humanitarian response projects alongside research and service delivery⁹⁶ and collaborating with international organizations such as WHO and Humanity & Inclusion (HI).

90. UNICEF resources around children with disabilities in Ukraine. Access [here](#)

91. UNICEF (2023): The best interest of the child. <https://www.unicef.org/ukraine/press-releases/the-best-interests-of-the-child>

92. UNDP projects Ukraine: <https://www.undp.org/uk/ukraine/projects/pidtrymka-reabilitatsiyi-osib-z-invalidnistyu-sprychynenoyu-viynoyu>

93. Website: <https://cs.detector.media/community/texts/185411/2023-05-10-gromadska-organizatsiya-fight-for-right-vystupyla-proty-vidbudovy-internativ-dlya-lyudey-z-invalidnistyu/>

94. EDF (2024): [INFORMATION NOTE TO CRPD COMMITTEE EXPERTS](#) Disability priorities at the European level July 2024

95. Ibid.

96. EDF Ukraine website: <https://www.edf-feph.org/ukraine/>



Disability-inclusive programming, both before and after the full-scale invasion, has remained limited to a few UN and international organizations⁹⁷. However, with the support of advisors, cross-cutting working groups, and OPD-led initiatives, several improvements have been observed, such as:

- Enhanced disability-data collection in the Multi-Sectorial Needs Assessment (MSNA),
- A stronger disability lens in strategic documents, including OCHA's Winterization Guidance and HNRP chapters,
- The use of disability as a targeting criterion across sectors, with improved monitoring of people with disabilities reached (though lacking a unified counting methodology) and definition of "Disability" which comply on UNCRPD, and
- Increased participation of OPDs in sectoral interventions⁹⁸.

2. Main Stakeholder Coordination Mechanisms

GOVERNMENTAL COORDINATION

The following outlines the primary government, donor, UN, and CSO coordination mechanisms in Ukraine. Various strategies and action plans related to the implementation of the UNCRPD are coordinated through these mechanisms:

1. National Human-Rights Strategy (including access to justice and non-discrimination related to accessibility), coordinated by Interagency group.
2. The Cabinet of Ministers (CMU) general policies on Disability were coordinated by the Council of Persons with disabilities.
3. National Barrier-Free Strategy, coordinated by the Barrier-Free Council.
4. Action Plan for UNCRPD Implementation, coordinated by the Ministry of Social Policy (MoSP).

In addition, several other coordination mechanisms include CRPD relevant policies or implementation aspects (see [multilateral coordination](#)):

- SDG planning mechanisms
- Humanitarian response mechanisms (Art. 11 UNCRPD mainly)
- EU accession plans and mechanisms
- Strategies developed by various ministries, while coordinated by the barrier-free council
- Strategies and plans at local and regional level, including local barrier-free council.

The following describes the wide coordination mechanisms currently existing in Ukraine, including potential areas of enhancement of coordination (more details in recommendations).

The Council for Persons with Disabilities

The Council for Persons with Disabilities is designated to ensure the rights of persons with disabilities and serves as a disability-specific coordination mechanism at the government level, chaired by the Vice Prime-Minister⁹⁹. Its members include high-ranking officials such as First Deputy or Deputy

97. United Nations in Ukraine Annual Recovery Results Report 2023

98. Experience of disability advisor (WHO) 2024.

99. The Council for Persons with Disabilities established in accordance with the Resolution of the Cabinet of Ministers of Ukraine September 14, 2016, No. 628



Ministers, representatives from the Verkhovna Rada's Committee on Social Policy and Protection of Veterans' Rights, the President's Advisors-Commissioners, and the Government Commissioner for the Rights of Persons with Disabilities. The Council also includes representatives of OPDs, provided they are registered in more than 15 oblasts and focus on the social protection of persons with disabilities. This council can be identified as advisory body to the Cabinet of ministers. However, organizations emphasizing the human rights of persons with disabilities are excluded from this definition and cannot participate in the Council¹⁰⁰. It is noteworthy that the Council has not convened since 2021, rendering it currently inactive.

The Barrier-Free Council

The Barrier-Free Council, a temporary consultative-advisory body under the Cabinet of Ministers of Ukraine (CMU), was established to promote the creation of a barrier-free environment^{101 102}. Unlike the Council for Persons with Disabilities, it includes a more diverse range of stakeholders, including 16 ministries, 24 regional governmental bodies¹⁰³, members of Parliament, UNDP, UNICEF, WHO, international donor organizations (e.g., USAID, the European Union, the Embassy of Switzerland, and GIZ), and OPD representatives¹⁰⁴.

The Barrier-Free Council, chaired by the Prime Minister and co-chaired by two Vice-Prime Ministers, was initiated by the First Lady of Ukraine. This council has effectively served as an advocacy body for disability rights in the absence of the active Council for Persons with Disabilities. The Barrier-Free Council meets biannually, holds quarterly meetings with civil society organizations (including OPDs), and oversees the implementation of the National Strategy for Creating a Barrier-Free Space until 2030. The monitoring of the strategy's updated Action Plan for 2025-2026 is coordinated by the Barrier-Free Council and led by various ministries, such as the Ministry of Territorial and Community Development, which technically monitors the Action Plan, Ministry of Health (MoH), which oversees the accessibility of healthcare facilities. The coordination among this wide range of stakeholders is functioning effectively, with several initiatives currently in progress¹⁰⁵. The Barrier-Free Council is also responsible for coordinating the development of the updated Action Plan, which is based on the Barrier-Free Strategy formulated in 2021. This strategy focuses on key areas aimed at creating an inclusive, barrier-free environment. (Refer to Figure 1 for details on the strategy's key areas.)



Participation is enshrined within the barrier free council, encouraging ministries to ensure implementation and adherence of accessibility requirements. However, OPDs are not involved in monitoring the implementation of the Barrier Free Strategy and the associated action plan. Decision making processes and policy development related to disability inclusion and other mainstream policy areas, exclude the voices of the OPD community¹⁰⁶

100. Ibid. "Representatives of all-Ukrainian public associations whose activities are aimed at social protection of persons with disabilities (with consent)".
 101. The Barrier-Free Council was established by the Resolution of the Cabinet of Ministers of Ukraine dated April 14, 2021, No. 443.
 102. Regulation of the Barrier free council, Resoluted by Kabinet of Ministers 14.04.2021 #443. Para. 1.
 103. Barrier-Free council Composition <https://zakon.rada.gov.ua/laws/show/443-2021-%D0%BF#n9>
 104. Ibid. The Council officially includes representatives of organizations of persons with disabilities: NGO "Chernivtsi Association "Zakhyst", All-Ukrainian Association of Persons with Disabilities "Group of Active Rehabilitation", NGO "Fight for Rights", NGO "League of the Strong".
 105. As introduced by T. Lomakina on 31. October 2024 in the meeting Topic: Presentation of the Action plan for 2025-2026 to implement the national strategy for creating a barrier free environment in Ukraine until 2030'
 106. See UNCRPD committee concluding observations 2024, p.2, p.20-21 // https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/SessionDetails1.aspx?SessionID=2691&Lang=en



Coordination by the Ministry of Social Policy

The MoSP is tasked with coordinating the implementation of the UNCRPD¹⁰⁷. However, its effectiveness remains difficult to assess. Reports on the state's implementation plans, as well as the second and third periodic reports of state parties, are largely descriptive, offering little insight into why certain measures or UN Committee recommendations have not been implemented or are only partially fulfilled¹⁰⁸.

While these coordination mechanisms have largely remained unchanged since the conflicts of 2014/2022, discussions around EU accession have revitalized interest in these processes. Government consultations have indicated that significant reforms are underway, requiring clear communication during this transitional period and strong support from UN agencies to align with a rights-based approach.

Coordination Mechanisms for Children's Deinstitutionalization (DI)

Under the MoSP's leadership, with support from the EU and UNICEF, the Coordination Center for the Development of Family Education and Care was established 2023. One of its key tasks is to "provide for the development and implementation of the National Plan for Family Education and Care of Children in Ukraine to be developed by the team of the Coordination Center together with all authorities, NGOs, international partners, and experts."¹⁰⁹ Within the process of the SitAn this coordination mechanisms has focused on the development of the DI strategy for children. Currently not guiding further programming in DI. The government is going to establish a coordinating body for the implementation of the DI strategy for adults with disabilities¹¹⁰.

MULTILATERAL COORDINATION MECHANISMS

Multilateral Donor Coordination Platform for Ukraine:

Established by G7 leaders¹¹¹, this platform focuses on recovery efforts and includes officials from Ukraine, the EU, G7 countries, and international financial organizations. High-level recovery conferences (e.g., Lugano, London, Berlin) provide opportunities for civil society, including OPDs, to participate.

Social Recovery and Inclusion Partnership for Ukraine:

This partnership, formed through a joint declaration between the MoSP, the UK Foreign, Commonwealth & Development Office, the EU, UNICEF, the World Bank, and other development partners, aims to create a foundation for good faith cooperation in the field of social recovery and inclusion. The partnership will enhance coordination, communication, and advocacy for social recovery and inclusion across policies and programs in Ukraine¹¹².

Inter-Agency Standing Committee (IASC) Humanitarian Cluster Coordination System:

Activated in December 2014 during the Donetsk and Luhansk conflicts, the Cluster Coordination System expanded following the 2022 invasion to cover the entire country. Currently, there are nine clusters, three areas of responsibility (GBV, Mine Action, Child Protection), and 11 working groups,

107. "coordinates the work of central and local executive authorities, local self-government bodies, enterprises, institutions and organizations on the implementation and implementation of the UN Convention on the Rights of Persons with Disabilities" Sub-clause 36 of clause 4 of the Regulation on the Ministry of Social Policy of Ukraine, approved by the Resolution of the Cabinet of Ministers of Ukraine dated June 17, 2015, No. 423, as amended.

108. The final report on the implementation of the Program and information for previous years are posted on the website of the Ministry of Social Policy. // <https://www.msp.gov.ua/timeline/Realizaciya-norm-Konvencii-pro-prava-osib-z-invalidnistyu.html> as well as <https://www.msp.gov.ua/news/23709.html>

109. UNICEF (2023): the best interest of the child.

110. The task 2.1 Operational Plan on 2025-2027.

111. Website Coordination platform: <https://coordinationplatformukraine.com/uk/main/>

112. UK Government recovery and inclusion: <https://www.gov.uk/government/news/joint-declaration-of-intent-on-support-for-social-recovery-and-inclusion-in-ukraine>



including those focused on inclusion, such as (See [Annex 3](#) for a list of clusters, sub-clusters, and their lead agencies¹¹³):

- The Age and Disability Technical Working Group (ADTWG) under the Protection Cluster,
- The Gender and Inclusion Working Group under the WASH Cluster, and
- The Gender, Inclusion, and Accountability to Affected Population Working Group under the Cash Working Group.

The monitoring of cluster indicators includes disability-disaggregated data¹¹⁴, ensuring a focus on inclusivity in humanitarian responses. In 2024, a WHO Inclusive Humanitarian Action Advisor provided support to the Inter-Cluster Coordination Group (ICCG) and Inter-Cluster Working Group (ICWG). This support aimed to foster disability mainstreaming across sectors and to strengthen the integration of disability inclusion within the Humanitarian Needs Response Plan (HNRP) 2025. Despite progress, gaps remain. OPDs report insufficient participation opportunities in government-led mechanisms, and humanitarian strategies often lack effective inclusion measures for persons with disabilities. Strengthening these mechanisms and increasing participation opportunities for OPDs is critical to ensuring disability rights are upheld in both humanitarian and recovery efforts¹¹⁵.

POTENTIAL STAKEHOLDER AND COORDINATION GAPS

Ukraine benefits from a wide range of international and regional organizations, governments, and donor groups that support recovery and humanitarian assistance, including efforts targeting people with disabilities. The gradual mainstreaming of disability inclusion in programs and humanitarian response initiatives is also a significant strength. National and international organizations and UN agencies have increasingly shown responsiveness to inclusion recommendations from OPDs during planning and implementation phases. Capacity development efforts by OPDs, specialized organizations (e.g., Humanity & Inclusion, HelpAge), the Age and Disability Technical Working Group (ADTWG), and disability-inclusion specialists have further strengthened these efforts. However, a stakeholder mapping related to UNCRPD implementation highlights several key gaps:

1. Lack of Unified Coordination Mechanism:

While the Government of Ukraine (GoU) has several coordination mechanisms for specific topics, there is no single forum to align efforts across humanitarian, nexus, and development phases. This absence of central coordination impacts cross-sectoral support at community, self-government, and local government levels¹¹⁶.

2. Limited accessible Information and Barriers to Participation:

OPDs and persons with disabilities face significant challenges in accessing information about UN and international programming across humanitarian, nexus, and development phases. This is compounded by inaccessible environments and participation mechanisms, particularly at the sub-national level. As a result, OPDs' involvement in various coordination mechanisms remains inconsistent, further hindering their ability to effectively participate in planning and decision-making processes.

113. OCHA Inter-cluster system Ukraine: <https://response.reliefweb.int/ukraine/inter-cluster-coordination>

114. Ukrainian humanitarian response plan (2023). Access here: <https://reliefweb.int/report/ukraine/ukraine-humanitarian-response-plan-february-2023-enuk>

115. With the advisory support a more unified data collection, participation of OPDs and guidance materials fostering a rights-based approach and language have been fostered.

116. Reflected in the Barrier free meeting on 30.10.2024



3. Fragmented Approaches:

There are differing interpretations of a rights-based approach at the national, regional, and community levels¹¹⁷. Current practices often blend medical, benefits-oriented, and human-rights approaches, creating inconsistencies in UNCRPD implementation. Additionally, in times of war, the need for enhanced coordination and international stakeholder support becomes even more critical.

4. Interrupted Access to Life-Saving Services:

Interruptions in life-saving medication and support services have disproportionately affected individuals with disabilities, including those in institutional care or living with HIV. Ensuring uninterrupted medication access (e.g., antiretroviral treatment) during evacuations and in shelters is critical to prevent severe health consequences.

A significant gap is the lack of coordination among stakeholders, policies and across various fora, which has increased since 2014 and more recently since 2022. For example, while some processes adhere to barrier-free standards in line with the UNCRPD, others rely on outdated medical models, such as the MoH disability certification process. Stronger coordination, particularly by the MoSP, could facilitate the transition toward a human-rights-based approach, aligning humanitarian responses with the UNCRPD to foster inclusive recovery and build-back-better strategies. Moreover, despite the increase in humanitarian actors, adherence to UNCRPD obligations in humanitarian responses remains weak. This includes insufficient guidance for implementing disability-inclusive strategies, a lack of trained staff, and inadequate funding for cross-cutting advisory efforts. Coordination between government institutions, international organizations, donors, and other partners remains fragmented, which hinders the development of a rights-based humanitarian and recovery policy.

Underrepresented Groups and Rural Challenges

OPDs and validation session participants noted limited knowledge of UN and international organization programs in Ukraine. Concerns were raised about international project resources not being used to strengthen social service capacities in small community-based organizations (CBOs) in rural areas. These areas often house persons with disabilities requiring significant external assistance and are at a high risk of institutionalization—an issue exacerbated under martial law. Local OPDs, which had previously filled gaps in social protection, have seen their capacities decline due to financial and human resource constraints, as well as de-prioritization during the war. Additionally, a lack of knowledge among actors about Ukrainian disability rights and legislation has led to practices that contradict UNCRPD obligations, such as investing in institutional care facilities. While the Humanitarian Country Team (HCT) provides guidance for temporary support to such facilities, systemic communication between coordination mechanisms on recovery approaches rooted in human rights, inclusion, and equity remains insufficient. Additionally, the involvement of OPDs in the development of recovery plans supported by donors and international and regional organizations is lacking¹¹⁸. The mechanisms and scope of resource mobilization by international institutions and initiatives to support the deinstitutionalization of adults with disabilities, as declared at the highest levels during Ukraine's reconstruction efforts, require further clarification.

Challenges in Supporting and Engaging OPDs in Decision-Making

OPDs and participants in validation sessions highlighted the absence of a coherent state policy to support them. While the government plans to align the legal definition of organizations of persons

117. Confirmed by Barrier Free consultation on 30.10.2024

118. FFR (2023): rebuilding Ukraine. Access [here](#)



with disabilities with the standards of the UNCRPD¹¹⁹, it has yet to approve conditions for providing organizational support to OPDs to ensure their participation in the implementation and monitoring of the Convention. Since 2022, funding from the Ministry of Social Policy (MoSP) has been directed toward service provision only, which is not fully aligned with the UNCRPD. Government efforts to involve OPDs in decision-making remain inconsistent. Formal consultation mechanisms are used less frequently by OPDs, which instead prefer direct cooperation with Parliament or in-person engagements with ministries and agencies developing relevant decisions. The ineffectiveness of formal mechanisms is likely to contribute to this trend. A major gap lies in the lack of conditions enabling the meaningful participation of persons with disabilities and OPDs in decision-making processes. This challenge extends to relationships between OPDs and the government, as well as with international and regional stakeholders, including humanitarian mechanisms such as general coordination meetings at the oblast level (led by OCHA). Inaccessibility of both the physical and informational environment significantly impedes the ability of persons with disabilities and OPDs to participate in policy planning, monitoring, and humanitarian strategy development. The Multisectoral Needs assessment (MSNA) 2024 further highlights the lack of accessible information, which prevents persons with disabilities from meaningfully accessing essential humanitarian services. Specific barriers raised during validation sessions included:

- The fragmented or absent use of sign language and accessible formats,
- A lack of procedures for counseling individuals with intellectual disabilities using simple language or specially trained personal assistants, and
- The absence of standardized requirements for resource support, which excludes people with intellectual disabilities from counseling processes altogether.

These issues are particularly evident within the cluster system, where OPDs face challenges in actively participating in humanitarian decision-making. However, improvements have been observed at the national level among umbrella OPDs in 2024.

Recommendations

- **Enhanced Coordination:**

The government should establish a dedicated coordination mechanism or improve existing ones (e.g. General Coordination meetings) to ensure the rights of persons with disabilities are upheld across sectors and stakeholders.

- **Independent Monitoring:**

A mechanism for independent monitoring of the UNCRPD should be introduced, by empowering the Ombudsman rather than creating an additional mechanism. To ensure proper monitoring, data collection and analysis as an underlying issue needs to be addressed throughout.

- **Strengthened Humanitarian Responses:**

UNCRPD adherence in humanitarian responses must be strengthened through a multi-sectoral lens, focusing on marginalized groups within the disability community.

119. The National Action Plan for the Implementation of the CRPD for the period up to 2025 was approved by the Cabinet of Ministers of Ukraine on 28 December 2016 p. № 1073-p. // <https://zakon.rada.gov.ua/laws/show/285-2021-%D1%80#n22>



- Inclusive Recovery Efforts:

Recovery strategies should ensure humanitarian efforts are linked to sustainable approaches, preventing fragmentation and leaving no oblast behind in disability inclusion.

- Focus on Rural and Marginalized Communities:

Resources must be directed to strengthen CBOs and support persons with disabilities in rural areas to prevent institutionalization and promote community based inclusive social services.

- Capacity Building and Awareness:

Stakeholders must be trained on Ukrainian legislation and rights-based approaches to ensure adherence to UNCRPD obligations and promote equity in recovery efforts.

By addressing these gaps and implementing these recommendations, Ukraine can build a coordinated, rights-based, and inclusive approach to disability inclusion in recovery and humanitarian responses.

3. Equality and Non-Discrimination

Over the past 15 years¹²⁰, efforts have been made to prevent and combat discrimination based on disability in Ukraine. However, current legislation remains fragmented and inconsistent, lacking coherent mechanisms to ensure justice for violations of the right to equality and protection from discrimination. Stereotypes and prejudices against persons with disabilities persist, and progress toward a rights-based understanding has been slow. People with disabilities, particularly those with intellectual and psychosocial disabilities, continue to be among the most stigmatized groups in Ukraine. The legacy of the Soviet-era system of institutionalized care further entrenches this marginalization. This systemic issue is also reflected within the humanitarian response, where barriers limit access to essential services for persons with disabilities. Additionally, limited income opportunities exacerbate their vulnerability and hinder their capacity to cope with ongoing challenges. Veterans with disabilities face most of these challenges, as described in more detail in the subsection Veterans with disabilities.

EQUALITY AND NON-DISCRIMINATION IN NATIONAL LEGISLATION

The system for preventing and combating discrimination in Ukraine is grounded in several key legal instruments, including:

- The Constitution of Ukraine adopted by the Verkhovna Rada of Ukraine on the 28th of June 1996 with amendments¹²¹,
- The Law of Ukraine "On the Principles of Preventing and Combating Discrimination in Ukraine" (the Anti-Discrimination Law) adopted by the Verkhovna Rada of Ukraine on the 06th of September 2012 with amendments¹²²,
- The Law of Ukraine "On the Fundamentals of Social Protection of Persons with Disabilities" adopted by the Verkhovna Rada of Ukraine on the 21st of March 1991 with amendments, and
- Various other laws and regulations.

120. The time since Ukraine's accession to the UN Convention on the Rights of Persons with Disabilities has been taken as a countdown. The Convention was ratified on 16.12.2009. The Convention for Ukraine entered into force on 16.03.2010 // Law of Ukraine "On Ratification of the Convention on the Rights of Persons with Disabilities and the Optional Protocol thereto" // <https://zakon.rada.gov.ua/laws/show/1767-17#Text>

121. Ukrainian constitution // <https://zakon.rada.gov.ua/laws/show/254%D0%BA/96-%D0%B2%D1%80#Text>

122. Law of Ukraine "On the Principles of Preventing and Combating Discrimination in Ukraine" // <https://zakon.rada.gov.ua/laws/show/5207-17#Text>



The Constitution of Ukraine does not explicitly list disability as grounds for prohibiting restrictions or privileges, though the grounds are considered open-ended¹²³. However, discriminatory practices persist, such as the deprivation of voting rights for individuals deemed legally incapacitated¹²⁴.

The Anti-Discrimination Law, adopted in 2012 and amended in 2014¹²⁵, lacks robust enforcement mechanisms and clear definitions of different types of discrimination. For example, refusing reasonable accommodation is not included under this law (see details section reasonable accommodation). Proposed enhancements, such as administrative penalties for discrimination and the expansion of protected grounds, remain in draft form¹²⁶. The ongoing conflict and socio-political upheaval have exacerbated the urgency for effective legal protections. Advocacy groups have emphasized the critical need for reforms to strengthen the law, establish accountability mechanisms, and protect vulnerable communities amid the humanitarian crisis.

Social Protection of Persons with Disabilities

The Law on the Fundamentals of Social Protection of Persons with Disabilities¹²⁷, adopted in 1991, is based on a medical model of disability and fails to address the complexities of disability rights. Although the law aims to provide for key areas such as employment, education, and accessibility, implementation is hindered by limited state resources and a lack of coherence with other legislative acts¹²⁸. Reforms aligned with a rights-based model of disability are urgently needed, especially in the context of the ongoing conflict, to ensure comprehensive support and inclusion for persons with disabilities across all aspects of public life¹²⁹. Advocacy efforts are essential to push for these changes and enhance the alignment of domestic legislation with the UNCRPD.

Education Legislation

The Law of Ukraine "On Education" distorts the definition of "reasonable accommodation" by omitting the concept of "excessive burden,"¹³⁰ leading to misunderstandings about the responsibilities of educational institutions in supporting access to education. Furthermore, "refusal of reasonable accommodation" is not explicitly defined as a form of discrimination based on disability. A relevant draft law aimed at addressing these gaps has remained pending since 2015¹³¹. This legislative shortfall significantly limits access to education for children with disabilities. Disability is identified as the greatest barrier to education¹³², making urgent adaptations to the law necessary. Additionally, the lack of mechanisms to assess individual educational needs further exacerbates these challenges.

Employment Legislation

Ukraine's labor and anti-discrimination laws support equality for persons with disabilities but fall short of the standards set by the UNCRPD¹³³. Employers are required to "create and allocate jobs" for persons with disabilities; however, courts often find these provisions ineffective. Employers frequently avoid

123. Article 24 of the Constitution of Ukraine.

124. Article 70 on the right to vote in referendums and elections: "Citizens who have been declared legally incapable by a court shall not have the right to vote."

125. The Anti-Discrimination Law defines discrimination, prohibits it on the basis of an open list of grounds, including disability, defines five forms of discrimination, and defines the powers of authorities and local self-government bodies in the field of preventing and combating discrimination.

126. Draft Law of 20.11.2015 No. 3501 "On Amendments to Certain Legislative Acts of Ukraine (on Harmonization of Legislation in the Field of Preventing and Combating Discrimination with the Law of the European Union)" // https://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=57162

127. Law of Ukraine "On the Fundamentals of Social Protection of Persons with Disabilities in Ukraine" // <https://zakon.rada.gov.ua/laws/show/875-12#Text>

128. FFR (2022): Alternative Report on Ukraine's Implementation of the CRPD <https://ffr.org.ua/wp-content/uploads/2022/10/CRPDAlternativeReport.pdf>

129. Article 2 of the Law of Ukraine "On the Fundamentals of Social Protection of Persons with Disabilities in Ukraine"

130. Paragraph 24 of Part 1 of Article 1 of the Law of Ukraine "On Education" // <https://zakon.rada.gov.ua/laws/show/2145-19#Text>

131. Draft Law of 20.11.2015 No. 3501 "On Amendments to Certain Legislative Acts of Ukraine (on Harmonization of Legislation in the Field of Preventing and Combating Discrimination with the Law of the European Union)" // https://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=57162

132. Education cluster presentation based on MSNA 2024 data.

133. FFR (2022): Alternative report: The principle declared in Article 27 of the Convention to be able to freely choose or agree to work in conditions where the labor market and the working environment are open, inclusive and accessible.



penalties for failing to meet the 4% employment quota by citing a lack of applicants with disabilities in job competitions¹³⁴. Humanitarian agencies, including the United Nations and implementing partners, are not actively applying the state's employment quotas. Since 2022, the number of people acquiring disabilities due to injuries and trauma has risen significantly. This highlights the critical need for inclusive livelihood opportunities, including upskilling and career change initiatives, to ensure economic resilience and active labor market participation for persons with disabilities, as confirmed by the ministries meeting ([Annex 10](#)). Accessible higher education and vocational training options remain limited.

PROTECTION AGAINST DISCRIMINATION

The Ombudsman is responsible for monitoring compliance with non-discrimination principles¹³⁵ and annually publishes statistics on discrimination complaints. In 2022, 361 complaints concerning discrimination were received, of which only 4.3% related to discrimination based on disability¹³⁶. This represents a decline in overall complaints compared to 21, when 463 discrimination complaints were recorded¹³⁷. However, the low percentage of disability-related complaints likely does not reflect the true extent of discrimination faced by persons with disabilities in Ukraine. The lack of detailed public information on how complaints are processed—such as the number upheld, rejected, or dismissed due to insufficient evidence—hinders transparency. Additionally, procedural barriers, including a lack of information or inaccessible mechanisms, likely contribute to the low number of complaints.

Court-Based Protection

It is difficult to determine how many people with disabilities seek protection from discrimination through the courts, as no state body collects statistics disaggregated by protected characteristics or tracks the outcomes of such cases. An analysis of court practices reveals that before the full-scale invasion, 18% of discrimination claims (out of 238 cases) in recent years involved disability-related issues¹³⁸. Examples of lawsuits include:

- The inability to purchase discounted tickets on the Ukrzaliznytsia website due to its inaccessibility for people with visual impairments,
- Inaccessible pharmacies,
- Denial of travel insurance for persons with disabilities,
- Inaccessible nightclubs, and
- Denial of loans to persons with disabilities¹³⁹.

Publicly known cases from 2020 highlighted the importance of reasonable accommodation in ensuring the participation of persons with disabilities. In two cases (see [Annex 4](#)), courts emphasized that providing reasonable accommodations is essential for upholding the UNCRPD^{140 141}. They held the responsible entities accountable for ensuring necessary adaptations.

Barriers in Legal Capacity and Decision-Making

A significant issue affecting persons with disabilities in Ukraine is the outdated and in violation of the UNCRPD guardianship system, which does not require consideration of the individual's preferences.

134. Ibid., Judgment in case No. K/9901/13878/18 of 22 August 2018, accessed <https://reyestr.court.gov.ua/Review/7600866>

135. Article 10 of the Law of Ukraine "On the Principles of Preventing and Combating Discrimination in Ukraine"

136. Key figures // Annual report on the state of observance and protection of human and civil rights and freedoms in Ukraine in 2022 // <https://ombudsman.gov.ua/report-2022/osnovni-tsyfry>

137. <https://www.ombudsman.gov.ua/storage/app/media/uploaded-files/schoricha-dopovid-2021.pdf>

138. https://ffr.org.ua/wp-content/uploads/2024/09/INT_CRPD_CSS_UKR_58975_E.pdf?form=MG0AV3

139. Review of Strategic Court Cases Against Discrimination on the Basis of Disability // <https://www.hsa.org.ua/blog/oglyad-strategichnyh-sudovyh-sprav-proty-dyskryminatsiyi-za-oznakoyu-invalidnosti>

140. Decision of the Ternopil District Court dated 13.10.2020 in case No. 500/1717/20 // <https://reyestr.court.gov.ua/Review/92159442>

141. Paragraph 70. Decision of the Supreme Court of Ukraine. <https://reyestr.court.gov.ua/Review/120609505>



Approximately 35,000 Ukrainians, including women¹⁴², are deprived of legal capacity, preventing them from exercising their economic, social, political, cultural, and other rights^{143 144}. Every two years this decision about limited or deprived legal capacity must be reconsidered by psychiatric expertise consisting of a group of psychiatrists or one psychiatrist, which depending on person of Judge decision. The court takes the final decision about the potential extension, formally based also on the individual being present¹⁴⁵ and the conclusion of the expert group represented by one doctor in court. However, this is not always the case. As included in the UN Monitoring Mission report 2022, for example stating violations of the right to be present during court hearings as well as the heavy reliance of court decisions on the results of psychiatric examinations¹⁴⁶.

State interventions in these cases rarely focus on introducing supported decision-making mechanisms or reforming the guardianship system. Notably, alternative mechanisms for supported decision-making were introduced in 2023. While individuals deprived of legal capacity gained the right to petition courts directly for restoration of capacity in 2017¹⁴⁷, it was not until 2023 that they could apply for free legal aid independently. However, the aid is limited to court-determined issues¹⁴⁸. Despite a 2018 Constitutional Court ruling declaring laws preventing incapacitated persons from appealing to state and local authorities unconstitutional¹⁴⁹, no legislative changes have been enacted to address this issue. The lack of reforms continues to create significant barriers, restricting the full and active participation of persons with disabilities in society^{150 151 152}. Over half of surveyed individuals with disabilities reported restrictions on legal capacity, including:

- Denials of credit and insurance services,
- Refusals of banking services, and
- Requirements to have accompanying persons present in various institutions.

These restrictions are caused by a combination of physical barriers in institutions, institutional and procedural communication barriers (especially for individuals with visual or hearing impairments), and attitudinal biases¹⁵³.

4. Accessibility

The Resolution of the Cabinet of Ministers of Ukraine of 29 July 2009, titled “Barrier-Free Ukraine,”¹⁵⁴ can be considered one of the first long-term action plans for accessibility in the country. In 2020, prior to adopting the National Strategy for the Creation of a Barrier-Free Space for the Period up to 2030,

142. The number of persons declared legally incapable by a court varies. According to the Ombudsman:

- according to the CEC as of 24.02.2022 – 35372 persons;

- according to the Ministry of Social Policy as of 01.01.2023 – 36880 people;

- according to the National Social Service as of 01.07.2023 – 31075 people;

[Special Report of the Ukrainian Parliament Commissioner for Human Rights](#) on the State of Observance of Social and Economic Rights of Adults in Need of Care and Guardianship in the Conditions of the Legal Regime of Martial Law

143. The Civil Code of Ukraine stipulates: “An incapacitated individual has no right to make any transaction.” Part two of Article 41 of the Civil Code of Ukraine

144. Part three of Article 41 of the Civil Code of Ukraine // <https://zakon.rada.gov.ua/laws/show/435-15#Text>

145. Article 299 of the Civil Procedure Code of Ukraine.

146. [Briefing Note](#) the Human Rights Situation of Persons with intellectual and psychosocial disabilities in Ukraine. 1 February 2022. – P. 7.

147. https://lb.ua/blog/oleksandr_vodennikov/369631_pro_reformu_protseusualnih_kodeksiv.html

148. The changes concerned Articles 10 and 18 of the Law of Ukraine “On Free Legal Aid”. <https://zakon.rada.gov.ua/laws/show/3460-17#Text> In 2023, further clarifications to the Civil Procedure Code of <https://zakon.rada.gov.ua/laws/show/3001-IX#Text> were proposed.

149. Decision of the Constitutional Court of Ukraine as of October 11, 2018 No. 8-r/2018 “in the case on the constitutional petition of the Commissioner for Human Rights of the Verkhovna Rada of Ukraine on the compliance with the Constitution of Ukraine (constitutionality) of certain provisions of part two of Article 8, the second sentence of part four of Article 16 of the Law of Ukraine “On Citizens’ Appeals” (case on the appeal of persons recognized by the court as incapable)” // <https://zakon.rada.gov.ua/laws/show/v008p710-18#n73>

150. Marriage of people with disability, after first rejection: <https://suspiitne.media/kropyvnytskiy/577695-u-kropivnickomu-nareceni-aki-maut-porusenna-zoru-odruzilisa-z-drugoi-sprobi-comu-im-persogo-razu-vidmovili/>

151. FFR (03.07.2024) preparatory report for the report to the UN committee on the rights of persons with disabilities.

152. Ibid.: Lack of elevator and 2nd floor location of the office leading to not submitting documents to a sole proprietorship in person

153. FFR (2024): survey. A total of 45 people took part in the survey - 39 people with disabilities, 7 mothers of children with disabilities.

154. <https://zakon.rada.gov.ua/laws/show/784-2009-%D0%BF#Text>



a nationwide survey, “Opinions and Views of Ukrainians on Barrier-Free Society,” was conducted at the initiative of the First Lady. The survey revealed that 56% of respondents rated the level of barrier-free accessibility in the country as low or very low¹⁵⁵. With the establishment of the Barrier-Free Council in 2020, accessibility became a cross-cutting priority, integrating efforts across 14 ministries under the “National Strategy for the Creation of a Barrier-Free Space for the Period up to 2030”¹⁵⁶. The current Action Plan (2023-2024) is being implemented, and updates for the 2025-2026 Action Plan are under review at the time of writing¹⁵⁷. Despite these initiatives, persons with disabilities continue to report significant physical and communication barriers, reflecting the limited implementation of accessibility policies. For instance, the Multi-Sectoral Needs Assessment (MSNA 2024) highlights that inaccessible information remains a critical barrier, preventing persons with disabilities from fully accessing humanitarian services.

PHYSICAL ENVIRONMENT

Ukrainian law mandates that construction projects comply with state construction standards¹⁵⁸, with oversight provided by state architectural and construction control bodies, such as the State Architectural and Construction Inspectorate of Ukraine¹⁵⁹. Local governments and non-governmental organizations (NGOs) can monitor the accessibility of buildings, but their authority is limited. NGOs lack the ability to impose sanctions or issue binding orders, and local representatives can only act within their jurisdiction. Even when violations occur, only formal complaints can trigger corrective actions. The effectiveness of the monitoring system is questionable. For instance, in the first half of 2023, the State Inspectorate of Architecture and Urban Planning of Ukraine issued over 91,000 construction permits but conducted only 112 inspections. This indicates significant gaps in enforcement, likely exacerbated by the ongoing war, which has disrupted inspection activities¹⁶⁰.

Accessibility Data and Strategic Planning

The Barrier-Free Strategy has highlighted the government’s lack of comprehensive data on accessibility¹⁶¹, including information on the number of inaccessible buildings, those newly built or reconstructed, and accessible transport and infrastructure. This data gap makes it difficult to evaluate progress toward accessibility targets. For example, the National Action Plan for the Implementation of the CRPD (2025)¹⁶² includes a target to make 70% of public and civilian facilities accessible to persons with disabilities. However, no baseline data was established to measure the number of accessible or inaccessible facilities. Many strategic documents¹⁶³ use vague, non-measurable indicators such as “increase in accessibility,” further hindering accountability. Nonetheless, progress has been made in developing unified criteria for determining barrier-free environments, conducting surveys and publishing relevant information, and creating a database of object surveys¹⁶⁴. By October 2021, surveys of 33,000 facilities had been conducted in collaboration with CSOs¹⁶⁵, revealing that only 10% of the facilities were fully

155. State survey: <https://bbu.org.ua/dumki-ta-poglyadi-ukrainciv-shhodo-bezbar-iernosti-v-suspilstvi/>

156. The Strategy was approved by the Order of the Cabinet of Ministers of Ukraine dated April 14, 2021, No. 366-p.

157. Informed by T. Lomakina in the information session on 31.10.2024

158. Para 1 Article 11 Law of Ukraine “On building codes”. <https://zakon.rada.gov.ua/laws/show/1704-17#Text>

159. Law of Ukraine “On Regulation of Urban Development” dated 17.02.2011 No. 3038-VI

160. Information during the barrier-free meeting, Annex 4.

161. Order of the Cabinet of Ministers of Ukraine dated 14.04.2021 No. 366-r “On Approval of the National Strategy for Creating a Barrier-Free Space in Ukraine for the Period up to 2030” // <https://zakon.rada.gov.ua/laws/show/366-2021-%D1%80#Text>

162. Order of the Cabinet of Ministers of Ukraine dated 07.04.2021 No. 285-r “On Approval of the National Action Plan for the Implementation of the Convention on the Rights of Persons with Disabilities for the Period up to 2025” // <https://zakon.rada.gov.ua/laws/show/285-2021-%D1%80#Text>

163. Order of the Cabinet of Ministers of Ukraine dated 14.04.2021 No. 366-r “On Approval of the National Strategy for Creating a Barrier-Free Space in Ukraine for the Period up to 2030” // <https://zakon.rada.gov.ua/laws/show/366-2021-%D1%80#Text>

164. <https://data.gov.ua/pages/835-recm-infrastructure-accessibility>

165. including over 16,000 educational institutions, 8,000 health care, structural units of the pension fund and social protection, civil defense facilities, employment centers, airports, and train stations



barrier-free, while 33% were partially barrier-free¹⁶⁶. However, these surveys rely on facility managers for data collection, raising concerns about reliability, as there is no accountability for submitting false information or mechanisms to verify data.

Building Codes and Licensing

State building codes include accessibility requirements for various construction projects. Significant updates to these codes were introduced in 2006¹⁶⁷, 2018¹⁶⁸, and most recently in 2022, focusing on the inclusiveness of buildings and structures. Despite these updates, non-compliance with construction standards persists. An increased capacity at local level as well as a stronger commitment is needed¹⁶⁹. Guidance for accessibility audits is under development by ministries such as the Ministry of Health (MoH) in collaboration with WHO, with the aim of creating standardized audit procedures. However, adherence to construction norms for all new and rehabilitated public infrastructure remains critical during the ongoing conflict.

Gaps in Licensing Requirements

While the government has strengthened binding accessibility requirements and liability for non-compliance through licensing conditions, gaps remain, as shown in the examples below:

Facility	License Requirement	Gap
Banks and Financial Institutions	Accessibility of physical facilities ¹⁷⁰	No requirements for accessible ATMs, mobile banking platforms, or staff training for disability support.
Educational Facilities	Accessibility requirements for school facilities ¹⁷¹	No inclusion of out-of-school or preschool institutions that serve children with disabilities.
Healthcare Facilities	Accessibility of buildings and premises ¹⁷² reported by providers ¹⁷³	Lack of enforcement of licensing conditions, leading to inaccessible healthcare facilities.

In 2020, OPDs documented widespread non-compliance with state construction norms during the *Large Construction Program*¹⁷⁴. Inspections revealed that none of the 45 sites assessed fully complied with state standards, and 10 were declared completely inaccessible¹⁷⁵. Similar issues persist in the reconstruction of new and existing buildings (See [Annex 5](#) for additional lawsuits on accessibility).

166. 27.10.2021 Regular meeting of the Barrier-Free Council // https://www.youtube.com/watch?v=N_wy6xOeM_E

167. Order of Ministry of construction, architecture and housing and communal services of Ukraine. On 02.11.2006. #365.

168. DBN V.2.2-40:2018 Inclusiveness of buildings and structures. Available at: https://dbn.co.ua/load/normativy/dbn/dbn_v_2_2_40/1-1-0-1832

169. Annex 10, Barrier-free meeting.

170. Resolution of the Board of the National Bank of Ukraine dated 22.12.2018 No. 149 "On Approval of the Regulation on Licensing of Banks"

171. License conditions of educational activity were approved by

172. Resolution of the Cabinet of Ministers of Ukraine No. 410 of April 25, 2018 "On contracts for medical care of the population under the medical guarantees program" // <https://zakon.rada.gov.ua/laws/show/410-2018-%D0%BF>

173. 27.10.2021 Regular meeting of the Barrier-Free Council // https://www.youtube.com/watch?v=N_wy6xOeM_E

174. 'In 2020, 71 reception departments of healthcare facilities, 101 sports facilities, and 114 schools were reconstructed or built as part of the President of Ukraine's Big Construction programme. The main objective of the project in 2021 is to build or reconstruct 6.6 thousand km of roads, 74 schools, 54 kindergartens, 28 medical institutions, more than 140 reception departments and 340 medical outpatient clinics in rural areas, 24 swimming pools and 78 other sports facilities.' // <https://bigbud.kmu.gov.ua/>

175. As part of the National Partnership - Coordinated Accessibility project implemented by the National Assembly of Persons with Disabilities, accessibility audits were conducted in 2021 at 45 Big Construction project sites in Chernivtsi, Cherkasy, Kherson, Kharkiv, Ivano-Frankivsk, Zaporizhzhia, Mykolaiv, Vinnytsia, Dnipro, Zhytomyr, Poltava, Donetsk, Sumy, Lviv and Rivne regions.



Since the start of Russia's full-scale invasion, environmental inaccessibility has further increased risks for persons with disabilities, severely limiting their coping mechanisms^{176 177}. Many collective sites¹⁷⁸ and bomb shelters are inaccessible despite existing regulations¹⁷⁹. The Camp Coordination and Camp Management cluster (CCCM) Cluster Vulnerability Study identified persons with disabilities and older people as the primary demographics of collective sites, underscoring the urgent need for accessibility improvements as required by Resolution 930.

'Shelter is a very painful topic. You cover yourself with a blanket at home and lie there, waiting for it to end... Once, we went to a clinic, and there was a very heavy bombing. We stood on the street and walked for about an hour because there was no way to go down to the shelter,'

participant of the validation session with a physical disability

Most shelters—including metro stations, basements, private homes, and industrial buildings—fail to accommodate persons with disabilities¹⁸⁰ putting them at additional risk during air raid alerts. For example, these shelters often cannot meet the needs of children and adults with complex disabilities or those with psychosocial and intellectual disabilities¹⁸¹. Targeted support, such as personal assistants and quiet spaces, is necessary to ensure the safety and well-being of these groups.

TRANSPORT

Legislative obligations regarding the accessibility of public transport are implemented too slowly. The Law of Ukraine "On the Fundamentals of Social Protection of Persons with Disabilities" from 2012 includes requirements for vehicles purchased, manufactured, or imported into Ukraine, as well as for infrastructure facilities and railway stations¹⁸², but OPDs noted a lack of accessibility to public transport.

The National Transport Strategy of Ukraine until 2030, "Drive Ukraine 2030,"¹⁸³ acknowledges the importance of expanding access to transport services for persons with disabilities and people with limited mobility. The strategy sets targets, including increasing the share of accessible vehicles to 50% by 2020 and ensuring that 60% of railway infrastructure and facilities are adapted by 2030. In line with this, Ukrzaliznytsia has developed a roadmap to gradually adapt railway services and stations by 2030¹⁸⁴. In 2018, the Procedure for holding a tender for the transportation of passengers on public bus routes was amended. The tender now requires that urban and suburban intraregional public bus routes include vehicles adapted for persons with disabilities and low-mobility groups. These vehicles were mandated to comprise up to 35% of the fleet by 2019 and 50% by 2020¹⁸⁵. Some regional state administrations have introduced measures such as providing free parking spaces for vehicles used by persons with disabilities. Additionally, certain territorial communities have implemented the "Social Taxi" service, offering transportation via special vehicles equipped with lifts.

176. Recommendations for ensuring the accessibility of temporary or permanent facilities accommodation for persons with disabilities. NGO "National Assembly of People with Disabilities of Ukraine" together with the NGO "PRO.UD/Universal Design" commissioned by UNDP. 2022. Available at: <https://shorturl.at/goGM9>

177. There is no obligation for developers to build modular houses in compliance with accessibility requirements Resolution No. 1340 of the Cabinet of Ministers of Ukraine "Some Issues of the Functioning of Architectural and Construction Control and Supervision Bodies" dated December 23, 2020, <https://zakon.rada.gov.ua/laws/show/1340-2020-%D0%BF#Text>

178. Collective sites as residential housing for IDPs under the current ongoing conflict.

179. CCCM cluster (2023): monitoring. Available here: https://www.cccmcluster.org/sites/default/files/2023-05/CCCM_2023_CSM%20R7_ukr.pdf

180. DBN V.2.2-5:2023 Protective structures of civil defense. Buildings and structures. Available here: <https://dbn.co.ua/load/normativy/dbn/1-1-0-390>

181. FFR (2022): Evacuation of people with disabilities. Analytical report.

182. Articles 26, 28 of the Law of Ukraine 'On the Fundamentals of Social Protection of Persons with Disabilities in Ukraine'.

183. Cabinet of Ministers of Ukraine, Order of May 30, 2018, No. 430-p On approval of the National Transport Strategy of Ukraine for the period up to 2030.

184. Schedule for the phased equipping of railway stations, stations and stopping points of JSC "Ukrzaliznytsia" with lifting platforms (mechanisms) for boarding/disembarking from/from the carriage of persons with disabilities who move in wheelchairs and other low-mobility groups of the population, tactile, visual and other accessibility elements, including audio signs, for 2020-2023

185. Resolution of the Cabinet of Ministers of Ukraine dated 03.12.2009 No. 1081 'On Approval of the Procedure for Holding a Tender for Passenger Transportation on a Public Bus Route' // <https://zakon.rada.gov.ua/laws/show/1081-2008-%D0%BF#Text>



Persistent Barriers

Despite these regulations, accessibility challenges remain significant. According to a 2021 report by the National Assembly of People with Disabilities (NAPD), 64% of persons with disabilities reported difficulties using transport infrastructure. Specific issues included¹⁸⁶:

- Unsuitability of public transport (71.9%),
- Inaccessibility of public transport stops (44.2%),
- Lack of elevators, ramps, and lowered curbs (31.4%),
- Unsuitability of underpasses (25.4%),
- Lack of assistance for boarding and disembarking (24.9%),
- Unsuitability of pedestrian paths (21.9%), and
- Lack of adapted toilets (18.2%).

These challenges have worsened since the full-scale invasion, with the lack of available transport and high transport costs further restricting access to essential services. According to findings from the Multi-Sector Needs Assessment (MSNA 2024), inaccessible transport continues to be a significant barrier. Participants in validation sessions emphasized issues with transport accessibility. In particular, transport systems lack features like text alerts for current and upcoming stops and accessible schedules, making it especially difficult for people with hearing impairments to navigate new routes or unfamiliar cities. Legal actions concerning inaccessible transport are documented in Annex 5a.

INFORMATION AND COMMUNICATION

The Law on Ukrainian Sign Language guarantees individuals in Ukraine the right to freely use Ukrainian Sign Language in public life, to learn and maintain it, and to access learning opportunities for Ukrainian Sign Language¹⁸⁷. As of this situational analysis, a draft law titled "On Ukrainian Sign Language" is under consideration by the Verkhovna Rada¹⁸⁸.

Accessibility in Public Broadcasting and Emergency Messaging

Article 18 of the Law of Ukraine "On Public Media" mandates that the National Public Broadcasting Company of Ukraine ensures the accessibility of its programs for persons with vision impairments and deaf people through audio description, subtitling, or sign language interpretation¹⁸⁹. At least 5% of the total broadcasting volume between 7 a.m. and 10 p.m. must be adapted, excluding commercial content. At the time of preparation of SitAn, there is no clear data on implementing this provision. Additionally, the Cabinet of Ministers of Ukraine requires¹⁹⁰ emergency messages to include sign language interpretation, subtitling, and audio commentary. These provisions were updated following the onset of the full-scale invasion to improve the accessibility of critical alerts¹⁹¹. The participants of validation sessions with hearing disabilities worried lack of accessible official information on the first stages full scale invasion.

186. NAPD: Two-thirds of people with disabilities face difficulties in transport. Available [here](#)

187. Article 4. Law of Ukraine "On ensuring the functioning of the Ukrainian language as the state language". <https://zakon.rada.gov.ua/laws/show/2704-19#n45>

188. http://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=67223

189. Law of Ukraine "On Public Media of Ukraine" <https://zakon.rada.gov.ua/laws/show/1227-18#Text>

190. Paragraph 18 of the Resolution of the Cabinet of Ministers of Ukraine "On Approval of the Regulation on the Organization of Notification of the Threat of Occurrence or Occurrence of Emergencies and the Organization of Communication in the Field of Civil Protection" No. 733 of September 27, 2017

191. Paragraph 18 of the Res. of the Cabinet of Ministers of Ukraine "On Approval of the Regulation on Early Warning in Emergency Situations and Communication in regards to Civil Protection" No. 733 of September 27, 2017. <https://zakon.rada.gov.ua/laws/show/733-2017-%D0%BF#Text>



Legal Requirements and Implementation

While the government has formally recognized the need for accessible information in public services, courts, elections, and television¹⁹², legal requirements do not extend to private internet providers or broadcast media. Sign language interpretation and captioning remain limited, often provided by companies as part of corporate social responsibility initiatives¹⁹³, according to OPDs. Penalties for non-compliance with accessibility laws are insufficient and lower than the standard costs of hiring a sign language interpreter or content manager¹⁹⁴. Participants in validation sessions, particularly sign language users, emphasized the lack of sign language interpretation in essential services, including medical facilities, public transport, shops, and police stations.

‘The provision of interpreters should be stipulated in the law. It is very difficult for us without interpreters. It happens that interpreters are overworked, late, do not come to meetings,’

participant of validation session.

In 2023, the government began developing simple language and easy-to-read formats, adopting a decree recommending their use by public authorities¹⁹⁵. However, OPDs have criticized the lack of concrete steps to implement these recommendations. For instance, while requirements were introduced to make the Unified State Web Portal of Electronic Services "Diia" accessible to persons with disabilities^{196 197}, further progress remains limited.

Accessibility of Government and Business Information

In 2019, the government established accessibility requirements for executive authority websites, which were updated in 2023 to align with European standards and extended to other public information products¹⁹⁸. However, monitoring by UNDP and the Ministry of Digital Transformation in 2023 revealed that only one in five government websites is accessible to persons with disabilities¹⁹⁹. Participants in validation sessions also highlighted issues such as inaccessible messages from government officials on social media, and inaccessible mobile applications, such as Uklon, from businesses claiming to be inclusive. Reports from the Ombudsman also reveal that information on shelter maps, alerts, and official announcements is often inaccessible to persons with disabilities²⁰⁰, despite relevant legal norms existing since 2017²⁰¹ (For relevant lawsuits against inaccessible information see Annex 6). As a result,

192. Cabinet of Ministers of Ukraine. On approval of the National Strategy for the Creation of a Barrier-Free Environment in Ukraine for the period up to 2030. Resolution No. 366 of April 14, 2021

193. Proposals of Fight For Right as a part of the preparation of lists of issues under the simplified reporting procedure to the Government of Ukraine during the 22nd session of the Committee on the Rights of Persons with Disabilities (September 2019). Available [here](#)

194. Ibid.

195. Order of the Cabinet of Ministers of Ukraine No. 1046-r (17.11.2023) "On Approval of Recommendations on Presentation of Information by Public Authorities in Formats Ensuring Accessibility" // <https://zakon.rada.gov.ua/laws/show/1046-2023-%25D1%2580#Text>

196. Website: <https://diia.gov.ua/>

197. "in particular for persons with visual, hearing, musculoskeletal, speech and intellectual disabilities, as well as with various combinations of impairments." // Cabinet of Ministers of Ukraine, Resolution of December 4, 2019, No. 1137 "Issues of the Unified State Web Portal of Electronic Services and the Register of Administrative Services". Available at: <https://zakon.rada.gov.ua/laws/show/1137-2019-%D0%BF#Text>

198. On July 21, 2023, the Resolution of the Cabinet of Ministers of Ukraine No. 757 "Some Issues of Accessibility of Information and Communication Systems and Documents in Electronic Form" was adopted. In accordance with accessibility requirements, government websites and mobile applications must meet accessibility requirements in accordance with DSTU EN 301 549:2022. This resolution is based on EU Directive 2016/2102, and DSTU is based on the European standard EN 301 549.

199. "In 2023, 22% of the analyzed government websites have a sufficient and high level of accessibility for people with disabilities, "4% have a high level of basic accessibility — 1% more than in 2022; 18% — sufficient level — 1% more than in 2022 and 6% more than in 2021; 51% — average — 2% less than in 2022; 27% is a low level — the same as in 2022 and 12% less than in 2021." // <https://thedigital.gov.ua/news/kozhen-pyatiy-derzhavniy-sayt-dostupniy-dlya-lyudey-z-invalidnistyu?fbclid=IwAR11jdjXedU0-w236c-amJJEBIta4XQqimt4wmkikMDKbZZgk6-CqWciwpw>

200. Office of the Ombudsman of the Verkhovna Rada of Ukraine, UNPRPD "Assessing the Availability of Information and Notification in Crisis Situations and the Humanitarian Response Process" <https://www.undp.org/sites/g/files/zskgke326/files/2023-03/AssessmentAccessibility.pdf>

201. There are brief instructions on how to implement the accessibility of information for people with visual and hearing impairments. They mention sign language accompaniment for audio information, and audio commentary for visual information. Less attention is paid in the legislation of Ukraine to



OPDs have taken on a significant role in informing and supporting persons with disabilities²⁰², especially during the humanitarian crisis. People with disabilities increasingly rely on OPDs for accurate information, while local authorities depend on OPDs to reach, evacuate, and support individuals with disabilities.

5. Inclusive Services

DETERMINING DISABILITY – THE ASSESSMENT SYSTEM

Since the ratification of the UNCRPD in 2009, the Ukrainian government has expressed a commitment to transitioning from a medical to a social model of disability. However, until 2020, the primary standardized entry point for accessing rehabilitation services, assistive products, and social benefits remained assessment process which is largely based on the medical model of disability-assessment²⁰³. It grants individuals or children (0 – 18 years old) a legal disability status in one of three groups (I, II, or III). The Law on Rehabilitation continues to define disability contrary to the UNCRPD as "a measure of health loss due to disease, trauma (or its consequences), or inherited defects that, in interaction with the environment, may lead to limitations in life ability." This definition has been criticized by OPDs for maintaining a medical view of disability. Assessments are conducted by the Medical and Social Expertise Commission (MSEC) for adults above 18 years old and the Physician Consultation Commission (PCC) for children, with approved disability status leading to the creation of an Individual Program of Rehabilitation (IPR) specifying the types of rehabilitation needed.

During preparation of this report, the MSEC consisted of at least:

- three specialist doctors (e.g. eye doctor, surgent, ear doctor) based on the approved MOH list
- rehabilitation specialist and psychologist.²⁰⁴
- In some cases, representatives from the pension fund and employment service.

In January 2025 the MSEC commission (not the PCC) has been stopped by the MoH due to changes within the law (see above). There has been a new commission established to determine disability for adults working directly in hospitals. The commission aims to assess personal daily functioning. This change is temporary, as MoH is preparing the draft law to implement ICF and a new disability assessment system for all people with disabilities by July 2025. Currently, the focus is on 'disability by birth', due to 'accidents or other illnesses or due to war'²⁰⁵, rather than the individual.

The medical model remains dominant in legislation, which defines disability as "a measure of health loss."^{206 207} This definition is based on the outdated WHO International Classification of Impairments,

the accessibility of information for persons with physical, mental, and intellectual disabilities. // Resolution of the Cabinet of Ministers of Ukraine "On Approval of the Regulation on the Organization of Notification of the Threat of Occurrence or Occurrence of Emergencies and the Organization of Communication in the Field of Civil Protection" No. 733 dated September 27, 2017 <https://zakon.rada.gov.ua/laws/show/733-2017-%D0%BF#Text>

202. For Right team set up a hotline to provide counselling and psychological support so that the organization's team has been in touch with those who need help. Similarly, representatives of the NAPD and the Luhansk regional NGO 'Association of Women, Youth, Families with Disabilities of Eastern Donbas - East' joined the hotline of the Office of the Government Commissioner for Disability. // NAPD (2022): <https://naiu.org.ua/archives/news/tetyana-barantsova-neobhidno-pidtrymuvaty-odyn-odnogo-yak-zaraz-pidtrymuvat-ukrayintsiv-v-usomu-sviti>

203. 8 types of rehabilitation for persons with disabilities were determined by the LoU: medical rehabilitation, medical-social rehabilitation, social rehabilitation, psychological-pedagogical rehabilitation, physical rehabilitation, professional rehabilitation, labor rehabilitation, physical culture and sport rehabilitation <https://zakon.rada.gov.ua/laws/show/2961-15/ed20200101#Text>

204. As per CMU regulation: <https://zakon.rada.gov.ua/laws/show/1317-2009-n#Text>

205. Art. 7 of the Law of Ukraine 'On Rehabilitation of Persons with Disabilities in Ukraine'. // <https://zakon.rada.gov.ua/laws/show/2961-15#Text>

206. Article 3 of the Law of Ukraine 'On the Fundamentals of Social Protection of Persons with Disabilities in Ukraine'.

207. Article 1 of the Law of Ukraine 'On Rehabilitation of Persons with Disabilities in Ukraine'. // <https://zakon.rada.gov.ua/laws/show/2961-15#Text>



Disabilities, and Handicaps (ICIDH)^{208 209}. Participants in validation sessions and OPDs have expressed concerns that individual needs are often overlooked during assessments, even under current reform processes²¹⁰.

The criteria of Disability determination assessment are common for all persons with disabilities. But Ukrainian social protection systems (payments and social preferences and guarantees) are mostly based on the cause of disability. Causes include general illness, childhood disability, occupational disease, and injuries related to military service, Chernobyl, or other specific events²¹¹. The identified cause of disability influences the amount of social benefits. Since 2022, new categories have been introduced for injuries sustained during the war, such as "injury while defending the homeland" and "injury from explosives." Civilians injured by explosives may be categorized²¹² as either:

- A person with a disability due to war^{213 214}, or
- A person injured by explosive devices²¹⁵.

The guarantees and benefits^{216 217 218} for these categories vary significantly, with higher guarantees for war-related disabilities²¹⁹. However, war-related disability status is restricted to individuals injured in active conflict zones²²⁰. OPDs report that since 2014, approximately 250 civilians have been granted war-related disability status^{221 222}. For veterans, confirming injuries sustained during service involves lengthy and complex documentation procedures, which are central to obtaining war-related disability status²²³. Disability assessments and related processes face multiple barriers, including:

- Lack of awareness about required documentation (29.9%)²²⁴,
- Perceived corruption in MSEC and PCC processes,
- Limited availability of assessment facilities, particularly in rural areas²²⁵, and
- Overloaded commissions affecting the quality of assessments and the development of Individual Rehabilitation Program (IPR).

Participants in validation sessions emphasized these challenges, which complicate access to assessments. In addition to determining disability status, the MSEC assesses the need for third-party

208. The ICIDH [International Classification of Impairments, Disabilities and Handicaps] and development of disability statistics / submitted by the United Nations Statistical Division and World Health Organization. Geneva : UN, 5 Apr. 1994. 15 p.

209. Resolution of the Cabinet of Ministers of Ukraine of 3 December 2009, No. 1317 'Issues of medical and social expertise'.

210. Ibid.

211. Ibid.

212. Civilian Ukrainians who suffered during the full-scale war are entitled to have two causes of disability established. [https://moz.gov.ua/article/news/civilni-ukrainci-jaki-postrazhdali-pid-chas-povnomasshtabnoi-vijni-majut-pravo-na-vstanovlennja-dvoh-prichin-invalidnosti-](https://moz.gov.ua/article/news/civilni-ukrainci-jaki-postrazhdali-pid-chas-povnomasshtabnoi-vijni-majut-pravo-na-vstanovlennja-dvoh-prichin-invalidnosti)

213. Article 7 of the Law of Ukraine 'On the Status of War Veterans and Guarantees of Their Social Protection' <https://zakon.rada.gov.ua/laws/show/3551-12#Text>

214. Resolution of the Cabinet of Ministers of Ukraine of 25 April 2018 No. 306 'Some issues of establishing the connection between disability and injuries or other health damage' <https://zakon.rada.gov.ua/laws/show/306-2018-%D0%BF#Text>

215. Paragraph 19-5 of the Regulation on the Procedure, Conditions, and Criteria for Establishing Disability, approved by the Cabinet of Ministers of Ukraine on 3 December 2009, No. 1317 'Issues of Medical and Social Expertise' <https://zakon.rada.gov.ua/laws/show/1317-2009-%D0%BF#Text>

216. Article 10 of the Law of Ukraine 'On Mine Action in Ukraine' <https://zakon.rada.gov.ua/laws/show/2642-19#Text>

217. Resolution of the Cabinet of Ministers of Ukraine of 29 September 2021 No. 1020 'Some Issues of Appointment and Payment of One-time Compensation and Annual Allowance Provided for by the Law of Ukraine 'On Mine Action in Ukraine' <https://zakon.rada.gov.ua/laws/show/1020-2021-%D0%BF#Text>

218. Article 13 of the Law of Ukraine 'On the Status of War Veterans, Guarantees of Their Social Protection' <https://zakon.rada.gov.ua/laws/show/3551-12#Text>

219. Joint NGO report "Situation on the Rights of Persons with Disabilities in Ukraine" JULY 2024 https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/SessionDetails1.aspx?SessionID=2691&Lang=en

220. Ibid.

221. Injured Ukrainian civilians: a difficult experience of struggle <https://hubz.ua/ekspertna-dumka/interv-yu/postrazhdali-tsyvilni-ukrayintsi-skladnyi-dosvid-borotby/>

222. For civilians: how to get the status of a person with a disability caused by war <https://ehrh.org/dlya-cyvilnyh-yak-otrymaty-status-osoby-z-invalidnistyu-vnaslidok-vijny/>

223. <https://minre.gov.ua/2024/06/24/procedura-otrymannya-statusu-osoby-z-invalidnistyu-vnaslidok-vijny-potrebuye-sproshhennya/>

224. Analytical description of the participants' responses to the survey on their interaction with the MSEC. <https://ls.org.ua/wp-content/uploads/2023/09/kopiya-rekomendaciyi-kopiya-1.pdf>

225. Ibid.



care and supervision as well as the degree of professional capacity loss. The MSEC also evaluates the requirement for rehabilitation measures and assistive aids, which are formalized into an Individual Rehabilitation Program (IRP) for individuals with a recognized disability. Prior to the full-scale invasion, the IRP was reviewed every two years²²⁶. However, this review process has been suspended since 2022.

Since the invasion, the government has introduced procedural adjustments for disability determination, including:

- Allowing MSEC to decide on disability in absentia,
- Enabling assessments regardless of registration or residence,
- Postponing follow-up assessments until after martial law ends, and
- Conducting examinations at servicemen's locations or during treatment and rehabilitation²²⁷.

In 2022, visits to patients' homes, medical, and rehabilitation institutions to establish disability accounted for 15.6% of all examinations in Ukraine²²⁸.

After the assessment and the 'granting' of the disability status, there are social payments and social services available based on needs. For the former you apply to the local social department. For the latter, a social work specialist, social worker, or social manager assesses the needs of individuals and families for social services²²⁹, often leading to discrepancies with MSEC conclusions due to different criteria and tools for assessment²³⁰. These inconsistencies highlight the need for:

- Unified assessment criteria for disability-related support, and
- Clear delineation of responsibilities between MSEC and social protection authorities.
- Progress toward a Functional Approach

Amendments to legislation, including the implementation of the ICF, are under development²³¹ planned till July 2025. While the introduction of the ICF was included in the 2017 Action Plan, progress remains limited²³². OPDs have noted inaccuracies in the ICF's translation and criticized the slow pace of its implementation²³³.

The Law of Ukraine "About Education" (2017)²³⁴ introduced principles of inclusive education and a new status for persons with "special education needs." It also mandated the development of an Individual Program of Development (IPD) for each student. These programs are implemented by teams of special education professionals at Inclusive Resource Centers (IRC)²³⁵, though rehabilitation professionals are notably absent from these teams.

226. Paragraph 14 of the Regulation on Individual Rehabilitation Programmes approved by the Cabinet of Ministers of Ukraine on 23 May 2007, No. 757.

227. MoH: How the simplified disability procedure works for servicemen. Article [here](#)

228. Article 13 of the Law of Ukraine 'On the Status of War Veterans, Guarantees of Their Social Protection' <https://zakon.rada.gov.ua/laws/show/3551-12#Text>

229. Article 20 of the Law of Ukraine 'On Social Services' <https://zakon.rada.gov.ua/laws/show/2671-19#Text>

230. Link access [here](#)

231. Ukrainian version of ICF. // <https://moz.gov.ua/uk/mkf> The reforms are being implemented, among other things, in accordance with the Action Plan to change the assessment of needs and the mechanism for their provision for people with limited daily functioning and to reform the conduct of medical and social expertise in Ukraine. <https://zakon.rada.gov.ua/laws/show/483-2023-%D1%80#Text>

232. The Action Plan for the Implementation of the International Classification of Functioning, Disability and Health in Ukraine and the International Classification of Functioning, Disability and Health of Children and Adolescents was approved by the Cabinet of Ministers of Ukraine on 27 December 2017, No. 1008-p. // <https://zakon.rada.gov.ua/laws/show/1008-2017-%D1%80#Text>

233. FFR (2023): ICF translation demands.

234. LoU About Education: <https://zakon.rada.gov.ua/laws/show/2145-19/ed20170905#Text>

235. This assessment is a 'collection and interpretation of information about the peculiarities of a person's development in order to determine his/her special educational needs and identify his/her educational difficulties, develop recommendations for his/her individual educational trajectory, modification or adaptation of the educational program (subjects), organization of the educational environment, peculiarities of the organization of psychological and pedagogical, correctional and developmental services' Regulation on Inclusive -resource centre was adopted by Cabinet of Ministers Order #545 dated <https://zakon.rada.gov.ua/laws/show/545-2017-%D0%BF#Text>



In 2020, the Law of Ukraine "About Rehabilitation in Healthcare" established a legal framework for rehabilitation services within the healthcare sector. As of May 2024, however, MSEC's disability assessment system continues to be primarily driven by a medical approach, with reforms still under discussion. The current system encompasses several types of assessments, including:

- Determining disability status and group by MSEC,
- Multidisciplinary team assessments for rehabilitation services in healthcare,
- Assessments for social service provision,
- Comprehensive assessments to identify special educational needs, and
- Military medical commission assessments for determining suitability for military service.

While multidisciplinary rehabilitation teams exist to support a more functional approach, their work primarily focuses on inpatient settings. Data on their effectiveness for individuals without injuries or active health conditions is limited²³⁶.

SPECIALIZED SUPPORT SERVICES: COMMUNITY-BASED SUPPORT

Ukrainian legislation formally guarantees the availability of social services for persons with disabilities²³⁷, aiming to provide these services at the community level²³⁸. These include:

- Home care,
- Daycare,
- Supported living,
- In-kind assistance,
- Physical support for individuals with musculoskeletal disorders who use wheelchairs,
- Services for individuals with visual impairments,
- Sign language interpretation,
- Family-like care and education for children, and
- Support during inclusive education.

An OPD report indicates that over 50% of the 37 social services designated for individuals and families in difficult life circumstances are specific to persons with disabilities. Key services²³⁹ include:

- Supported accommodation for older people and persons with disabilities,
- Residential care,
- Social support for employment and workplace adaptation,
- Daycare for children with disabilities,
- Transport services,
- Sign language interpretation, and
- Personal assistant services.

236. For example. More than 400 servicemen in the first 7 months of 2023 underwent rehabilitation at the Dnipro RECOVERY Centre <https://doz.zoda.gov.ua/news-deialnist/3766-ponad-400-vijskovosluzhbovtziv-za-pershi-7-misyatsiv-2023-roku-projshli-reabilitatsiyu-v-dniprovskomu-tsentri-recovery>. A network of free rehabilitation centers is being set up in Ivano-Frankivsk Oblast <https://suspilne.media/595847-v-ivano-frankivskij-oblasti-stvoruut-merezu-bezkostovnih-reabilitacijnih-centriv/>

237. Article 16 of the Law of Ukraine 'On Social Services', enacted on 1 January 2018. <https://zakon.rada.gov.ua/laws/show/2671-19#Text>

238. Clause 4 of part four of Article 11 of the Law of Ukraine 'On Social Services'. The procedure for organising the provision of social services stipulates that the provision of basic social services is entrusted to city, village, settlement councils (the level of territorial communities)

239. NAPD (2022): Report on access to benefits and services established by law for children with disabilities and their families. Report: [Here](#)



However, the availability of social services is often contingent on the economic capacity of local communities²⁴⁰. Financial and institutional barriers, such as a lack of specialists²⁴¹, have worsened since the full-scale invasion due to reduced local budgets, an increased number of IDPs requiring services, and the departure of service providers from insecure areas²⁴². The most challenging services for communities to provide include²⁴³:

- Supported living,
- Daycare and day-stay facilities,
- Support during inclusive education,
- Physical support for persons with disabilities, and
- Sign language interpretation (offered in only about 50 communities, or 3%, in 2022)²⁴⁴.
- Family Support and Institutionalization Risks

Validation sessions emphasized the critical role of family and individual home and community-based support in avoiding institutionalization. Still, key services like daycare, inclusive employment opportunities, and personal assistant programs for individuals with intellectual disabilities are not included in the list of basic social services. Budget cuts to grassroots organizations providing care for people with intellectual disabilities further increase the risk of institutionalization²⁴⁵.

Additionally, persons with disabilities report the following barriers in accessing social services:

- Inadequate information: Communities often fail to provide accessible information about available services, with providers neglecting to use accessible languages and communication formats^{246 247}.
- Inaccessible premises: Many services are offered in premises that are physically inaccessible, such as on upper floors without elevator access^{248 249}.
- Regulatory delays: Slow approval of national regulations affects needs-based and effective service provision. Recent appeals to social protection services at community level show this is affecting family members of men of military age²⁵⁰.
- Quality concerns: Inadequate professional training of providers and the absence of a feedback system hinder the quality of services²⁵¹.

Monitoring and Oversight

The National Social Service (the Central body which is coordinated by CMU through the Minister of Social Policy) is responsible for monitoring compliance with social standards for service provision²⁵².

240. Social services for female and male veterans in communities: https://cedos.org.ua/wp-content/uploads/soczposlugy_digital.pdf

241. FFR (2020): difficulties with providing the same social services throughout the community; if there are problems with public transport: people cannot get to providers and social workers cannot get to recipients; lack of social and accessible transport for people with disabilities; insufficient number of premises for the provision of social services and overload of existing social workers (lack of qualified personnel).

242. The full-scale invasion also reduced the capacity of communities to provide social services in 2022-2023: an increase in the number of older people in need of care services; an increase in the number of people seeking financial assistance; and additional costs for the military (financial assistance to the wounded from the community, payment of assistance to people who have been mobilised; involvement of social service providers in the distribution of humanitarian aid, which increases their workload; specialists leaving communities due to security issues; increased need for psychological assistance)

243. FFR (2020): Stakeholder mapping.

244. <https://www.msp.gov.ua/news/23429.html>

245. Positions of people with intellectual disabilities, their parents and relatives taken from validation sessions.

246. We learn from each other that we can get this or that service,' says a participant in the validation session.

247. The information is based on the results of a quick survey conducted by FFR in early July 2024. The survey involved 45 people - 39 people with disabilities, 7 mothers of children with disabilities.

248. It is not possible to use the services of a hairdresser, for example, because the service providers are located on the second floor,' (participant in validation session)

249. survey conducted by FFR in early July 2024

250. Ibid.

251. survey conducted by FFR in early July 2024

252. <https://nssu.gov.ua/>



Although evaluation results have been published on the MoSP website²⁵³, the need for improved monitoring by multiple stakeholders is evident. Additionally, appeals to social protection services at community level from persons with disabilities have highlighted obstacles in processing care service documents for family members of men of military age²⁵⁴.

DEINSTITUTIONALIZATION EFFORTS

Efforts to transition from institutional care to community-based supported living in Ukraine have faced significant challenges and delays. Disability advocacy gained momentum prior to the 2014 military incursion, with OPDs raising national and international awareness about the growing prevalence of institutionalization²⁵⁵, particularly in rural and low-resource areas.

Children's Deinstitutionalization

In 2017, the Cabinet of Ministers approved the National Strategy for Reforming the System of Institutional Care and Upbringing of Children (2017–2026), accompanied by an action plan for phased implementation²⁵⁶. However, OPDs expressed concerns about its slow progress and unexplained delays²⁵⁷. Publicly available data on early deinstitutionalization efforts remains scarce, despite rising numbers of children entering institutional care.

Due to sustained pressure from OPDs and international organizations, some progress has been made:

- The institutionalization of children under the age of three has been banned.
- Plans to phase out residential educational institutions by 2026 were developed, though they remain unimplemented due to ongoing conflict and a lack of alternative long-term care options (see Section 6)
- In 2023, the Coordination Centre for the Development of Family Education and Child Care was established as an advisory body to the Cabinet of Ministers²⁵⁸. By June 2024, a draft Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment was published²⁵⁹. While promising, this document does not adequately address gaps and needs specific to children with disabilities.

The MoSP noted that as of January 1, 2024, there were 21.345 children in institutions providing institutional care and education (15.260 children in educational institutions, 1.694 children in health care institutions, 3.513 children in social protection institutions, and 878 children in private institutions), including children temporarily displaced (evacuated) abroad. In addition, 5.003 children receiving institutional care and education have a diagnosed disability (35433 children are in educational institutions, 469 children are in health care institutions, 1.085 children are in social protection institutions, and 16 children are in private institutions)²⁶⁰. During the UNCRPD Committee session (August 2024) the Government representatives provided some other data. Around 34.000 children in special schools, around 40.000 children in inclusive education and more than 4.000 children in special classes secondary schools.

253. <https://www.msp.gov.ua/timeline/?t=171&from=&till=&m=19#tagpanel>

254. Ibid.

255. FFR (2022): Alternative Report on implementing UNCRPD // <https://ffr.org.ua/wp-content/uploads/2022/10/CRPDalternativereport.pdf>

256. The Strategy was approved by the Order of the Cabinet of Ministers of Ukraine dated August 9, 2017, No. 526-p

257. FFR (2022): Alternative Report on implementing UNCRPD

258. CMU Resolution of 26 May 2023 No. 538 'On the Establishment of the Coordination Centre for the Development of Family Education and Child Care' // <https://zakon.rada.gov.ua/laws/show/538-2023-%D0%BF#Text>

259. Draft Order of the Cabinet of Ministers of Ukraine 'On Approval of the Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment for 2024-2028' // <https://www.msp.gov.ua/projects/892/>

260. Draft of CMU order «On approval of the Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment for 2024-2028»



Disparities in Funding and Family Support

CSOs have highlighted significant disparities in funding between institutional care and home-based support. Institutionalized children receive government funding exceeding \$500 per month, while families caring for children with high support needs in the community receive less than \$300 per month. One NGO representative noted, “The government continues to support institutions at the expense of families, creating incentives to give up children and place them in institutions. It is impossible to provide everything that is needed with the resources we have available”²⁶¹. Economic hardships have further deteriorated conditions for families raising children with disabilities. Another NGO stated, “Economic hardship has hit families caring for children with disabilities in the community especially hard, despite extensive international funding nearly a year into the war.” In addition, access to essential services has also declined²⁶²:

- Before the war, 79.7% of families caring for children with disabilities had access to rehabilitation services; this dropped to 47.2% within 10 months of the conflict.
- Parents reported unmet needs, including psychological support (69%) and assistance with socialization for their children (81%).
- Nearly half lacked access to education, rehabilitation, or occupational therapy, and,
- 25% cited barriers to accessible environments, transportation, assistive devices, daycare, and basic medical care.

Adults with Disabilities

Adults with disabilities requiring independent living support and long-term care have received limited attention until recently²⁶³, with their inclusion in the National strategy of Reforming institutions and deinstitutionalization till 2034²⁶⁴. Currently, 259 public institutional care facilities house 37,709 adults, including individuals with disabilities, neuropsychiatric conditions, and older persons needing care²⁶⁵. These institutions cater to a wide range of functional limitations and needs but do not provide opportunities for self-directed care or individual choice in care plans. The formal decision of institutionalization is taken by the individual or their guardian (including for children or people deprived of legal capacity). In practice this decision can be influenced by the lack of services, existing stigma, lack of awareness of disability rights, lack of housing, etc. - worsened by the war. There is an urgent need to evaluate the entire institutional care system—spanning public and private institutions—and to align care modalities with international best practices and obligations under Article 19 of the UNCRPD. UNICEF and WHO are assisting the Ministry of Social Policy (MoSP) in drafting a deinstitutionalization strategy and action plan that covers all life stages. Various assisted living pilot projects at community level do meaningfully align with the UNCRP. For example, NGO Rodina (Kyiv oblast), Social Synergy (Chernivtsi) or Dream Workshop (Lviv). At the time of finalizing the SitAn, these pilots are still in progress, but could be used for lessons learnt, upscaling and overall inform DI programming.

261. Alternative Report on the implementation of The Convention on the Rights of Persons with Disabilities in Ukraine. / Disability Rights International. https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCRPD%2FCSS%2FUkr%2F59195&Lang=en

262. Ibid.

263. development of various community-based services (social services, mental health, accessibility). If these initiatives were successfully implemented, it would theoretically be possible to reduce the number of people with disabilities entering institutional care for the first time; there are no measures aimed specifically at diverting people from the residential system; when it comes to the development or implementation of new social services, only ‘supported living’ is usually mentioned, and this is a rather risky tendency to narrow the understanding of the complexity of the deinstitutionalisation process. // Stakeholder mapping - deinstitutionalisation in Ukraine // <https://ffr.org.ua/wp-content/uploads/2024/04/MAPUVANNYA-ZATSIKAVLENYH-STORIN-DEINSTYTUTSIONALIZATSIIYA-V-UKRAYINI.pdf>

264. The Strategy was adopted by CMU Order.

265. According to the Ministry of Social Policy, as of the beginning of 2024, there are: 145 psychoneurological boarding schools with 24086 residents; 56 residential care homes for the elderly and people with disabilities, where 8171 people live; 21 boarding houses for war and labour veterans, with 2573 residents; 1 special residential care home for 66 people; 36 youth departments in children's homes with a total of 2813 residents. // Theory of change - Deinstitutionalisation is possible // <https://ffr.org.ua/wp-content/uploads/2024/06/Teoriya-zmin-deinstytutsionalizatsiya-mozhlyva.pdf>



Challenges

The full-scale invasion has compounded challenges, with widespread destruction of homes and continued internal displacement. Nearly 65% of persons with disabilities report barriers to independent living, including²⁶⁶:

- Inaccessible architecture, transportation, and information,
- Overt discrimination against persons with disabilities, and
- Insufficient community-based social services and adapted living structures.

As a result, many individuals with disabilities have resorted to institutionalized care for the first time. During the first year of the conflict (2022–2023), institutional residency increased by approximately 7,790 adults, including an estimated 4,553 internally displaced persons with disabilities²⁶⁷.

Despite these challenges, the Government of Ukraine has prioritized rebuilding destroyed institutional facilities over investing in community-based living options. For example, instead of utilizing the requested \$127.5 million for accessible community living, funds have been allocated to restoring residential institutions²⁶⁸. International organizations and donors have similarly supported capacity building for institutional facilities and group homes resembling institutional models, diverting resources from deinstitutionalization efforts²⁶⁹. To date, the government has spent more on restoring institutional facilities than on creating conditions for independent living and supporting community-based living initiatives.

6. Mainstreaming Disability Issues

HEALTH

Ukraine's healthcare system reform is guided by several key principles, including:

- Bringing primary healthcare closer to the population,
- Expanding the private sector,
- Developing a national rehabilitation system with greater inclusion of persons with disabilities, including access to vocational rehabilitation, and
- Transforming state medical services with the principle of “money follows the patient.”

Accessibility and Sign Language Interpretation

Since 2022, healthcare institutions are required to provide documentation confirming the availability of Ukrainian Sign Language interpretation²⁷⁰. According to the Ministry of Health (MoH), 87 facilities in Kharkiv provided this service before the full-scale invasion²⁷¹. Mobile communication programs

266. The information is based on the results of a quick survey conducted by FFR in early July 2024. A total of 45 people took part in the survey - 39 people with disabilities, 7 mothers of children with disabilities.

267. Theory of change - Deinstitutionalisation is possible // https://ffr.org.ua/wp-content/uploads/2024/06/Teoriya-zmin_deinstytutsionalizatsiya-mozhlyva.pdf

268. Rapid Damage and Needs Assessment February 2022 – February 2023 // <https://ukraine.un.org/sites/default/files/2023-03/P1801740d1177f03c0ab180057556615497.pdf>

269. Alternative Report on the implementation of The Convention on the Rights of Persons with Disabilities in Ukraine. / Disability Rights International. https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCRPD%2FCSS%2FUKR%2F59195&Lang=en

270. Resolution of the Cabinet of Ministers of Ukraine dated 09.08.2021 No. 820 'On Amendments to the Resolutions of the Cabinet of Ministers of Ukraine dated 25 April 2018 No. 410 and 15 February 2021 No. 133' // <https://zakon.rada.gov.ua/laws/show/820-2021-%D0%BF#Text>

271. 27.10.2021 Hearing on Barrier-Free Council // https://www.youtube.com/watch?v=N_wv6xQeM_E



offered by the Ukrainian Society of the Deaf also serve as an alternative²⁷². However, validation sessions revealed gaps in the regulation's implementation. Many facilities lack sign language interpreters, and MoH efforts to ensure accessibility remain insufficient.

Barriers to Accessible Healthcare

Accessibility in healthcare is regulated through a mandatory accreditation process every four years²⁷³. Despite this, significant barriers persist, as a pre-war survey showed that 68% of respondents could not receive medical services independently without accompaniment²⁷⁴. Specific barriers include:

1. **Physical Accessibility:** Local officials often measure accessibility through elements (for example a ramp) rather than comprehensive standards²⁷⁵.
2. **Denial of Services:** Reports indicate that some individuals with disabilities were refused medical care due to physical inaccessibility or staff unwillingness to accommodate their needs. For example, residents in the Vinnytsia region reported being denied services explicitly because of their disability.
3. **Specialized Equipment:** Many healthcare facilities lack gynecological chairs suitable for women who use wheelchairs, a problem confirmed during validation sessions²⁷⁶.

That being said, it is important to consider that the healthcare system has faced unprecedented challenges since the invasion. Rehabilitation teams at hospitals are overwhelmed, and the number of trained staff remains insufficient, while Russian attacks have damaged over 1,200 healthcare facilities, with 190 destroyed entirely^{277 278}.

In 2023, the government presented a **Healthcare Recovery Plan**²⁷⁹, prioritizing psychological support and rehabilitation services. These are critical to addressing the needs of persons with disabilities and those who have acquired disabilities due to the war. Additionally, at the end of 2022, the **Medical Guarantees Program** was amended²⁸⁰ to address health issues caused by the war. New packages of free medical services provided by National Health Service Ukraine (NHSU) were introduced, including:

- Mental health support and treatment²⁸¹, and
- Comprehensive inpatient rehabilitation assistance.

The procedures for accessing these services have been simplified^{282 283}. However, the ongoing reform of rehabilitation services has created a parallel system alongside the existing MSEC identification process (details see [section 5](#)). While the reform emphasizes environmental adjustments and multidisciplinary team support, the older system remains rooted in a medical approach focused on benefits rather than rights. OPDs are divided in their support for the two systems, which despite various reasons, may be related to accessing government funding at individual level.

272. Protecting health: cooperation between UDS and medical institutions in Ukraine

<https://utog.org/chim-zajmaetsia-utog/na-zahisti-zdorov%E2%80%9999ia-spivpracia-utog-z-medichnimi-zakladami-ukraini>

273. Resolution of the Cabinet of Ministers of Ukraine No. 765 of July 15, 1997, On Approval of the Procedure for Accreditation of a Health Care Institution <https://zakon.rada.gov.ua/laws/show/765-97-n#Text>

274. Inclusion and equality. Monitoring the Inclusion of the Standards of the UN Convention on the Rights of Persons with Disabilities to the "National Strategy in the Field of Human Rights" and Other Long-Term Solutions in Ukraine (Report of Public Associations of People with Disabilities. // https://naiu.org.ua/wp-content/uploads/2020/03/NAIU-Report_Web.pdf

275. Letter of the Zhytomyr Oblast State Educational Institution

276. Ibid.

277. Number of hospitals in Ukraine were destroyed as a result of the war <https://www.slovoudilo.ua/2023/02/13/novyna/bezpeka/stalo-vidomo-skilky-likaren-ukrayini-zrujnovano-vnaslidok-vijny>

278. Medical Reform: The View of Public Organizations <https://health-ua.com/article/41112-meditsinskaya-reforma-vzglyad-obshestvennyh-organizatsij>

279. Government presented a draft Health Care Recovery Plan. Access [here](#).

280. Res. of the Cabinet of Ministers of Ukraine as of December 22, 2023, No. 1394 "Some issues of the implementation of the program of state guarantees of medical care for the population in 2024"

281. Support and treatment of adults and children with mental disorders at the primary level of medical care. Access [here](#).

282. Psychological and psychiatric care <https://dopomoga-info.org.ua/dopomoga/psychologichna-dopomoga/>

283. <https://www.kmu.gov.ua/news/moz-iak-znaity-medzaklad-iakyi-nadaie-bezoplatnu-psykholohichnu-dopomogu>



Reforming mental health approaches to strengthen human rights protections, reduce stigma, and expand community-based care. Mental Health Centers (MHCs) at the community level provide specialized multidisciplinary care for people with moderate and severe mental health conditions, ensuring access to evidence-based treatment and psychosocial support, while mandatory mhGAP²⁸⁴ training in primary healthcare enables early detection, management, and referrals. Strengthening coordination between these levels enhances continuity of care. Beyond healthcare, mental health is integrated across multiple sectors, including social services, education, veteran support, law enforcement, and others.

In response to the war, numerous psychological support services have been launched²⁸⁵. At the initiative of First Lady Olena Zelenska, a communication campaign titled the All-Ukrainian Mental Health Program was initiated^{286 287 288}. The campaign aims to promote a culture of mental health care and provide tools for individuals to manage their mental well-being. The program includes videos accompanied by sign language interpretation, though its accessibility and quality for persons with disabilities remain difficult to assess due to limited data^{289 290}. Organizations representing people with intellectual disabilities have criticized the lack of inclusion measures, such as accessible information in simple language or easy-to-read formats.

Physical Rehabilitation

The reform within rehabilitation (develop rehabilitation policy, create multi-disciplinary teams in hospitals providing rehabilitation services, etc.)²⁹¹, it reflects the state's declared readiness for change. However, these measures remain under-resourced and inconsistently implemented.

A survey of civilians with disabilities identified several additional barriers to accessing physical rehabilitation services, including:

- Insufficient qualifications of specialists (18%),
- Inadequate infrastructure, including poor road quality and lack of transport (18%),
- Security risks (18%), and
- Outdated rehabilitation methods and equipment (18%).

Validation sessions confirmed a need for facility renovations, improved service quality, and increased opportunities for accessing rehabilitation²⁹².

In response to the increased number of internally displaced persons (IDPs), MoH adopted measures to facilitate access to medical care for IDPs, including those with disabilities. These measures simplify the process of obtaining prescriptions and allow individuals to receive care regardless of their place of residence and without requiring a new declaration of doctor choice²⁹³. However, anecdotal evidence from the humanitarian response indicates a shortage of family doctors. For older persons and individuals with disabilities, the lack of trusted doctors presents an additional challenge.

284. further information: https://www.who.int/europe/news/item/30-11-2021-paving-the-way-for-quality-mental-health-care-in-ukraine?utm_source=chatgpt.com

285. Contacts of psychological support services <https://moz.gov.ua/article/news/kontakty-sluzhb-psiologichnoi-pidtrimki>

286. <https://www.howareu.com/>

287. All-Ukrainian Mental Health Program "How Are You?" <https://eduhub.in.ua/news/vseukrajinska-programa-mentalnogo-zdorov-ya-ti-yak>

288. In simple words. Psychology and Science <https://www.youtube.com/@user-prostymyslovamy>

289. 30 new communities joined the project of the Ministry of Social Policy to introduce a new service for building resilience <https://www.msp.gov.ua/news/23518.html>

290. The demand for psychological help has almost doubled in 2023 - Viktor Liashko <https://moz.gov.ua/article/news/zapit-na-psiologichnu-dopomogu-zbilshivsja-majzhe-vdvichi-v-2023-roci---viktor-liashko>

291. Law of Ukraine "On Rehabilitation in the Sphere of Health Care" <https://zakon.rada.gov.ua/laws/show/1053-20#Text>

292. *A rapid assessment of the barriers faced by explosive ordnance survivors during rehabilitation*. Authors: Nataliia Lukianova, PhD in Political Science, Nataliia Sitnikova, PhD in Economics. P. 36-37.

293. Resolution of the Cabinet of Ministers of Ukraine as of March 30, 2022, No. 390 "On Amendments to Certain Resolutions of the Cabinet of Ministers of Ukraine Regarding the Period of Re-examination of Persons with Disabilities and the Extension of the Validity of Certain Medical Documents under Martial Law"



PROVISION OF ASSISTIVE TECHNOLOGIES

The state-guaranteed list of assistive products for persons with disabilities, including children, is defined by a 2012 Cabinet of Ministers Order^{294 295}. This comprehensive list includes medical devices and other supplies that individuals with disabilities are entitled to receive free of charge^{296 297}. However, OPDs report that the provision of these products is inconsistent and often sporadic. Following the start of the full-scale invasion, medical supplies were frequently distributed by OPDs rather than through official channels. In early 2022, measures were introduced to address challenges in providing assistive products during martial law. These included:

- Providing persons with assistive technology without the need for a long wait²⁹⁸,
- Permitting early replacement of assistive devices for internally displaced persons (IDPs) who lost them due to hostilities, and
- Allowing temporary issuance of assistive devices directly at healthcare facilities, which are to be returned after use²⁹⁹.

Improvements in 2023

By the end of 2023, the procedures for obtaining assistive technologies (AT) were enhanced:

- Additional centers for issuing relevant documents were established,
- Mechanisms for monitoring the quality of prostheses were introduced, including photographic and fitting options,
- Repair costs for assistive devices, including those damaged by hostilities, were covered by the state budget, and
- Prostheses installed abroad could be serviced and repaired in Ukraine during the warranty period, with costs covered by the government.
- The list of individuals eligible for expensive rehabilitation aids, such as electric and active wheelchairs, was expanded.

However, the changes also introduced complications, particularly for persons with hearing or visual impairments seeking compensation for self-purchased assistive devices. These individuals now face additional confirmation requirements.

Despite these advancements, significant barriers remain in the provision of assistive technologies:

- A lack of funding for necessary products, including innovative technologies.
- Poor-quality products and a lack of individualized approaches (e.g., offering baby diapers to children with disabilities) undermine effectiveness.
- Devices provided often fall short of the legal amount or are accompanied by inadequate compensation for self-purchased AT.

294. Res. of the Cabinet of Ministers of Ukraine No. 1686 of December 8, 2006 "On Approval of State Standard Program for the Reh. of Persons with Disabilities"

295. Res. of the Cabinet of Ministers of Ukraine No. 757 of May 23, 2007 "On Approval of the Reg. on Individual Program of Reh. of a Person with Disabilities"

296. Resolution of the Cabinet of Ministers of Ukraine No. 1301 of December 3, 2009 "On Approval of the Procedure for Providing Persons with Disabilities, Children with Disabilities, and Other Certain Categories of the Population with Medical Devices and Other Means"

297. NAPD: Analytical Report on Rehabilitation Services for Adults and Children with Disabilities. Access [here](#).

298. Res. of the Cabinet of Ministers of Ukraine as of December 16, 2022, No. 1462 "Some issues of the organization of rehabilitation in the field of health care"

299. NAPD: Analytical Report on Rehabilitation Services for Adults and Children with Disabilities.



- Delays are common in inpatient settings for medical devices and other supplies.
- Persons with disabilities report a lack of accessible information about available assistive devices and how to obtain them.
- Complex procedures, particularly for IDPs who relocate before registering, and lack of, or inaccessibility to an outpatient clinic³⁰⁰

The current policy providing AT remains complicated, leading to unclear procedures and varying levels of access to AT. According to a survey, 23% of civilians with disabilities highlighted the lack of information about state-funded assistive devices, while another 23% reported challenges related to the extensive documentation required to obtain them³⁰¹.

EDUCATION

In 2017, Ukraine enacted legislation mandating educational institutions to establish inclusive groups or classes upon the request of students³⁰² with specific educational needs – children or persons a person who needs additional permanent or temporary support in the educational process in order to ensure their right to education (including children with disabilities or from minority communities, as per Ukrainian definition) or their parents. By January 1, 2020, 25,338 children with special education needs³⁰³ were receiving inclusive education. There is no information of the number of children with disabilities in this group.³⁰⁴ During the 2019–2020 academic year, 35% of secondary education institutions organized inclusive education³⁰⁵. Progress before the war included the establishment of a network of inclusive resource centers (IRCs), provision of subsidies for creating inclusive educational environments where children with and without disabilities learn side-by-side, and the introduction of assistant teacher positions, based on individual needs in classes.

Impact of the War

The war has severely impacted Ukraine's education system, with thousands of educational institutions being destroyed or damaged. Over time, many students transitioned to distance learning or attended classes in shelters set up for offline learning³⁰⁶. According to the Education Cluster, disability remains the most significant barrier to accessing education, although data from the Ministry of Education (MoE) in 2023³⁰⁷ shows an increase in students with specific educational needs (enrollment and reporting), as well as a rise in the number of inclusive classes and assistant teachers. However, OPDs have noted the difficulty in obtaining comprehensive data on the total number of school-age children with disabilities and those enrolled in special education³⁰⁸. This data gap prevents a clear understanding of whether the increase in inclusive education corresponds to a decrease in the number of children in special institutions or a general rise in school-age children with disabilities. As of September 1, 2016, 18,054

300. Analytical report on rehabilitation services for adults and children with disabilities: Oksana Polyakova, Svitlana Petrusha, Larysa Baida.

301. A rapid assessment of the barriers faced by explosive ordnance survivors during rehabilitation. Authors: Nataliia Lukianova, PhD in Political Science, Nataliia Sitnikova, PhD in Economics. P. 36-37.

302. As stated under the Law of Ukraine "On Education" Art. 20 "2. If a person with special educational needs or his/her parents apply, the educational institution shall form an inclusive class and/or group on a mandatory basis"

303. Definition as per Ukrainian law including children with disabilities, Roma minorities, etc.

304. The State-Party Report. Para. 229. 1.13 - 497 inclusive classes were created at 5.331 general secondary education institutions, in which 18.643 children with special educational needs are enrolled in 2019-2020 academic year (36.5% more than in 2018-2019 academic year).

305. Fight For Right. // <https://ffr.org.ua/wp-content/uploads/2022/10/CRPDalternative.pdf>, inclusive education indicates: budget for creating an accessible environment, and admitting students with disabilities into secondary education. There is a lack of data about how many barriers have been tackled to increase overall access to education.

306. Ukrainian education without barriers - MES is working on a national strategy for the development of inclusive education <https://mon.gov.ua/ua/news/ukrayinska-osvita-bez-baryeriv-mon-pracyuye-nad-rozroblenniam-nacionalnoyi-strategiyi-rozvitku-inklyuzivnogo-navchannya>

307. Statistics <https://mon.gov.ua/osvita-2/inklyuzivne-navchannya/statistichni-dani>

308. The GoU adopted a new strategy to enhance inclusive education: At 7th June 2024 the Government adopted the National strategy for the development of inclusive education for the period up to 2029 and approval of the operational plan for its implementation for 2024-2026. <https://zakon.rada.gov.ua/laws/show/527-2024-%D1%80#Text>



children with disabilities were in institutional care facilities, per the National Strategy for Reforming the System of Institutional Care and Education (2017–2026)³⁰⁹. The Draft Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment (2024–2028) reports 5,003 children with disabilities 2024 in institutional care³¹⁰, with:

- 3,433 in educational institutions,
- 469 in healthcare institutions,
- 1,085 in social protection institutions, and
- 16 in private institutions.

Some children with disabilities have left Ukraine due to the war, and others in institutional care facilities operating remotely or returning home daily are likely not included in these counts. To support children with disabilities, the MoE has implemented several measures:

- Printing textbooks in Braille for grades 5, 6, and 10,
- Providing specially equipped buses for transportation to educational institutions, and
- Expanding the “School of Superheroes” educational centers, which cater to students undergoing long-term medical treatment. By 2024, 11 centers were operating, with plans for six additional centers.

As of 2023, Ukraine had 690 inclusive resource centers, with 664 remaining operational during the war. The MoE plans to expand IRC functions, strengthen interactions with preschool and general secondary institutions, and restore damaged or destroyed centers. Despite these efforts, significant barriers to education for children with disabilities remain:

- Insufficient funding for repairs or purchasing new aids,
- Limitations of online learning, which often lack individualized approaches and effective inclusion,
- Few programs offering psychological support for children with special educational needs³¹¹, and
- Stigma among professionals regarding education for children with disabilities.

Validation sessions highlighted the limited scope of inclusive education, often reduced to placing a child with disabilities in a mainstream class without adequate support, for example reasonable accommodation. Challenges extend across the education continuum, from preschool and kindergarten to higher education and vocational training. Additionally, children in social, medical, and institutional care facilities often lack access to age-appropriate education. The education system also suffers from a shortage of trained staff, lack of suitable materials, including assistive technology, and Insufficient provisions for reasonable accommodations.

EMPLOYMENT

Ukraine’s legislation on labor and employment for persons with disabilities includes several key principles:

- A 4% employment quota for people with disabilities within private and public sector,
- Equal treatment of persons with disabilities in the labor market, regardless of their disability group, and
- Financial sanctions for organizations failing to meet the employment quota.

309. <https://zakon.rada.gov.ua/laws/show/526-2017-%D1%80#n23>

310. The Draft Order of the Cabinet of Ministers of Ukraine on Approval of the Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment for 2024-2028 has been published for public discussion on the website of the Ministry of Social Policy. <https://www.msp.gov.ua/projects/892/>

311. <https://nus.org.ua/articles/shho-z-inklyuzyvnoyu-osvitoju-v-ukrayini-pid-chas-vijny/>



However, implementation of these principles faces numerous challenges in practice:

- Insufficient state support for employment in the public sector and for self-employed persons with disabilities,
- Absence of guarantees for reasonable accommodation³¹², and
- Lack of mechanisms for integrating people with intellectual disabilities into the open labor market.

Employment Practices

There are significant shortcomings in reporting and enforcing state standards for inclusive employment. While state standards for inclusive employment in social services were introduced in 2017, their application remains inconsistent³¹³, and progress is difficult to measure. For example, in 2015, reasonable accommodation for civil service roles was approved, but a methodology for its implementation was not introduced until six years later, and regulations for barrier-free workplaces were only approved in 2023^{314 315}. Additionally, public data indicates that the state is currently not adhering to these regulations. For example, as of 2017, only 3 out of 17 ministries have fulfilled the standard for employing persons with disabilities³¹⁶.

As of 2023, only 14.32% of the public sector adhered to the employment quota, slightly increasing from 13.8% in 2022³¹⁷. This is in stark contrast to higher compliance rates in the private sector (73,69% 2022 and 78,68% 2023), where penalties are more strictly enforced³¹⁸. Despite regulations, public institutions often do not pay fines for failing to meet quotas, hindering accountability. A lack of comprehensive data collection further exacerbates these issues, as there is no reliable comparison between the total number of employees with disabilities and the broader population of persons with disabilities^{319 320}. Studies looking into changes in the labor market are limited, with currently only two studies, (REACH, LoTS) have been conducted around inclusion and livelihood in the humanitarian sphere. These studies aim to increase available data around inclusive employment, the economic situation of persons with disabilities and potential identified solutions.

Legislative Developments

Approval of Draft Law 5344³²¹, which outlines the government's vision for employment of persons with disabilities, remains pending after three years. While the draft proposes fundamental changes, including incentive mechanisms for employers and an equitable approach to accommodating different types of disabilities, it has received mixed feedback. Supporters emphasize the law's potential for improving

312. Alternative report on Ukraine's implementation of the Convention on the Rights of Persons with Disabilities. [Report of non-governmental organizations on the implementation of the Convention on the Rights of Persons with Disabilities 2015-2020 by Ukraine](#)

313. Order of the Ministry of Social Policy of Ukraine dated 21.09.2016 No. 1044 "On Approval of the State Standard of Social Services of Social Support in Employment and in the Workplace" // <https://zakon.rada.gov.ua/laws/show/z1359-16>

314. [Order of the National Agency for Civil Service of March 31, 2023 No. 51-23 "On Approval of Methodological Recommendations on the Formation of a Barrier-Free Workplace in State Bodies"](#)

315. Order of the National Agency for Civil Service of April 4, 2023 No. 53-23 "On Approval of Methodological Recommendations on the Formation of a Barrier-Free Environment in the Workplace in Local Self-Government Bodies"

316. Ministries ignore the quota for the employment of persons with disabilities – [research](#)

317. Information on the fulfillment by employers of the standard of workplaces intended for the employment of persons with disabilities, in accordance with Art. 19 of the Law of Ukraine "On the Fundamentals of Social Protection of Persons with Disabilities in Ukraine" (as amended) (as of 15.03.2024)

318. Alternative report on Ukraine's implementation of the Convention on the Rights of Persons with Disabilities. Report of non-governmental organizations on the implementation of the Convention on the Rights of Persons with Disabilities 2015-2020 by Ukraine

319. 2016 – 381.883 of working people with disabilities, 2017 – 390.012, 2018 – 405.153, 2019 – 417.897, 2020 – 412.089. // Information on the fulfillment by employers of the standard of workplaces intended for the employment of persons with disabilities, in accordance with Art. 19 of the Law of Ukraine "On the Fundamentals of Social Protection of Persons with Disabilities in Ukraine" (as of 31.12.2022)

320. There are 3 million people with disabilities in Ukraine // <https://minre.gov.ua/2023/09/22/v-ukrayini-nalichuyetsya-3-milijony-lyudej-z-invalidnistyu/>

321. Draft Law No. 5344 of 07.04.2021 "On Amendments to Certain Laws of Ukraine on the Creation of Favorable Conditions for the Employment of Persons with Disabilities" // <https://itd.rada.gov.ua/billInfo/Bills/Card/26215>



inclusive employment practices³²², while OPDs have raised concerns about the law's non-compliance with international employment standards, particularly regarding reasonable accommodation³²³.

A recent initiative compensates employers for arranging workplaces for persons with disabilities. Compensation is provided for actual costs, capped at 15 minimum wages for Group I disabilities and 10 minimum wages for Group II disabilities³²⁴. While some employers have successfully received this compensation³²⁵, its timeliness and overall effectiveness require further monitoring.

Impact of the War

The full-scale invasion has disproportionately affected persons with disabilities in the labor market:

- Many people with disabilities live below the poverty line, receiving monthly government benefits of approximately \$60^{326 327}.
- Destruction of transport and civilian infrastructure^{328 329}, combined with widespread displacement and migration, has caused significant job losses.
- For internally displaced persons (IDPs), finding new employment is particularly challenging.

The employment rate among persons with disabilities remains lower than the general population. While the number of job offers returned to pre-war levels in early 2024^{330 331}, these vacancies rarely include measures to create accessible work environments.

Inclusive Livelihood Initiatives

Emergency livelihood programs were integrated into the Food Security Cluster in 2023, with a primary focus on agricultural activities in rural areas. A new study by LoTs aims to inform a livelihood strategy at the cluster level, focusing on inclusive employment and identifying solutions for the economic challenges faced by persons with disabilities. Upskilling and career change opportunities are critical to addressing the challenges posed by the war, including the rising number of individuals with disabilities due to war-related injuries. As inclusive employment practices are still limited, the development of timely, efficient processes remains essential to ensure sustainable livelihoods for persons with disabilities.

JUSTICE

Access to justice for people with disabilities in Ukraine faces significant systemic barriers, particularly for those deprived of legal capacity. Despite some improvements, including the removal of certain restrictions on access to legal aid, major challenges persist. One significant issue is the lack of individual assessments, as data for incapacitated and partially incapacitated persons is merged, making it difficult

322. The Ministry of Social Policy supports the adoption of [draft law 5344-d](#), which expands the rights of persons with disabilities to employment

323. [Non-compliance of Draft Law No. 5344-D with International Standards: We Demand Appropriate Mechanisms to Protect Against Discrimination and Fulfill the Obligation to Ensure Reasonable Accommodation](#)

324. [Compensation for the arrangement of a workplace for a person with a disability](#)

325. Already 200 employers have received compensation for the employment of persons with disabilities. Information [here](#).

326. What will be the disability pension 2024: Ukraine has increased the amount of social benefits. Access [here](#).

327. The amount of state social benefits in 2024 http://yu.mk.ua/news/show/rozmiri_derzhavnikh_sotsialnikh_dopomog_v_2024_rotsi?

328. Russia shells civilian objects in Ukraine an average of 75 times a day: T4P study <https://t4pua.org/1769>

329. The Chairman of the Council of Judges talks about the work of courts during the war, the competition to the HCJ, war crimes cases, and judges at the front <https://suspiilne.media/466199-golova-radi-suddiv-pro-robotu-sudiv-pid-cas-vijni-konkurs-do-vkks-spravi-sodo-voennih-zlociniv-ta-suddiv-na-fronti/>

330. Labor market: what specialists are they looking for and where they offer the highest salaries. Article [here](#).

331. Employment of persons with disabilities, a practical guide. P. 9. Article [here](#).



to evaluate individual circumstances accurately^{332 333}. Court practices also fail to uphold the rights of these individuals, with nearly 80% of applications for the restoration of legal capacity being denied. Decisions are frequently made in the absence of the affected individual, and procedural violations often result in unfair outcomes.

Ukrainian legislation does not adequately protect individuals deprived of legal capacity³³⁴, especially in cases that predate 2017, which are rarely reviewed. Furthermore, court hearings often proceed without the personal presence of individuals whose legal capacity is being debated³³⁵, and they are rarely provided with a personal assistant. Instead, family members, upon whom these individuals are entirely dependent, typically provide support during legal proceedings. Courts also rely heavily on forensic psychiatric evaluations, which lack transparency and standardization. Between 2020 and 2021, only 22% of the 283 court cases seeking restoration of legal capacity were successful, and these approvals were largely based on claims of improved conditions by relatives or institutional administrators. However, even in these cases, adverse forensic psychiatric examination results often led to dismissals³³⁶.

Barriers for people with disabilities in institutional care settings further compound the issue. Human rights organizations have documented cases where lawyers providing free secondary legal aid neglected their duties, such as failing to visit clients in residential institutions before proceedings³³⁷. In some instances, individuals requesting legal assistance faced opposition from guardians or institutional administrators, with reports of individuals being confined in isolation wards to prevent their participation in court hearings³³⁸.

The ongoing war has further disrupted the justice system, with around 14% of courts rendered non-operational due to hostilities. Courts in Crimea and occupied territories of Donetsk and Luhansk oblasts have been inactive since 2014. Many surviving court buildings have been destroyed or looted³³⁹, while air alerts and power outages frequently interrupt court operations^{340 341}.

Efforts to Enhance Accessibility

Ukraine has made strides in digitizing its justice system through initiatives such as the Electronic Court system, Electronic Cabinet, and the e-Court mobile application. However, web accessibility remains limited^{342 343}, with evaluations indicating basic accessibility ratings between 4 and 8 out of 10³⁴⁴. Efforts to improve access to free legal aid include raising the financial threshold for legal aid³⁴⁵, engaging sign language interpreters during secondary legal aid (representation in court, provision of a lawyer) stages,

332. Report of the courts of first instance on the consideration of cases in civil proceedings https://court.gov.ua/userfiles/media/new_folder_for_uploads/main_site/1-c%20-%204-%202022.xls

333. No. 1-ц Report of the Courts of First Instance on the Consideration of Cases in Civil Proceedings https://court.gov.ua/userfiles/media/new_folder_for_uploads/main_site/1-ts_4-2023.xls

334. UN Human Rights Monitoring Mission in Ukraine 'Briefing note 'Situation of human rights of persons with intellectual and psychosocial disabilities in Ukraine'

335. Ibid.

336. Ibid.

337. Ibid.

338. Put in a 'punishment cell' for no reason: UHHRU lawyers win case in the ECtHR // <https://www.helsinki.org.ua/articles/bez-prychyny-pomistyly-v-kartser-iurysty-uhsp-vyhraly-spravu-v-yespl/>

339. (Information as of May 2023) // <https://rsu.gov.ua/ua/news/golova-radi-suddiv-ukraini-pro-robotu-sudiv-pid-cas-vijni-konkurs-do-vkks-spravi-sodo-voennih-zlociniv-ta-suddiv-na-fronti>

340. Litigation during air raid alert // <https://pravokator.club/news/rozglyad-sudovih-sprav-pid-chas-povitryanoyi-tryvogy/>

341. Power outages, lack of water - consequences of another Russian missile attack on Ukraine // <https://court.gov.ua/press/general/1350136/>

342. Implementation of the Action Plan for the implementation of the National Human Rights Strategy for the second half of 2023 // _____

343. Implementation of the Action Plan for the implementation of the National Human Rights Strategy for the second half of 2023

344. Web accessibility of government websites. Report on the monitoring results [here](#)

345. Offering lawyers for people paid by the government



and offering electronic applications and counseling services via phone, messaging apps, and home visits³⁴⁶. Despite these advancements, numerous obstacles remain:

- Discriminatory norms limit legal aid access for individuals deprived of or with restricted legal capacity, offering assistance only on specific issues.
- Sign language interpretation is only available at the secondary legal aid stage.
- Legal aid quality standards lack provisions for supporting individuals with intellectual or mental health disabilities.
- Evaluation forms for legal aid services do not assess accessibility for persons with disabilities³⁴⁷.
- There is no public data on the accessibility of legal aid centers or services for people with disabilities, and accessibility improvements focus solely on isolated elements (e.g., ramps, Braille materials).
- Fear among legal professionals of “doing or asking something wrong” deters effective support³⁴⁸.
- Courts refuse to postpone hearings to accommodate rehabilitation needs³⁴⁹.
- There is a lack of mobile legal consultations in institutional settings or analysis of the representation of persons deprived of legal capacity in court³⁵⁰.
- Lack of publicly available data on accessibility in legal aid centers, coupled with a limited application of comprehensive accessibility standards, often results in a narrow focus on individual elements such as ramps, call buttons, and Braille materials³⁵¹.

7. CRPD-Compliant Budgeting

Support for people with disabilities in Ukraine is implemented through various budget programs funded by multiple ministries. The annual State Budget Law contains provisions specifically aimed at enhancing the rights and well-being of persons with disabilities. For example, Article 27 of the 2024 State Budget allocates funds from the special state budget for the "Development of Sports among Persons with Disabilities and Their Physical Culture and Sports Rehabilitation" program. Additionally, Article 9 guarantees that the subsistence minimum for persons with disabilities (2,361UAH) is set at 100% of the minimum standard for key social and demographic groups³⁵².

Budget Allocation Summary

Publicly available data for 2021 through 2024 reveals key trends in budget allocations for disability-related programs and UNCRPD implementation (detailed in Annex 7). Between 2022 and 2024, funding for programs benefiting persons with disabilities has significantly increased. Notably, the Social Protection Fund has doubled, and funding for rehabilitation and veterans' services has grown more than fivefold.

346. FFR (“024): “Assessment of barriers and needs for legal services for girls and women with disabilities.

347. Ibid.

348. FFR (2024): Assessment of barriers and needs for legal services for girls and women with disabilities.

349. survey conducted by FFR in early July 2024. A total of 45 people took part in the survey - 39 people with disabilities, 7 mothers of children with disabilities.

350. Analytical report on the results of the study “Assessment of barriers and needs for legal services for girls and women with disabilities”

351. Implementation of the Action Plan for the implementation of the National Human Rights Strategy for the second half of 2023 // _____

352. ‘On State Social Assistance to Low-Income Families’



Ministry/Funding scheme	2021 ^{353 354} in UAH	2022 in UAH	2023 in UAH	2024 in UAH
MoSP total	22.4 billion	23.6 billion	28.0 billion	34.2 billion
Payments of benefits out of MoSP total	20.2 billion	21.5 billion	24.2 billion	27.3 billion
Social protection schemes (Total fund for social protection of persons with disabilities)	2.2 billion (2.3 billion)		3.8 billion ³⁵⁵	6.9 billion
Provision of technical and other rehabilitation/access to AD	1.5 billion	1.55 billion ³⁵⁶	3.1 billion ³⁵⁷	5.3 billion
Ministry of Veteran Affairs	1.1 billion	1.3 billion	5.9 billion	6.3 billion
Ministry of Youth and Sports	1.5 billion	1.8 billion	0.7 billion	2,1 billion
State Committee for Television and Radio Broadcasting	1.8 million	1.3 million	3.4 million	3.4 million
Ministry of Health	No public data	No public data	No public data	No public data
Ministry of Education	No public data	No public data	No public data	No public data

Education and Health Budgets

In 2021, UAH 100.1 billion was allocated as an educational subvention from the state budget to local budgets. This funding supported salaries for teachers in institutional care facilities like orphanages, inclusive resource centers, and special schools. Additionally, UAH 504.5 million was designated to support children with special educational needs (see Section 6), such as those with visual impairments, deaf and hard of hearing, severe speech disorders, intellectual disabilities, complex developmental disorders and musculoskeletal disorders.

However, no disaggregated data is available for health care expenditures for persons with disabilities, as the Medical Guarantees Program applies to all citizens. This lack of specificity makes it impossible to compare expenditures on health and education before and after the full-scale invasion. As for regional budgets, an analysis of expenditures from 13 regional budgets and Kyiv's budget in 2021 revealed that only 0.9% of total regional expenditures were allocated to social protection for persons with disabilities, amounting to UAH 1.4 billion. These funds were primarily used for:

- Social services, including inpatient care for children with disabilities,
- Rehabilitation services for children and adults with disabilities,
- Burial costs for combatants and persons with war-related disabilities,
- Maintenance of sports and rehabilitation centers, and
- Financial support for veteran and disability-focused public associations³⁵⁸.

353. Data for 2021 – according to reports on the budget programs for 2021. MoSP <https://www.msp.gov.ua/news/22019.html?PrintVersion>

354. MoSP in 2022 <https://www.msp.gov.ua/news/21327.html?PrintVersion>, 2023 <https://www.msp.gov.ua/news/22632.html?PrintVersion>, 2024 <https://www.msp.gov.ua/news/23452.html>

355. Zholnovych: The task is to ensure economic independence of people with disabilities <https://www.ukrinform.ua/rubric-society/3780599-zolnovic-zavdanna-zabezpechiti-ekonomichnu-samostijnist-ludej-z-invalidnistu.html>

356. Data for 2022 – according to reports on the implementation of passports of budget programs for 2022.

357. <https://www.kmu.gov.ua/news/kolonka-zastupnyka-ministra-finansiv-romana-iermolychева-dlia-the-page-07022024>

358. The regional budget of the Zhytomyr region _____



In 2023 and 2024, the educational subvention from the state to local budgets amounted to UAH 90.7 billion and UAH 103.2 billion, respectively. Additionally, UAH 304.6 million annually was allocated for state support to persons with special educational needs (of which persons with disabilities are only a part). No specific data on healthcare expenditures for persons with disabilities is publicly available.

Ministry of Social Policy

The Ministry of Social Policy (MoSP) plays a critical role in disability-related funding. Its budgetary allocations rose from UAH 23.6 billion in 2022 to UAH 34.2 billion in 2024³⁵⁹. The ministry's expenditures on social protection of persons with disabilities have shifted from the 'general social protection' budget line to a more rights-based formulation called 'integration into active life through assistive devices and social services'³⁶⁰.

Despite increased funding and a more rights-based language, it can still be seen that the expenditures are benefit related instead of focusing on individual needs and supporting service. For example, most of these expenditures continue to support social payments related to disability, benefits (91% in 2023 and 87% in 2024)³⁶¹. Pensions for persons with disabilities³⁶² fall under the Pension Fund of Ukraine, making it difficult to disaggregate these costs. MoSP's budget for assistive devices and prosthetics increased from UAH 1.55 billion in 2022³⁶³ to UAH 5.3 billion in 2024, a nearly fourfold increase. The allocated funds for 2024 are expected to cover the prosthetic needs of 2,300 wounded servicemen³⁶⁴.

Assistive devices and reimbursement	Budget provision 2024 ³⁶⁵
Ensure access to AD: <ul style="list-style-type: none">• for children with disabilities and other specific categories of the population• prosthetics and orthotics with products of increased functionality using the latest technologies and manufacturing technologies that are not available in Ukraine	UAH 5.3 billion (2023: UAH 3.1 billion)
Provided for reimbursement of the cost of rehabilitation services for children with disabilities	UAH 1 billion (2023: UAH 182.7 million)

359. Zholnovych: [The task is to ensure economic independence of people with disabilities](#)

360. Passports of budget programmes for 2021, 2022, 2023.

361. State social assistance to persons with disabilities from childhood and children with disabilities; monthly financial assistance to a person who lives with a person with a disability of group I or II due to a mental disorder, who, according to the conclusion of the medical commission of a medical institution, needs constant outside care, for the care of him/her; state social assistance to persons who do not have the right to a pension and persons with disabilities; monthly compensation payment to an unemployed able-bodied person who cares for a person with a disability of group I, as well as for a person who has reached the age of 80; one-time cash payment to persons with disabilities as a result of the war on the Independence Day of Ukraine; insurance payment to medical workers in case of disability and degree of disability within one year from the date of acute respiratory disease COVID-19 caused by coronavirus SARS-CoV-2, which occurred during the performance of professional duties in conditions of increased risk of infection

362. Pension for person with disabilities: pensions are for people with disabilities 65+, for people with disabilities who stopped working as well as for people with disabilities employed. The pension is additional payment scheme for people with disabilities outside of social payments under the MoSP.

363. Data for 2022 – according to reports on the implementation of passports of budget programs for 2022.

364. <https://www.kmu.gov.ua/news/kolonka-zastupnyka-ministra-finansiv-romana-iermolycheva-dlia-the-page-07022024>

365. <https://www.kmu.gov.ua/news/kolonka-zastupnyka-ministra-finansiv-romana-iermolycheva-dlia-the-page-07022024>



The Medical Guarantee Program (MGP) has also expanded to include new rehabilitation packages bringing the total to 44 service packages³⁶⁶ for inpatient and outpatient care³⁶⁷. However, inefficiencies persist, as highlighted by an audit from the Accounting Chamber of Ukraine, which found:

- UAH 22.9 million in inefficient spending on rehabilitation equipment.
- Violations totaling UAH 65 million, delaying service delivery and revealing contradictions in regulatory frameworks.
- Ongoing challenges with hiring qualified personnel to operate prosthetics facilities and provide quality services³⁶⁸.

Ministry of Veterans Affairs

The Ministry of Veterans Affairs has seen a dramatic increase in funding, from UAH 1.1 billion in 2021 to UAH 6.0 billion in 2024. A new initiative introduced in 2023 provides one-time financial assistance to individuals disabled due to war injuries, with UAH 231.9 million allocated in 2023 and UAH 294.0 million in 2024 under the Law on the Status of War Veterans and Their Social Protection³⁶⁹.

International Support

Humanitarian aid has played a crucial role since the full-scale invasion. In 2022, about 16 million people received humanitarian aid³⁷⁰, while in 2023, this figure dropped to 11 million³⁷¹ including 10-15% persons with disabilities. This number is expected to drop further in 2024, with an expected 8.5 million people expected to receive aid³⁷², with 13% (1.1 million) being persons with disabilities.

Financial Assistance Programs for Vulnerable Families and Persons with Disabilities

The Ministry of Social Policy (MoSP), in collaboration with the United Nations Children's Fund (UNICEF), launched a joint project to provide targeted financial assistance to low-income families with children³⁷³. This initiative specifically supports families that include a child with a disability under the age of 18 or large low-income families with children under 18 who do not receive financial support from other international organizations. Under this program, families receive financial assistance for three months, with UAH 3,600 per month allocated for each recipient of state social assistance and an additional UAH 6,660 per child. The project has a planned budget of UAH 333 million and is expected to benefit approximately 5,000 families.

In February 2024, the UN World Food Program (WFP) expanded its supplementary cash assistance program to further address the needs of vulnerable populations, including persons with disabilities. Developed in coordination with the Ministry of Social Policy, the program aims to provide financial assistance to more than 310,000 people, particularly those receiving state social assistance for disabilities incurred during childhood or for children with disabilities. Eligible individuals are those whose

366. <https://www.kmu.gov.ua/news/z-1-sichnia-pochynaie-diiaty-prohrama-medychnykh-harantii-na-2024-rik>

367. <https://moz.gov.ua/article/news/medichni-poslugi-z-reabilitacii-ukrainciv-e-bezoplatnimi>

368. <https://naiu.org.ua/protezuвання-ta-reabilitatsiya-vikonannya-audytorskyh-rekomendatsij-rahunkovoyi-palaty/>

369. The law: "On the Status of War Veterans, Guarantees of Their Social Protection" and one-time payment UAH 231.9 million in 2023 and UAH 294.0 million in 2024.

370. Humanitarian Response Plan. Ukraine (Cycle of Humanitarian Programs 2023). February 2023

371. Ukraine: Humanitarian Response and Funding Snapshot (January - December 2023) <https://reliefweb.int/report/ukraine/ukraine-humanitarian-response-and-funding-snapshot-january-december-2023-enuk>

372. Humanitarian Needs and Response Plan. Ukraine 2024; December 2023

373. More than 20,000 Ukrainians received financial assistance within the framework of a joint project of the Ministry of Social Policy and the United Nations Children's Fund (UNICEF), reported [here](#)



social assistance amounts are below UAH 3,250 per month³⁷⁴. The WFP has committed approximately UAH 800 million to this initiative. Since its launch in August 2023, the program has reached around 400,000 pensioners³⁷⁵, emphasizing its broad impact on vulnerable groups. The initiative is primarily funded by Germany, the European Union, and Sweden, with additional contributions from other donors³⁷⁶.

Challenges and Gaps

Despite increased funding, several critical gaps persist:

1. Deinstitutionalization Goals

Regional budgets fail to align with the national goals of deinstitutionalization. The action plans of the Barrier-Free Strategy are financed through state and local (Hromada) government commitments, but there is no mandatory obligation for local governments to allocate funds specifically toward these objectives. Theoretically institutional care budgets are funded by the oblast budget, while social services at community level are funded at the Hromada level. According to FFR research, the Hromada don't have enough interest to enhance Deinstitutionalization due to financial concerns.

2. Data Collection and Monitoring

There is no system in place to track disaggregated data on health care expenditures for persons with disabilities. Progress is difficult to measure due to inadequate monitoring mechanisms, as budget figures typically only quantify the number of people receiving services rather than assessing whether these meet actual needs.

3. Qualitative Insights

The absence of qualitative data, such as feedback on the effectiveness of services or facilities provided, prevents a comprehensive evaluation of how budget allocations contribute to improving the lives of persons with disabilities.

8. Accountability and monitoring

The CRPD highlights key accountability and monitoring mechanisms to ensure the protection of the rights of persons with disabilities as well as monitoring, assessing and reporting on its implementation effectively. According to CRPD committee recommendations Ukraine has not yet established an independent monitoring mechanisms this nor is the Ombudsman obtaining this role to ensure Art. 33 CRPD. Organizations of Persons with Disabilities (OPDs) report significant gaps in accountability, particularly regarding their participation in the development and monitoring of strategic decisions³⁷⁷. This highlights a gap according to Art. 4 (3) UNCPRD emphasizing the importance of consultation and participation of OPDs within decision making processes.

374. Resolution of the Cabinet of Ministers of Ukraine as of February 2, 2024 No. 110 "On the implementation of a joint project with the United Nations World Food Program on additional measures for social support for persons with disabilities from childhood and children with disabilities" <https://www.kmu.gov.ua/npas/pro-realizatsiiu-spilnoho-iz-vsesvitnoi-prodovolchoiu-a110>

375. Resolution of the Cabinet of Ministers of Ukraine as of July 28, 2023, No. 781 "On the implementation of a joint project with the United Nations World Food Program on additional measures for social support of certain categories of the population" <https://zakon.rada.gov.ua/laws/show/781-2023-%D0%BF#Text>

376. <https://www.kmu.gov.ua/news/minsotspolityky-ta-vsesvitnia-prodovolcha-prohrama-on-rozshyruut-pidtrymku-liudej-z-invalidnistiu>

377. Speech by the head of the NGO Fight For Right at the conference "People-Centred Humanitarian Response in Conflict" <https://ffr.org.ua/vklyuchennya-liudej-z-invalidnistyu-na-vsih-etapah-maye-buty-nastupnym-krokom-u-gumanitarnij-roboti-v-usomu-sviti-golova-fight-for-right-yuliya-sachuk/>



Currently, several entities monitor aspects of the CRPD's implementation, including:

- Ministry of Social Policy (MoSP)
- Ombudsman
- Barrier-Free Council
- Interagency Working Group (alongside the UN Monitoring Mission, invited by the Government of Ukraine)

Ministry of Social Policy

The MoSP is responsible for collecting data and preparing the State Report on the implementation of the CRPD. This report serves as the foundation for Ukraine's accountability on disability rights but does not encompass a broader mechanism for monitoring compliance or ensuring follow-up actions.

Ukrainian Parliament Commissioner for Human Rights (Ombudsman)

The Ombudsman serves as a National Human Rights Institution (NHRI) that adheres to the Paris Principles. Their primary role is to oversee parliamentary control over the protection of human rights and freedoms³⁷⁸. Key tasks of the ombudsman are:

- Submitting constitutional proposals to the Constitutional Court.
- Monitoring State bodies' compliance with human and civil rights.
- Conducting unannounced visits to places of detention.
- Summoning officials, Ukrainian citizens, foreigners, and stateless persons to provide oral or written explanations related to cases.
- Filing court applications to protect the rights and freedoms of individuals who are unable to do so themselves due to physical condition, age, or legal incapacity.
- Participating in court proceedings in cases initiated by their claims (applications, petitions, or motions).
- Forwarding responses on human and civil rights violations to the relevant authorities for action.

Structure of the Ombudsman's Office:

The Ombudsman operates through various representatives:

- 22 oblast representatives, including Crimea.
- Nine specialized representatives covering areas such as:
 - Social and Economic Rights
 - Rights of citizens affected by armed aggression against Ukraine
 - Information Rights
 - Human Rights in places of detention
 - Equal rights and freedoms for national minorities and individuals with political or religious beliefs
 - Children's Rights
- Six representatives in different European countries³⁷⁹.

378. Article 101 of the /Constitution of Ukraine.

379. [The list of Ombudsman's Representatives.](#)



In addition, the Ombudsman`s activities are ensured by the secretariat in Kyiv. It is important to note that disability rights are included across all areas.³⁸⁰ Ombudsman`s activities are reflected in annual and special reports, but these reports often lack comprehensive information on systemic issues and the enforcement of rights. For instance, the 2022 annual report³⁸¹ highlighted challenges faced by persons with disabilities, including accessibility of temporary housing and support for persons with disabilities during evacuation abroad. The report noted limited follow-up on accessibility monitoring, with only seven facilities improving accessibility by the end of 2022. A 2023 special report on the National Preventive Mechanism (NPM) summarized data from 2017 to 2022³⁸², reflecting visits to institutions, including psychiatric hospitals under the Ministry of Health and the MoSP. However, it failed to provide clear information on the implementation of recommendations or the restoration of violated rights. The Commissioner also prepared a special report on the rights of persons affected by the armed aggression of the Russian Federation against Ukraine³⁸³, which provided insights into the war's impact on disability rights. OPDs participate in advisory councils under the Ombudsman, addressing issues such as non-discrimination and social, economic, and cultural rights.

Barrier-Free Council

The Barrier-Free Council³⁸⁴ monitors the performance of executive authorities in creating a barrier-free space³⁸⁵. The Council reviewed the reports on action plan implementation and progress achieving the strategic goals. The Council includes representatives of OPDs and serves as a platform for addressing accessibility concerns. However, its monitoring efforts are primarily limited to ensuring compliance with assigned tasks rather than comprehensive systemic evaluation.

Interagency Working Group

The Interagency Working Group for monitoring the National Human Rights Strategy includes representatives from ministries, international organizations, and human rights associations³⁸⁶. The National Human Rights Strategy includes several tasks related to Disability Rights, mostly in accessibility – access to building, information (use of accessible formats and sign Language), access to Free Legal Aid and to justice in general, and other.

UN Monitoring Mission³⁸⁷.

At the Government of Ukraine's invitation, the UN Monitoring Mission observes the overall human rights situation, including the rights of persons with disabilities. Its reports, such as a special report on persons with intellectual and psychosocial disabilities³⁸⁸, provide valuable insights but often lack direct mechanisms for addressing identified gaps. Other UN organizations, such as UNDP, contribute to monitoring and evaluating disability rights in Ukraine. For example, UNDP published a report on

380. <https://ombudsman.gov.ua/>

381. <https://ombudsman.gov.ua/report-2022/en/>

382. Special report of the Ukrainian Parliament Commissioner for Human Rights "On the state of implementation of the national preventive mechanism in Ukraine in 2022" <https://ombudsman.gov.ua/storage/app/media/uploaded-files/spetsdopovid-npm-2022-na-druk-1compressed-1.pdf>

383. Special report of the Ukrainian Parliament Commissioner for Human Rights on the observance of the rights of persons affected by the armed aggression of the Russian Federation against Ukraine (for the period February 24 - October 31, 2022) <https://ombudsman.gov.ua/storage/app/media/%D0%94%D0%BE%D0%BE%D0%BE%D0%B2%D1%96%D0%B4%D1%96/bec87182-377e-4a49-a7c6-663b4f67ad3d.pdf>

384. Resolution of the Cabinet of Ministers of Ukraine "On the Establishment of the Barrier-Free Council" <https://zakon.rada.gov.ua/laws/show/443-2021-%D0%BF#Text>

385. Ibid.

386. The Interagency Group was established in accordance with the Resolution of the Cabinet of Ministers of Ukraine dated May 12, 2021, No. 516. // <https://zakon.rada.gov.ua/laws/show/516-2021-%D0%BF#Text>

387. UN Human Rights Monitoring Mission in Ukraine was deployed in March 2014 to monitor and publicly report on the human rights situation in the country. Every day, our human rights officers speak with victims and witnesses of human rights violations throughout the country, including in territory occupied by the Russian Federation.

388. Access here: [link](#)



the evacuation of people with disabilities³⁸⁹, highlighting challenges in ensuring equitable access to humanitarian assistance. One of the last Report “Protection of Civilians in Armed Conflict — February 2025”³⁹⁰.

QUANTITATIVE AND QUALITATIVE DATA

Ukraine formally maintains a Central Disability Data Bank (CDB) that includes information on various aspects of disability, aiming at enhancing quality data and supporting evidence-based policymaking. Currently, they cover people who are assessed and certified including AT needs, education, type of impairment, etc.³⁹¹ In some cases veterans in need of AT are included, even when not assessed or certified as per legislation.

The Ministry of Social Policy (MoSP) collaborates with the Ministry of Health, Ministry of Education and Science, Ministry of Youth and Sports, Ministry of Internal Affairs, and local state administrations to manage and operate the system³⁹². Additionally, the CDB features an electronic office designed to facilitate the application process for aids and services for people with disabilities. However, users of screen readers report that the system is inaccessible, limiting its utility for many individuals. Moreover, the CDB only accounts for adults and children with disabilities certification as per Ukrainian legislation³⁹³ and groups of people who can receive assistive products and rehabilitation services, such as veterans without formal recognized as persons with disabilities. The CDB excludes persons without certification, except veterans (see above). Participants in validation sessions noted that the database fails to effectively identify the needs of persons with disabilities or streamline their access to essential services and facilities. Public authorities have also raised concerns about corruption risks associated with the database³⁹⁴.

As of January 1, 2023, Ukraine’s State Statistics Service reported 2.72 million registered people with disabilities, including:

- 204,900 individuals with disabilities in the first group.
- 888,700 in the second group.
- 1.47 million in the third group.
- 156,000 children with disabilities³⁹⁵.

The data are disaggregated by disability group, age (adults/children), geographic location, and disease category per the International Classification of Diseases (ICD)³⁹⁶. However, OPDs suggest the actual number of people with disabilities may be significantly higher, even before the full-scale invasion. A 2020 nationwide survey by Fight for Right and the Kyiv International Institute of Sociology estimated disability prevalence at around 16.8%³⁹⁷, consistent with WHO global figures (16%). This is double the amount, compared to statistical Ukrainian data (2021: 6% people with disabilities³⁹⁸). Conflict-related data from other countries, such as Syria, suggest even higher rates (20-23%).

389. Report “Rapid Assessment of the Experience of Evacuation of People with Disabilities in Ukraine as a Result of Military Operations: Research Report. UNDP in Ukraine. 2022.” <https://www.undp.org/sites/g/files/zskgke326/files/2023-03/ReportEvacuation.pdf>

390. <https://ukraine.ohchr.org/en/Protection-of-Civilians-in-Armed-Conflict-February-2025>

391. Part one of Article 41 of the Law of Ukraine ‘On Rehabilitation of Persons with Disabilities in Ukraine’.

392. Paragraph 2 of the Introductory Part of the Resolution of the Cabinet of Ministers of Ukraine of 16 February 2011 No. 121 ‘On Approval of the Regulation on the Centralised Data Bank on Disability Issues’. <https://zakon.rada.gov.ua/laws/show/121-2011-%D0%BF#Text>

393. The CDB was established in accordance with the Resolution of the Cabinet of Ministers of Ukraine No. 121 ‘On Approval of the Regulation on the Centralised Data Bank on Disability Issues’ dated 16.02.2011 2020 Ombudsman report.

394. NACP conducts anti-corruption expertise of the Government’s draft resolution on the centralised data bank on disability issues (nazk.gov.ua)

395. https://www.ukrstat.gov.ua/druk/publicat/kat_u/2023/zb/10/zb_szn_2022.pdf

396. Ukrainian statistics: https://ukrstat.gov.ua/druk/publicat/kat_u/2021/zb/07/zb_szn_2020.pdf

397. FFR (2022) ‘The rights of people with disabilities in Ukraine’. Analytical report on the results of the all-Ukrainian survey ‘Kyiv International Institute of Sociology. <https://ffr.org.ua/wp-content/uploads/2022/10/DisabilityRightsSurveyReport.pdf>

398. https://www.sddirect.org.uk/sites/default/files/2022-07/Disability%20Inclusion%20Helpdesk%20Query%2079%20-%20Ukraine%20Invasion.pdf?utm_source=chatgpt.com



Barriers to Accurate Data

The complexity of the disability determination process³⁹⁹ and stigma associated with disability contribute to underreporting. Many individuals with psychosocial or other health issues refuse to accept formal disability status. Since the onset of the full-scale invasion, government data indicate an increase in persons with disabilities, further supported by Ministry of Health (MoH) records of first-time disability recognition⁴⁰⁰ (See [Annex 8](#)).

The lack of comprehensive, disaggregated data undermines policy planning and implementation and makes monitoring difficult. For example, while the Information and Computing Center of the MoSP publishes data⁴⁰¹ on the number of internally displaced persons (IDPs) with disabilities, general war-related data remains fragmented and incomplete. This data gap has broader consequences; for instance, Ukraine has the lowest level of participation on an equal basis with others for people with intellectual disabilities among 29 European countries⁴⁰². Nonetheless, some progress has been made to address these challenges. The National Action Plan for the Implementation of the CRPD (up to 2025) aimed to enhance disability data collection using the Washington Group Short Set of Questions and online tools. Measures were envisioned to collect detailed statistics disaggregated by age, gender, functional limitations, and urban/rural residence. However, no publicly available information indicates progress by the 2023 deadline. Additionally, international and local NGOs have taken independent steps to estimate disability prevalence. For instance, the Protection Cluster and Humanity & Inclusion prepared recommendations for disability data collection, analysis, and reporting in Ukraine⁴⁰³.

Recent surveys and reports highlight trends in disability prevalence among vulnerable groups, particularly due to the war:

- 23% of internally displaced persons (IDPs) surveyed by IOM reported at least one family member with disabilities⁴⁰⁴.
- 13% of respondents who left Ukraine also reported a family member with disabilities⁴⁰⁵.
- At least 30% of individuals with disabilities live in collective sites⁴⁰⁶
- The Multi-Sector Needs Assessment (MSNA 2023) identified that 16% of respondents are persons with disabilities.
- By 2024, 30% of households surveyed reported at least one member with or at risk of disabilities (MSNA 2024)⁴⁰⁷.

Data collection is conducted and managed by the MoSP, including various aspects of disability. However, the system is inaccessible for people using screen readers. Further, only people with officially recognized disabilities are accounted for in the data. Therefore, the diverse needs of persons with disabilities remain largely unknown, meaning that the design of inclusive services across all sectors is not yet genuinely driven by data and evidence.

Moreover, in emergency settings, data disaggregated by functional difficulty, age, sex, gender, ethnicity, urban or rural location and migrant, refugee or asylum-seeking status, which could include the use of the Washington Group short set of questions on functioning⁴⁰⁸ should be collected and analyzed

399. UN disability brief 2020

400. Data taken from the State Statistics Service's collection 'Social Protection of the Population' and data provided by the Ministry of Health at the request of FFR.

401. <https://www.ioc.gov.ua/dashboard/>

402. Inclusion Indicators 2023 Rights and inclusion of people with intellectual disabilities in 29 European countries. / Inclusion Europe. Access [here](#).

403. <https://docs.google.com/document/d/1VLgV8Rf8yQbSSdGMD-7bAyMQpj2H8Kdk/edit#heading=h.b4czy9bewhc7>

404. Ukraine Internal Displacement Report GENERAL POPULATION SURVEY, ROUND 9, 26 SEPTEMBER 2022

405. <https://data.unhcr.org/en/documents/details/94176>

406. CCCM cluster findings, not published at time of writing.

407. MSNA 2024 data: not published at time of writing.

408. See UNCRPD committee observations 2024, p. 19.



on a rolling basis. For the whole population of Ukraine, data should be disaggregated by these same characteristics using a more comprehensive set of assessment tools which align with the UNCRPD.

In summary, the accountability structure to ensure protection of rights of persons with disabilities as well as monitoring of the CRPD in Ukraine is currently fragmented and therefore, not effective. While the Ukrainian parliamentary commission for human rights plays a pivotal role in human rights monitoring, an independent system to monitor the UNCRPD is yet to be established, nor the Ombudsman's function and mandate adopted. Currently, under the Law, the ombudsman does not have a duty to monitor UNCRPD. For instance, in Article 19.1 the Ombudsman is entrusted with the function of a national preventive mechanism⁴⁰⁹. Based on the initial state party report⁴¹⁰ as well as the joint 2nd and 3rd state party Report, the UNCRPD Committee repeated the recommendation to 'Establish an independent monitoring framework, in accordance with article 33 (2) of the Convention, including, among its mechanisms, the Ombudsman' as well as ensure sufficient human, financial and technical resources⁴¹¹.

9. Cross-Cutting Issues

PARTICIPATION

Organizations of Persons with Disabilities (OPDs) are integrated into existing coordination mechanisms, advisory bodies, and working groups tasked with discussing draft laws and regulations. These processes allow OPDs to propose policy or legislative changes. However, as reported by OPDs, a significant challenge is the lack of government feedback regarding the acceptance or rejection of their proposals. For instance, the Fund for Social Protection of Persons with Disabilities engages with OPDs primarily through formalized frameworks, such as competitions for distributing funds among NGOs and CSOs. This limited interaction excludes recipients of funds and the broader community of persons with disabilities from meaningful participation in decision-making processes⁴¹². Participants in validation sessions noted that the Fund's policies lack accessible and effective communication to people with disabilities. As a result, persons with intellectual disabilities and their families have no idea about the Fund or the chance to receive assistance from it.

At the local level, civil society initiatives and OPDs report minimal involvement in decision-making processes, including those related to recovery. The participation of persons with disabilities in coordinating the response and humanitarian aid distribution remains insufficient. OPDs identified several reasons for this gap:

- Limited understanding of the importance of disability mainstreaming in public life, including emergency response and recovery processes.
- Bureaucratic barriers to including OPDs in relevant national level working groups and initiatives.
- Tokenistic consultations where persons with disabilities have little influence on final decisions.
- Lack of knowledge among OPDs about how large international organizations operate.
- Absence of mechanisms to implement General Recommendation No. 7 of the UN Committee on the Rights of Persons with Disabilities, which supports Article 4, paragraph 3, and Article 33, paragraph 3, of the CRPD. It doesn't allow the OPDs to effectively take part in the implementation and monitoring of the UNCRPD and receive enough support for improving their capacity to do this.

409. under the Optional Protocol of The Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment <https://zakon.rada.gov.ua/laws/show/776/97-%D0%B2%D1%80#n171>

410. UNCRPD Committee [Concluding Observations](#)

411. UNCRPD Committee [Concluding Observations](#) on Ukraine.

412. <https://www.ispf.gov.ua/diyalnist/monitoring-zahodiv-vgoi-perelik-profesij-utos-utog>



Despite these challenges, initiatives like the Age and Disability Technical Working Group (ADTWG) and various clusters, including protection, WASH, and shelter/Non-Food Items, have aimed to foster participation. This has included the appointment of liaison officers, regular representation in the ADTWG, and active engagement with OPDs.

INCLUSION OF MARGINALIZED GROUPS

The persistent medical approach to disability in Ukraine perpetuates stigma, reinforcing the view that disability equates to "disease." This perception marginalizes people with psychosocial and intellectual disabilities, whose needs are often overlooked compared to those with other types of disabilities. Legal and academic frameworks frequently treat these two groups as a monolithic category, contrary to the CRPD's definition. Consequently, social protection and service systems fail to address their distinct needs, leading to inadequate and often inappropriate support.

People with psychosocial, intellectual, or complex disabilities face unique challenges, including effective exclusion from the open labor market due to a lack of sustainable training programs and proper support services. Many individuals from these groups rely on family members, such as mothers, for support.

Institutionalization disproportionately affects persons with intellectual and psychosocial disabilities, many of whom lack legal capacity to make decisions about their lives and health. The exact number of such individuals in institutions remains unknown, as no systematic data collection exists on their needs for community-based services, personal assistance, or employment.

Other marginalized groups within the disability community, such as Roma, LGBTQ+ individuals, and youth with disabilities from rural areas, face compounded challenges. Data collection and analysis at the state level are insufficient, and there is limited attention from OPDs to the needs of these groups. Some progress has been made regarding gender and disability issues, largely due to the efforts of individual OPDs. Similarly, civil society organizations have worked to include internally displaced persons (IDPs) with disabilities in their programs.

The National Barrier-Free Strategy identifies marginalized groups within the disability community and outlines measures to support them. However, certain groups continue to face significant challenges:

- People with psychosocial and intellectual disabilities experience higher levels of discrimination and stigmatization. Limited resources and the absence of guaranteed minimum support make accessing essential services difficult.
- Women and girls with disabilities face multiple forms of discrimination. In the context of war, they often bear additional responsibilities, such as supporting households, organizing children's education, and caring for older family members (more details section 8).
- Persons with disabilities in rural areas struggle to access quality education, healthcare, and other services. The destruction of infrastructure during the conflict has further increased their vulnerability.
- Internally displaced persons (IDPs) with disabilities encounter barriers to housing, employment, and social services. Many must rebuild their lives entirely if their homes are destroyed or inaccessible due to hostilities or occupation.

Additionally, gaps remain in addressing intersectionality. There is little information on working with Roma individuals with disabilities, LGBTQ+ individuals, or other underrepresented groups. Pre-invasion initiatives by the public sector existed, but the lack of consistent data collection, disaggregation, and needs assessments by OPDs and local authorities has exacerbated the invisibility of these populations.



GENDER EQUALITY

Women with disabilities in Ukraine are a diverse group, differing in degree and type of impairments, place of residence (urban or rural), age, education, and family responsibilities⁴¹³. As of 2018, more than 1 million of Ukraine's 2.7 million people with disabilities were women, but only a third of them were employed. Access to healthcare remains a significant challenge—65% of women with disabilities visit a doctor less than once a year, 11% rely on self-medication, and 76% lack access to gynecological services due to facility inaccessibility⁴¹⁴. Non-governmental organizations (NGOs) have also highlighted the growing number of single mothers raising children with disabilities, which increased from 154,000 in 2015 to 160,000 in 2017⁴¹⁵.

The lack of recent, disaggregated government data on women and girls with disabilities⁴¹⁶ limits assessments of their needs in humanitarian responses. Some information is available on internally displaced women with disabilities⁴¹⁷, and through UN agencies and international actors. However, the absence of robust data affects the visibility of intersectional issues in state and local policies.

Women and girls with disabilities face compounded challenges, including gender-based violence⁴¹⁸, marginalization during wartime⁴¹⁹, and the added burden of caregiving. With schools closed during the war, women have had to care for and educate children under challenging conditions, while also ensuring their psycho-emotional stability. One assessment noted, "Women play the role of heroines, as they must protect their children first and foremost."⁴²⁰

The marginalization of women and girls with disabilities is also evident in feminist movements and governance bodies⁴²¹. OPDs report that gender equality programs at local and national levels rarely involve associations of women with disabilities. Furthermore, many projects fail to align with CRPD requirements or consider gender equality. Stigma and negative attitudes persist⁴²², affecting both healthcare and societal inclusion. For example, women with disabilities report discriminatory behavior from doctors and hospitals using inaccessible equipment, such as mammogram machines⁴²³. Nearly 70% of surveyed women with disabilities cited instances of discrimination.

Funding and involvement in the humanitarian response remain limited for organizations representing women with disabilities. Donor priorities are often set without consulting these organizations, resulting in large international entities receiving most of the funding. This leaves grassroots organizations working as sub-partners, implementing priorities they had no role in shaping⁴²⁴.

A 2023 assessment revealed that while Ukraine has made significant progress in its free legal aid system, women and girls—particularly those with disabilities—often remain excluded from these services and

413. https://ukraine.un.org/sites/default/files/2020-09/cedaw%20crpd%20ukr_compressed%20%281%29.pdf

414. Ibid.

415. Verkhovna Rada of Ukraine, Parliamentary Hearings on Preventing and Combating Discrimination against Women from Vulnerable Social Groups, 10 October 2018 http://static.rada.gov.ua/zakon/new/par_sl/sl1010118.htm.

416. Other examples: The E-Data system, maintained by the Ministry of Social Policy, only considers those who apply for certain services and payments. There is a lack of interaction and data exchange between different central authorities. In response to the appeal, the State Statistics Service replies that it does not have data on disability, and the last census was in 2000.

417. E-Data Dashboard: <https://www.ioc.gov.ua/dashboard/>

418. https://ffr.org.ua/wp-content/uploads/2023/11/invalidnist_ta_viyina-analitychnyi_zvit_zh_rezultatamy_doslidzheniya.pdf

419. UN Women (2023): Women with disabilities in Ukraine. Article [here](#).

420. FFR (2023), link [here](#)

421. <https://naiu.org.ua/wp-content/uploads/2020/09/Opytuvannya-ZHINKY-infografika.pdf>

422. The information is based on the results of a survey conducted by the Fight For Right team on 03.07.2024 as part of the preparation of a report to the UN Committee on the Rights of Persons with Disabilities.

423. The information is based on the results of a quick survey conducted by FFR in early July 2024. A total of 45 people took part in the survey - 39 people with disabilities, 7 mothers of children with disabilities.

424. UN Women (2023) Women with disabilities in Ukraine. Article [here](#).



are unaware of where to seek help⁴²⁵. Girls and women with disabilities require legal assistance for a wide range of issues, many of which have been exacerbated by the war. These include access to social benefits and services, family law disputes, inheritance cases, and issues specific to wartime, such as registering internally displaced person (IDP) status, crossing borders, establishing disability status under martial law, mobilization of family members with disabilities, and connecting disabilities to injuries sustained during the war. An assessment of temporary housing for internally displaced women and girls with disabilities⁴²⁶, as well as humanitarian services and collective sites (collective housing for IDPs) for survivors of gender-based and domestic violence, highlighted significant gaps in the consideration of intersectionality. Although people with disabilities, older individuals, and families with disabled members comprise a substantial proportion of residents in these facilities, all such institutions, including modular towns, remain largely inaccessible⁴²⁷. Crisis rooms for survivors of gender-based violence also lack accessibility for women and girls with disabilities. The national hotline La Strada has noted⁴²⁸ a rise in requests for assistance from women and girls with disabilities reporting domestic violence during the war. However, barriers to accessing services are particularly acute for women and girls with psychosocial disabilities, who face double stigma and frequent denial of services. A lack of staff knowledge and awareness, combined with bias among other residents in crisis housing, further limits their access to support. Furthermore, a lack of interaction and coordination with other service providers, particularly those offering psychiatric care, compounds the challenges faced by women and girls with disabilities⁴²⁹. Care responsibilities also disproportionately fall on women, limiting their opportunities for personal and professional development. Mothers caring for children with disabilities frequently cite a lack of support networks, educational services, and accessible infrastructure.

VETERANS WITH DISABILITIES

Since the onset of the war, the number of military personnel with disabilities has increased significantly. According to the Ministry of Social Policy, 2,041 servicemen had been registered with disabilities as of March 2023: 163 in Group 1, 820 in Group 2, and 1,058 in Group 3⁴³⁰. Veterans with disabilities face barriers similar to those experienced by civilians, including lack of trust and information about services⁴³¹, unqualified staff⁴³², inaccessible infrastructure, and stigmatization.

Veterans often encounter discrimination⁴³³, with societal perceptions⁴³⁴ ranging from fear due to PTSD to stereotyping them as burdens^{435 436 437}. Many veterans express an urgent need for psychological assistance to transition to civilian life⁴³⁸. Both male and female veterans report difficulties in accessing support for establishing their disability status, as well as during treatment, rehabilitation, and demobilization processes. Support from international organizations or the government during these processes is

425. <https://ffr.org.ua/wp-content/uploads/2024/01/Rezyume-zvitu-Otsinka-bar-yriv-OON-ZHinky.pdf>

426. <https://ffr.org.ua/wp-content/uploads/2024/02/Otsinka-inklyuzyvnogo-reaguvannya-na-nadzvychajni-sytuatsiyi.pdf>

427. Note from the disability advisor: The services assessed are services for women and girls with disabilities, while they are provided by different actors and not all are under cluster guidance. E.g. Modular housing is an agency but not a cluster response under shelter/NFI.

428. <https://www.youtube.com/watch?v=wxcObWkPM>

429. From the interview, *ibid*.

430. Lack of employment opportunities for veterans with disabilities. Access [here](#)

431. *Ibid*.

432. Research "Social Services for Veterans in Communities - Challenges and Needs"

433. Reintegration of veterans in Ukraine. National Poll [here](#)

434. The Twentieth National Survey: The Image of Veterans in Ukrainian Society. Article [here](#)

435. National Sociological Survey on the Perception of People with Disabilities in Ukraine // <https://ls.org.ua/doslidzhennya/how-ukrainians-see-disability/> For example, 52% of surveyed employers say that they are afraid of the psychological problems and behavior of veterans; 19% consider alcoholism and drug addiction to be a serious obstacle; 24% see no obstacles to the employment of veterans with disabilities; 5% believe that veterans with disabilities should receive assistance from the state so that there is no need to work from: "Protect the Defender – Is Ukraine Ready to Employ Veterans with Disabilities?"

436. National Sociological Survey on the Perception of People with Disabilities in Ukraine // <https://ls.org.ua/doslidzhennya/how-ukrainians-see-disability/>

437. Lack of employment opportunities for veterans with disabilities: Article [here](#).

438. *Ibid*.



minimal, leaving veterans to rely on relatives or friends. Family members often take extended leave or quit their jobs to provide care and support⁴³⁹. While veterans receive additional attention and support from the state and volunteer networks, this does not compensate for the systemic gaps in inclusive practices, especially regarding employment and rehabilitation.

10 Disability inclusion in broader development and development contexts

Disability Inclusion in National Development Plans

‘The goal of the Strategy is to create conditions for the comprehensive development of a person throughout life, expanding opportunities for the realization of the potential and freedom of the individual, his or her civic activity for the formation of a cohesive community of citizens capable of active creative participation in the harmonious, balanced and sustainable development of the state.’⁴⁴⁰

(Human Development Strategy 2021)

Ukraine has taken steps to incorporate disability inclusion into its national development plans. In 2019, the country committed to implementing and monitoring the Sustainable Development Goals (SDGs)⁴⁴¹, followed by the adoption of the Human Development Strategy (2021–2025). The strategy identifies key disability rights challenges, such as limited inclusivity in education, inaccessible cultural and sports facilities, and insufficient employment incentives for persons with disabilities. While the strategy addresses disability issues through separate objectives, it could benefit from a more cross-cutting, interconnected approach. For example, in healthcare, the strategy promotes evidence-based rehabilitation systems from the onset of injury or illness, improved access to technical aids, and increased funding for neonatal care and early intervention. However, these efforts lack a comprehensive analysis of interconnected needs⁴⁴². Similarly, in education, the strategy emphasizes accessibility at the preschool and general levels, but cross-cutting initiatives across all education levels remain limited. On employment, the strategy aims to expand opportunities for older people and individuals with disabilities as part of broader social integration efforts.

One notable feature of the strategy is Objective 4.7, which focuses on integrating persons with disabilities through employment support, enhanced rehabilitation services, and better access to technical aids⁴⁴³. However, these objectives are sometimes repetitive and disconnected, risking the exclusion of disability as a cross-sectoral and rights-based component. Indicators such as increasing the number of employees with disabilities and providing 100% access to technical aids align with these goals but require better **integration** across sectors⁴⁴⁴.

The government’s SDG implementation efforts, supported by UN agencies, have included the publication of data⁴⁴⁵ on accessibility⁴⁴⁶ in the Voluntary National Review (VNR) of the SDGs and the preparation of guidance materials like “Mainstreaming Disability: Sustainable Development Goals” by UNDP⁴⁴⁷.

439. [Assessment of the needs](#) for the implementation of civic and political participation of veterans with disabilities caused by war in Ukraine.

440. Ibid.

441. Support for the implementation and monitoring of the SDGs is outlined in the Decree of the President of Ukraine No. 722/2019 ‘On the Sustainable Development Goals of Ukraine for the period up to 2030’ dated 30 September 2019. // <https://www.president.gov.ua/documents/7222019-29825>

442. Ibid.

443. Ibid.

444. Ibid.

445. https://ukrstat.gov.ua/csr_prezent/2.htm

446. ‘The share of public and civil facilities, landscaping, equipped with the needs of persons with disabilities, %’ (the figure for 2020 was 20%). Access [Here](#).

447. <https://www.undp.org/uk/ukraine/publications/vrakhuvannya-pytan-invalidnosti-tsili-staloho-rozvytku>



However, VNR did not provide **detailed, disaggregated data** on persons with disabilities across the SDG indicators, making it difficult to assess their actual situation in areas like **education, employment or health**. Following the full-scale invasion, indicators were revised, and an GoU ‘inter-agency working group to implement the SDGs’⁴⁴⁸ was established to ensure continued SDG progress, with discussions on preparing another Voluntary Review in 2024 (during finalization of the report, no new review was published). The Inter-agency working group, among others, “monitors the state of implementation by executive authorities of their tasks to ensure the achievement of the SDGs”⁴⁴⁹.

In addition, disability-related issues feature in the EU’s Plan Ukraine Facility, which includes reforms necessary for accession. These reforms address labor equality directives, accessibility in transport, and media accessibility. However, challenges such as restrictions on legal capacity, lack of disaggregated data, failure to ensure the principle of reasonable accommodation in the field of labor, lack of incentives for the employment of persons with disabilities in the open labor market and barriers to public services remain prominent, as highlighted by the European Commission⁴⁵⁰. This process is coordinated by the ‘inter-agency working group of Ukrainian’s Accession to the EU’, consisting of deputy-ministers and EU embassy and is led by the Vice-Prime-Minister Ministry of Justice. Under this group, 36 working groups alongside the chapters of the negotiation’s framework were created. OPDs join the following working groups:

- Social Policy and Employment: Fight for Right, All Ukrainian OPDs “Human Rights Association of Invalids”,
- Judicial and Fundamental Rights: Fight for Right, All Ukrainian OPDs “Human Rights Association of Invalids”,
- Consumer Protection and Health: Fight for Right.

Disability Inclusion in Emergency Response

Disability inclusion in emergency response has been part of Ukraine’s legislative updates since the onset of the war in 2014. However, challenges persist, particularly in informing and supporting persons with disabilities and older people. Key gaps include:

- Communication barriers: The absence of standards for providing information about services in accessible formats.
- Evacuation planning: A lack of localized data collection on the needs of persons with disabilities, resulting in their exclusion from evacuation plans.
- Facility accessibility: Limited monitoring of civil protection facilities⁴⁵¹ and the failure to involve organizations of persons with disabilities (OPDs) in safety planning.

One positive example is Ukrzaliznytsia (organizing the public railway system) which has integrated disability inclusion into its evacuation work since the full-scale invasion, maintaining disaggregated statistics⁴⁵².

448. The official information does not conclude if OPDs have been included or not.

449. Para 4.3 Regulation of Inter-agency working group.

450. European Commission: Ukraine 2023 Report.

451. Analytical report “24.02: evacuation of people with disabilities” // <https://ffr.org.ua/wp-content/uploads/2022/10/CRPDalternativeReport.pdf>

452. <https://www.ukrinform.ua/rubric-society/3806753-ukrazaliznica-cogoric-zdijsnila-1100-evakuacijnih-rejsiv.html>; <https://ffr.org.ua/wp-content/uploads/2022/11/zvit-z-pravkamy.pdf>



Evacuation and Protection for Persons with Disabilities

Reports from the Ombudsman in 2022⁴⁵³ and subsequent evaluations of evacuations in the Kharkiv oblast in 2024⁴⁵⁴ confirm that residents of protection facilities face significant protection and security risks. Despite these challenges, the Ministry of Social Policy (MoSP), in collaboration with partners and clusters, has made efforts to mainstream disability inclusion in evacuation and protection measures, including the UNDP Guidance on Inclusive Evacuation⁴⁵⁵. Additionally, the Protection Cluster, supported by MoSP, has also issued guidance on evacuating vulnerable groups⁴⁵⁶. MoSP has identified 57 premises for relocation and outlined the necessary UN partner support, which includes relocating institutions, repairing and equipping collective sites in line with barrier-free regulations, and adhering to deinstitutionalization efforts⁴⁵⁷. However, anecdotal evidence highlights the return of institutional residents to eastern facilities due to oblast-level staffing and funding regulations, undermining relocation efforts.

While Ukraine's evacuation laws⁴⁵⁸ regulate civilian evacuations, in practice, the evacuation of persons with disabilities is primarily carried out by OPDs and volunteers. These individuals are often placed in collective sites specifically for persons with disabilities, risking further institutionalization. MoSP recently issued orders for mandatory evacuation of residents from institutional care facilities near the frontline or critical infrastructure. Yet a damaged facility in Sumy Oblast 19. September 2024⁴⁵⁹ revealed that oblast authorities lacked clear procedures for timely and safe relocation. Recommendations for improving these processes⁴⁶⁰ include providing clear and timely information on evacuation needs and safety concerns, establishing comprehensive protocols and coordination mechanisms among stakeholders, ensuring accessible vehicles, personal protective equipment (PPE), and adequate training for evacuation personnel and volunteers. Post-relocation referrals are also critical. For instance, although the Affordable Medicine Program exists, the cost of medication and treatment remains a significant barrier for persons with disabilities (as reported in MSNA 2024). To enhance disability-mainstreaming in the response, collaborative efforts that focus on cross-sectorial coordination have proven to be effective initiatives. For example, the Health and Protection Clusters collaboration implementing the 'health and protection cluster operational framework'⁴⁶¹ in Ukraine. This included cluster partner meetings—such as those on MHPSS, rehabilitation, and disability advisory—as well as trainings and the development of guidance to operationalize the framework, with disability mainstreaming as a key focus area.

A key concern is the refusal to evacuate among persons with disabilities and older individuals, often due to the lack of accessible or suitable housing⁴⁶² and limited information on where they would be relocated⁴⁶³. By July 2022, more than 4,000 older people had been placed in institutional care facilities through a simplified procedure after losing their homes, marking a significant increase in institutional placements (from 998 in 2021 to 3,585 in 2022)⁴⁶⁴.

453. Special Report of the Ukrainian Parliament Commissioner for Human Rights "On the Status of Implementation of the National Preventive Mechanism in Ukraine" for 2022 // <https://ombudsman.gov.ua/storage/app/media/uploaded-files/specialreportnpm-2.pdf>

454. Letters of the Kharkiv Regional Audit Office No. 14.01-12/1304 of 16 May 2024 and No. 14.01-12/1540 of 10 June 2024 in response to requests for public information

455. <https://www.undp.org/ukraine/publications/study-report-rapid-assessment-experience-evacuating-people-disabilities-ukraine-due-war-2022>

456. <https://reliefweb.int/report/ukraine/guidance-humanitarian-evacuations-civilians-ukraine-special-considerations-children-enuk>

457. Summary of author, WHO disability advisor, attending the meeting on 17.09.2024 at Radisson Blu, Kyiv.

458. Law of Ukraine "On the Legal Regime of Martial Law": <https://zakon.rada.gov.ua/laws/show/389-19#Text>

459. <https://112.ua/en/udar-po-pansionatu-v-sumah-minsocpolitiki-neodnorazovo-vimagalo-evakuuvati-litnih-pacientiv-40817>

460. Analytical report "24.02: evacuation of people with disabilities" <https://ffr.org.ua/wp-content/uploads/2022/11/zvit-z-pravkamy.pdf>

461. <https://globalprotectioncluster.org/publications/1270/policy-and-guidance/guidelines/health-and-protection-joint-operational-framework>

462. Based on operational data from NGO teams engaged in regular evacuations and/or documentation of war crimes in the frontline areas, FFR receives data.

463. The information is based on the results of a survey conducted by the Fight For Right team on 03.07.2024 as part of the preparation of a report to the UN Committee on the Rights of Persons with Disabilities.

464. 'I had a home': older people in Ukraine and their experiences of war, displacement and access to housing



Shelter Accessibility

Shelter conditions for persons with disabilities remain inadequate. While regulations on shelters mandated accessibility before the full-scale invasion⁴⁶⁵, enforcement was limited, and shelter conditions in 2022 were reported as catastrophic, including widespread inaccessibility. Although significant regulatory changes were introduced in August 2023⁴⁶⁶, a mechanism to monitor compliance is still lacking. Only 21.5% of surveyed persons with disabilities reported having access to an accessible shelter⁴⁶⁷, while others encountered physical barriers such as stairs-only access⁴⁶⁸. The MSNA 2024 highlights inaccessibility, distance, and lack of information as primary obstacles for persons with disabilities in accessing bomb shelters, collective sites, and modular housing. Assessments by LoTS⁴⁶⁹ and Fight for Right (FFR)⁴⁷⁰ further confirmed these barriers.

To address these issues, OPDs, disability advisors, and the CCCM Cluster have conducted joint missions and developed guidance for cluster partners, alongside the National Assembly of People with Disabilities (NAPD) shelter cluster guidance⁴⁷¹. However, a collective, coordinated approach across humanitarian responses remains lacking. Within collective sites, inaccessible environments exacerbate the vulnerabilities of residents, many of whom are older individuals or persons with disabilities. The CCCM vulnerability assessment found that these groups are disproportionately represented in collective sites compared to the general population.

Disability has become a key driver of humanitarian needs⁴⁷², with urgent requirements across livelihood, health, and protection sectors (as highlighted in MSNA 2024). Households with members with disabilities face severe challenges and multiple barriers to accessing essential services.

Lastly, there is no reliable data on persons with disabilities in territories occupied by the Russian Federation (RF)^{473 474}. The RF prohibits access to these areas by monitoring bodies and organizations, making it impossible to gather accurate information about the conditions of Ukrainian citizens with disabilities, including those in institutional settings. Some fragmented accounts come from individuals who managed to relocate to government-controlled territories⁴⁷⁵. These testimonies provide limited insight into the situation but underscore the urgent need for enhanced monitoring and advocacy mechanisms for those under occupation.

Recovery Planning

The Ukrainian government has committed to ensuring that all refurbished infrastructure meets accessibility standards by 2024⁴⁷⁶. However, concerns remain among OPDs regarding the Barrier-Free Action Plan, which was approved in April 2023 and is currently being updated for 2025–2026. OPDs

465. https://ffr.org.ua/wp-content/uploads/2022/12/Evakuatsia-liudey-z-invalidnistiu_ffr.pdf

466. Civil defence structures <https://e-construction.gov.ua/opublikovano-proekt-dbn-v22-52023-zahisni-sporudi-civilnogo-zahistu>

467. Analytical report on the results of the survey on access of persons with disabilities to various types of assistance and services at their permanent place of residence during martial law // https://naiu.org.ua/wp-content/uploads/2022/07/NAIU_AnalyticalReport2UA_v03.pdf

468. The survey, conducted at the end of July 2023 by the League of the Strong NGO, involved 101 respondents from 16 regions of Ukraine. Barrier-free and accessible during the war <http://ls.org.ua/wp-content/uploads/2023/08/rezultaty.pdf> ; FFR report: <https://ffr.org.ua/wp-content/uploads/2024/02/METODOLOGIYA-OTSINKY-ARHITEKTURNOYI-DOSTUPNOSTI-SPORUD-TSYVILNOGO-ZAHYSTU-NASELENNYA.pdf>

469. Assessment of modular housing: <https://ls.org.ua/wp-content/uploads/2023/02/analiz-modulnyh-mistechok.docx.pdf>

470. Assessment of inclusive response to emergencies. Study of accessibility of temporary accommodation for internally displaced women with disabilities

471. Access [here](#)

472. <https://reliefweb.int/report/ukraine/multi-sectoral-needs-assessment-msna-gender-age-and-disability-situation-overview-january-2024-ukraine>

473. Places of detention: number, profile and geography during the war. Report [here](#)

474. 'They were persuaded to cooperate and 'deported'. The fate of Zaporizhzhia psychoneurological boarding schools under occupation. Report [Here](#)

475. Submission of the Charitable Foundation 'Smile' to the UN Committee on the Rights of Persons with Disabilities for the 31st session. https://tbineternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2FCRDP%2FCSS%2FUkr%2F58979&Lang=en

476. Order No. 372-r of the Cabinet of Ministers of Ukraine "On Approval of the Action Plan for 2023-2024 for the Implementation of the National Strategy for the Creation of a Barrier-Free Environment in Ukraine for the Period up to 2030" dated April 25, 2023



have pointed out that the plan lacks a clear assessment of its impact on the quality of life and rights of persons with disabilities⁴⁷⁷. In response, new indicators aimed at measuring the impact on persons with disabilities are being incorporated into the process⁴⁷⁸.

While initiatives like the "Barrier-Free Reconstruction"⁴⁷⁹ and "Barrier-Free Recovery"⁴⁸⁰ projects emphasize improving accessibility standards and modernizing public spaces, there is no evidence of dedicated budget allocations for these efforts in publicly available sources. Accessibility is highlighted in key areas⁴⁸¹ such as infrastructure restoration, urban modernization, healthcare, and social protection. However, OPDs have expressed concerns that these measures are not systematic or interconnected⁴⁸². For example, the section on building and urban planning mentions construction but lacks specific implementation details. The Working Group on Recovery Planning⁴⁸³ has acknowledged the low level of accessibility in transport and has underscored the need to incorporate modern accessibility standards into infrastructure restoration processes. Additionally, the reform implementation plan prepared as part of the European Commission's proposal for the Ukrainian Facility⁴⁸⁴ emphasizes accessibility as a critical element in improving quality of life, supporting workforce development, and encouraging Ukrainians abroad to return.

Reform chapter seven 'Human Capital', outlined in the plan, Ukraine Facility⁴⁸⁵, specifically highlights the importance of accessible housing, removing barriers to construction, and enhancing housing quality. Investments in transport are deemed essential, emphasizing sustainable development and inclusivity for older adults and persons with disabilities.

The Ministry of Infrastructure has also highlighted the inclusiveness of the recovery process⁴⁸⁶, aligning with the Digital Recovery Accountability Framework (DREAM)⁴⁸⁷. This framework incorporates principles such as sustainability and the New European Bauhaus approach⁴⁸⁸ in recovery efforts, in partnership with UNDP⁴⁸⁹.

Climate Adaptation

On 30 May 2024, the Cabinet of Ministers of Ukraine approved the Strategy for the Formation and Implementation of State Policy on Climate Change for the Period up to 2030, along with an action plan for 2024–2025⁴⁹⁰. A framework draft law, On the Basic Principles of State Climate Policy in Ukraine, was also prepared, aligning with the broader goals of the Ukraine Facility Plan.

Despite these initiatives, no evidence could be found of the participation of persons with disabilities or civil society organizations (CSOs) in the development of these climate policies. The content of the Strategy does not explicitly address the impact of climate change on persons with disabilities. While the Strategy aims for a socially just transition to low-carbon development, its indirect benefits for disability

477. Advocating for accessibility. National Assembly of People with Disabilities of Ukraine <https://naiu.org.ua/70483-2/>

478. As per meeting with Tetiana Lomakina, 30.10.2024, with WHO

479. The project includes the creation of new accessibility standards, the training of specialists and the restoration of public spaces by the end of 2024. 100% of new buildings and reconstructions must meet accessibility standards, <https://shorturl.at/zNPT3>

480. It includes the development of new and revision of existing state building codes, the introduction of a mechanism of state control over non-compliance with accessibility standards and monitoring of facilities <https://shorturl.at/cQUY7>

481. conference materials: <https://www.urc-international.com/conference-materials>

482. Information on the Recovery Plan of Ukraine. Fight for Rights [here](https://www.kmu.gov.ua/storage/app/sites/1/recoveryrada/ua/restoration-and-development-of-infrastructure.pdf)

483. <https://www.kmu.gov.ua/storage/app/sites/1/recoveryrada/ua/restoration-and-development-of-infrastructure.pdf>

484. Draft document as of 27.12.2023. Received through unofficial channels via Regenerate Ukraine Initiative WWF, www.wwfcee.org

485. <https://www.ukrainefacility.me.gov.ua/en/>

486. https://kse.ua/wp-content/uploads/2024/01/Posibnik-iz-vidnovlennya.pdf?fbclid=IwAR3Aosh0tI71ZAnkzwEftVf2Z4GVJmccUxLY_WecgnWDLWVo7ijUxy2-DQ

487. <https://dream.gov.ua/ua>

488. https://new-european-bauhaus.europa.eu/about/about-initiative_en

489. <https://dream.gov.ua/ua/special/sustainabilityrestoration>

490. <https://zakon.rada.gov.ua/laws/show/483-2024-%D1%80#Text>



inclusion remain speculative⁴⁹¹. To ensure effective disability mainstreaming, future climate adaptation efforts must include active consultation with OPDs, and consideration of the unique vulnerabilities faced by persons with disabilities in the context of climate change. This would help achieve a genuinely inclusive approach to environmental sustainability and resilience.

11. Analysis of key gaps and opportunities

The humanitarian crisis in Ukraine, compounded by the escalation of the conflict in 2022, has significantly deepened the challenges faced by persons with disabilities, exacerbating long-standing issues of inaccessibility, exclusion, and systemic inequality. Before the full-scale invasion, persons with disabilities in Ukraine already experienced significant barriers in accessing essential services, participating in decision-making processes, and exercising their rights⁴⁹². The conflict has further disrupted critical services, destroyed infrastructure, and widened gaps in protection, inclusion, and accessibility. At the same time, systemic barriers persist, and the implementation of inclusive policies remains inconsistent, particularly at the regional and local levels.

Despite these challenges, efforts to address the needs of persons with disabilities have been underway, with notable progress achieved through initiatives like the National Strategy for the Creation of a Barrier-Free Environment, the EU accession plan “Ukraine Facility”, the technical support for recovery, including building back better approaches, enhancing Disability Inclusion in Humanitarian response planning and the involvement of organizations of persons with disabilities (OPDs) in advocacy and planning as well as strengthening the veterans' movement. This analysis identifies the key gaps that continue to hinder the realization of the rights of persons with disabilities and outlines opportunities to address these challenges comprehensively and sustainably. By examining these gaps and opportunities, this section provides a roadmap for strengthening disability inclusion and ensuring alignment with the principles of the UN Convention on the Rights of Persons with Disabilities (UNCRPD).

Humanitarian Response (OCHA) and emergency procedures (government)

Persons with disabilities in Ukraine face significant barriers in evacuation and access to shelters during emergencies, issues that have worsened with the ongoing conflict⁴⁹³. Many evacuation procedures at the oblast level remain inaccessible, failing to account for the specific needs of persons with disabilities. Reports indicate that shelters, including metro stations and basements, are often inaccessible to individuals with mobility or sensory impairments⁴⁹⁴. For example, a participant with a physical disability described standing outside during heavy bombing because they could not access shelter. Additionally, collective sites disproportionately house persons with disabilities and older individuals, yet these spaces fail to meet basic accessibility standards⁴⁹⁵.

Targeted support during emergencies, such as personal assistance for individuals with disabilities with high support needs or quiet spaces for those with psychosocial or intellectual disabilities, is

491. <https://zakon.rada.gov.ua/laws/show/483-2024-%D1%80#Text>

492. <https://www.kmu.gov.ua/reformi/efektivne-vryaduvannya/reforma-decentralizaciyi>

493. There is no obligation for developers to build modular houses in compliance with accessibility requirements Resolution No. 1340 of the Cabinet of Ministers of Ukraine “Some Issues of the Functioning of Architectural and Construction Control and Supervision Bodies” dated December 23, 2020, <https://zakon.rada.gov.ua/laws/show/1340-2020-%D0%BF#Text>; Recommendations for ensuring the accessibility of temporary or permanent facilities accommodation for persons with disabilities. NGO “National Assembly of People with Disabilities of Ukraine” together with the NGO “PRO. UD/Universal Design” commissioned by UNDP. 2022. Available at: <https://shorturl.at/goGM9>

494. DBN V.2.2-5:2023 Protective structures of civil defense. Buildings and structures. Available here: <https://dbn.co.ua/load/normativy/dbn/1-1-0-390>

495. CCCM cluster (2023): monitoring. Available here: https://www.cccmcluster.org/sites/default/files/2023-05/CCCM_2023_CSM%20R7_ukr.pdf



largely unavailable⁴⁹⁶. Although regulatory frameworks such as Resolution 930 mandate accessibility, implementation remains inconsistent, further exacerbating risks during emergencies. Processes at the oblast level lack clear frameworks for integrating disability-inclusive protocols.

The Humanitarian system started working on Disability Inclusion (see [above](#)) and implementing some initiatives in coordination with clusters (e.g. vulnerability assessment at collective sites), ensuring HNRP planning 2025 is including OPDs, Health and Protection Cluster operational planning or updating the shelter standards. However, there is momentum to ensure a more inclusive humanitarian responses building on existing initiatives and capacities. For example, information about the location and specific needs of persons with disabilities, as well as the availability of accessible vehicles and accommodations, is rarely systematically collected or utilized effectively. Through existing cross-cluster cooperation and multi-sectorial approaches as well as ensuring knowledge of the Human Rights of Persons with Disabilities especially through the ADTWG, this can be enhanced. In addition, support should be provided for strengthening OPDs' capacities for active participation in humanitarian response planning and advocacy to clusters and humanitarian implementing agencies.

Poverty and Economic Vulnerability

The war has worsened poverty among persons with disabilities, making them more dependent on government benefits and humanitarian aid. Employment opportunities are limited, and many face systemic barriers such as inaccessible workplaces and discriminatory hiring practices. Despite legal obligations for employers to create accessible jobs, clear regulations and enforcement mechanisms are weak⁴⁹⁷. Employers frequently evade hiring quotas by claiming a lack of qualified applicants with disabilities, while educational opportunities including vocational training remain inadequate⁴⁹⁸.

The situation is compounded by the destruction of infrastructure and displacement of skilled personnel, which has limited access to social services and further marginalized persons with disabilities. Households with members with disabilities are three times more likely to experience severe or extreme needs across multiple sectors, as confirmed by Multisectoral needs assessment (MSNA) data from 2024⁴⁹⁹.

The current public policy agenda can help overcome this. Within the EU Accession, the GoU has to implement Directive 2000/78 EC on equal employment, especially ensuring reasonable accommodation. The adoption of the new Law on ensuring the Right to work of persons with disabilities is a framework to change the system of encouraging employers to hire persons with disabilities and ensuring reasonable accommodation. Within these ongoing reforms advocacy efforts enhancing disability-inclusive workspaces are an opportunity also for OPDs to enhance their capacities to support new regulations. Enhanced by research or collecting of best practices and lessons learned on ensuring reasonable accommodations and Inclusive employment is important to ensure evidence base and capacity building across enterprises. Supporting existing pilot projects at oblast or local level to foster inclusive workspaces and integration into the labour market are opportunities to support change. Partly due to the war the stigma around disability is slowly changing and adopted workplaces are necessary to support veterans and civilians living with disabilities now. This is an opportunity in combination with an information campaign to further combat stigma and promote the employment of persons with disabilities into the labour market.

496. FFR (2022): Evacuation of people with disabilities. Analytical report.

497. FFR (2022): Alternative report: The principle declared in Article 27 of the Convention to be able to freely choose or agree to work in conditions where the labor market and the working environment are open, inclusive and accessible.

498. Ibid., Judgment in case No. K/9901/13878/18 of 22 August 2018, accessed <https://reyestr.court.gov.ua/Review/7600866>

499. MSNA: gender, age and disability snapshot. Accessed [here](#)



Self-Determination and Institutionalization

Many persons with disabilities in Ukraine remain at risk of institutionalization, a challenge compounded by inadequate access to community-based services, evacuations and independent living options. Institutional care facilities, especially in conflict-affected areas, are often overcrowded and underfunded, creating unsafe conditions⁵⁰⁰. The ongoing conflict has exacerbated this issue by disrupting social services, limiting the availability of alternative facilities, and increasing the movement of individuals in need of assistance into institutional care.

Additionally, legal capacity restrictions remain a critical barrier to self-determination. Approximately 35,000 individuals with disabilities are under full guardianship, depriving them of the right to make decisions about their lives⁵⁰¹. Individuals under guardianship continue to face exclusion from social, economic, and political participation.⁵⁰² The GoU just declares learning of experience and practices to decision making with support, while reforms are ongoing but slow.⁵⁰³

Supporting the transition from institutional care to community-based services, as outlined in the Barrier-Free Environment Strategy, will enhance the independence and well-being of persons with disabilities. The deinstitutionalization policy is a part of EU accession plan “Ukraine Facility”. The GoU adopted the Strategies on DI services for adults with disabilities 2024 and newly developed Action plan (Jan. 2025) to implement the first stage of the DI strategy for adults (see [Section 5](#)). Within this development to provide baseline research of current legislation for drafting the changes is an opportunity to inform the 2nd action plan (starting 2027). This should include research and support for OPD advocacy efforts to align the national DI policy and language with UNCRPD and EU standards and principles. Additionally, it should involve providing evidence-based information to strengthen the capacity of social workers and community authorities through training programs, educational initiatives, and pilot projects. As mentioned above, the awareness-raising campaign to combat stigma could support forming public opinion around independent living and deinstitutionalization. Sharing lessons learnt about independent living pilots can further enhance local authorities’ information about budgeting practices aligning with CRPD. The other type of priorities, as stated in a recommendation to pilot supported services, such as independent living with support and home-based care.

Disability assessment

Additionally, national legislation and policy frameworks largely adhere to outdated medical and charitable models of disability, with limited alignment to the UNCRPD⁵⁰⁴. Although some progress has been made, such as reforms in disability certification processes, significant gaps remain. For example, the legal translation of “person with disability” in Ukraine is based on outdated terminology, reflecting a medical model rather than a rights-based approach⁵⁰⁵. Reforming disability certification and service provision processes will help ensure they are inclusive and accessible. The Government of Ukraine (GoU) has

500. The submission available [here](#)

501. The number of persons declared legally incapable by a court varies. According to the Ombudsman:

- according to the CEC as of 24.02.2022 – 35372 persons;

- according to the Ministry of Social Policy as of 01.01.2023 – 36880 people;

- according to the National Social Service as of 01.07.2023 – 31075 people;

502. FFR (03.07.2024) preparatory report for the report to the UN committee on the rights of persons with disabilities.; <https://suspilne.media/kropyvnytskiy/577695-u-kropivnickomu-nareceni-aki-maut-porushenn-zor-odrulizisa-z-drugoi-sprobi-comu-im-persogo-razu-vidmovili/>; Ibid.: Lack of elevator and 2nd floor location of the office leading to not submitting documents to a sole proprietorship in person

503. Decision of the Constitutional Court of Ukraine as of October 11, 2018 No. 8-r/2018 “in the case on the constitutional petition of the Commissioner for Human Rights of the Verkhovna Rada of Ukraine on the compliance with the Constitution of Ukraine (constitutionality) of certain provisions of part two of Article 8, the second sentence of part four of Article 16 of the Law of Ukraine “On Citizens’ Appeals” (case on the appeal of persons recognized by the court as incapable)” // <https://zakon.rada.gov.ua/laws/show/y008p710-18#n73>

504. Version of 2017 of the rehabilitation law: <https://zakon.rada.gov.ua/laws/show/2961-15/ed20170807#Text>

505. See UKR translation of the UNCRPD here: https://zakon.rada.gov.ua/laws/show/995_g71/ed20061213#Text



committed to developing a law to implement the ICF. Opportunities for support include collecting best practices and lessons learned from the EU, particularly from piloting the European Disability Card and efforts to harmonize disability assessment criteria at the EU level. Additionally, supporting OPDs in these broad reforms is crucial to ensuring meaningful participation and empowerment.

Monitoring and accountability

Despite the existence of various mechanisms for monitoring the implementation of strategic documents and the accountability system remains insufficient.⁵⁰⁶ Numerous mechanisms, such as Inter-agency groups on Human Rights Strategies and SDGs, lack clear monitoring indicators, objective data analysis as well as lack of capacities of local and regional monitoring bodies, such as local barrier-free council.

One opportunity, however, is the barrier-free council, which is aiming to review indicators and action plans as well as develop the oblast and local councils.⁵⁰⁷ Enhancing OPDs' participation in the Barrier-Free Council is critical. Strengthening monitoring systems to track compliance with accessibility standards and CRPD principles will improve accountability and effectiveness. It is essential to build the capacity of local-level Barrier-Free Councils, establish clear indicators for monitoring, and align their efforts with national Barrier-Free Council action plans. Ensuring OPD participation throughout this process and supporting indicator development will further strengthen these efforts. As existing tools (e.g., the DREAM platform) are currently under review, technical support should be provided to update and harmonize different monitoring tools and develop clear criteria based on CRPD and other accessibility and universal design standards.

Currently, OPDs' advocacy efforts at the European Commission level have contributed to the inclusion of human rights challenges for people with disabilities in the pre-accession progress report. At the same time, negotiating working groups have been established as mechanisms for monitoring reform progress, including the participation of OPDs and CSOs (see chapter 10). These efforts need continued support.

Creating an independent system to monitor UNCRPD implementation will provide a framework for tracking rights violations, documenting best practices, and conducting participatory research. This system should involve OPDs to ensure it is representative and effective. The opportunity is to strengthen the capacity of the existing Ombudsman, which aligns with the Paris Principles.

Policy Frameworks and coordination

A centralized, multi-sectoral mechanism that coordinates efforts across the humanitarian, recovery, and development phases was not established. Before the full-scale invasion, the Council of Persons with Disabilities in the Cabinet of Ministries, covering different disability issues beyond specific strategies or action plans, has this role. Now a variety of coordination mechanisms have been established and operate around specific areas of public policy that include disability rights issues. In addition to a fragmented coordination system, UNCRPD standards are not coordinated across various policies and implementing stakeholders. For example, some selected pilot projects in line with enhancing the DI strategy for assisted living services within institutions⁵⁰⁸ fail to align with the UNCRPD's understanding of deinstitutionalization. Accessibility requirements for public infrastructure are often ignored. State

506. Reflected in the Barrier free meeting on 30.10.2024

507. As introduced by T. Lomakina on 31. October 2024 in the meeting Topic: Presentation of the Action plan for 2025-2026 to implement the national strategy for creating a barrier free environment in Ukraine until 2030'

508. combined second and third reports of Ukraine on the implementation of the CONVENTION ON THE RIGHTS OF PERSONS WITH DISABILITIES // https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2fC%2fUKR%2f2-3&Lang=en



building codes include specific standards, but compliance is inconsistent⁵⁰⁹. For instance, a 2020 audit of 45 objects under the Large Construction Program found that none fully adhered to state accessibility standards, and 10 were deemed entirely inaccessible⁵¹⁰. Martial law has further complicated enforcement, with inspections significantly reduced⁵¹¹.

The Ministry of Social Policy of Ukraine (MoSP) as key stakeholder responsible for coordinating the implementation of the CRPD in Ukraine. Due to the war humanitarian response mechanism has been set up, leading the coordination of the humanitarian response in Ukraine including clusters, working groups and areas of responsibility led by the Humanitarian country team (HCT). Within the EU Accession Mechanisms, the implementation of the CRPD needs to be aligned with the EU's accession criteria, including disability rights and social inclusion. A government planned Deinstitutionalization Task Force – a mechanism focused on implementing the national strategy for DI is planned as well.

To improve coordination mechanisms between national and oblast level, one of the most effective opportunities is the Barrier-Free Council (see stakeholder). This mechanism works both on national and oblast levels with established community-based barrier-free councils. The participation of OPDs in the National Barrier-free Council could be enhanced as well as the local barrier-free council capacities regarding accessibility standards.

In addition, national level coordination mechanisms are essential for ensuring effective CRPD implementation from humanitarian to recovery and beyond. Establishing clear evacuation protocols that include accessible vehicles, accommodations, and services can significantly reduce risks for persons with disabilities during the war. The recently signed Ukrainian coordination framework, the developed results groups and the UN disability-group are opportunities to ensure disability-mainstreaming and CRPD compliance as well as OPD participation at UNCT. Connecting UN Disability Inclusion focal points and OPDs in the UN disability-group could promote Disability Rights across strategies. Promoting awareness and increasing capacities among legal and policy and other professionals about disability rights and standards can improve the consistent application of these reforms. Building on existing mechanisms is a key opportunity in Ukraine to enhance coordination, this needs to include capacity development, OPD participation as well as sharing standards and good practices.

Participation and Representation

Organizations of persons with disabilities (OPDs) have made strides in advocating for disability inclusion but continue to face barriers to meaningful participation. OPDs are often excluded from early stages of policy-making and humanitarian planning, limiting their ability to influence outcomes. This issue is particularly evident at the local level, where governance mechanisms frequently fail to include OPDs or individuals with disabilities in decision-making processes.

While mechanisms such as the Barrier-Free Council offer platforms for engagement, feedback loops are weak⁵¹². OPDs have highlighted that their contributions to planning sessions are often not reflected in final decisions, reducing their trust in these processes. Further supporting OPDs participation in these

509. In 2020, 71 reception departments of healthcare facilities, 101 sports facilities, and 114 schools were reconstructed or built as part of the President of Ukraine's Big Construction programme. The main objective of the project in 2021 is to build or reconstruct 6.6 thousand km of roads, 74 schools, 54 kindergartens, 28 medical institutions, more than 140 reception departments and 340 medical outpatient clinics in rural areas, 24 swimming pools and 78 other sports facilities.' // <https://bigbud.kmu.gov.ua/>

510. As part of the National Partnership - Coordinated Accessibility project implemented by the National Assembly of Persons with Disabilities, accessibility audits were conducted in 2021 at 45 Big Construction project sites in Chernivtsi, Cherkasy, Kherson, Kharkiv, Ivano-Frankivsk, Zaporizhzhia, Mykolaiv, Vinnytsia, Dnipro, Zhytomyr, Poltava, Donetsk, Sumy, Lviv and Rivne regions.

511. Information during the barrier-free meeting, Annex 4.

512. Survey conducted by FFR in early July 2024.



mechanisms, such as the barrier-free council or the Age and disability technical working group, as central technical group within the cluster system. The chair of the ADTWG is also present in the ICCG, ensuring continuation of disability-related issues at various levels. Based on processes established in 2024, the HNRP process ensured OPD participation alongside civil society consultation. Currently, several OPDs are included in national and regional coordination mechanisms, while there is no information available which sub-national cluster or general coordination meeting OPDs regularly attend.

Supporting OPDs through capacity-building initiatives including supporting resources and enhance partnerships with implementing agencies/NGOs will enable them to play a more active role in monitoring CRPD implementation and participating in policymaking. Creating mechanisms for early and meaningful engagement of OPDs recovery planning, such as the UN disability group, will ensure their perspectives inform inclusive policies and programs. Within current processes, like the EU accession, to support the GoU to update the legal definition of OPDs in accordance with the UNCRPD and drafted the policy to support OPDs to effectively participation in implementation and monitoring of UNCRPD. In addition, currently OPDs are strongly advocating for reforms withing EU accession – Deinstitutionalization, employment, accessibility, housing, other. These efforts need to be meaningfully included in policies, strategies and coordination mechanisms.

Accessibility

Accessibility remains a critical gap across public spaces, transportation, and shelters⁵¹³. Despite the adoption of updated building codes in 2022, compliance is inconsistent, with many facilities failing to meet minimum accessibility standards. Surveys conducted as part of the Barrier-Free Strategy revealed that only 10% of public facilities were fully barrier-free, while 33% were partially accessible⁵¹⁴. In addition, surveys and assessments are often conducted by facility managers, leading to potential biases and unreliable data.

Data collection on accessibility is similarly inadequate, with no centralized system to track progress or identify specific gaps⁵¹⁵. This lack of information hinders effective policy-making and resource allocation.

Thus, focusing on ensuring recovery programs, such as Building back better and EU Accession planning, and ensuring CRPD compliance and new construction compliance is enhanced.

Support could be provided for the development of new tools to monitor accessibility and collect data in combination with piloting these tools on oblast and local levels. These tools and mechanisms must ensure OPDs' participation. Another opportunity is to unify criteria in different tools and platforms, such as DREAM and enhance universal design standard uptake. Developing a centralized data system to track accessibility across sectors will provide valuable insights for targeted interventions, especially in light of current recovery efforts across the country.

Intersectional Discrimination

Women and girls with disabilities face compounded barriers, including exclusion from gender equality policies and protection services. These challenges are particularly pronounced in areas such as healthcare, education, and response to gender-based violence⁵¹⁶. Current policies often fail to account

513. State survey: <https://bbu.org.ua/dumki-ta-poglyadi-ukrainciv-shhodo-bezbar-iernosti-v-suspilstvi/>

514. including over 16,000 educational institutions, 8,000 health care, structural units of the pension fund and social protection, civil defense facilities, employment centers, airports, and train stations; 27.10.2021 Regular meeting of the Barrier-Free Council // https://www.youtube.com/watch?v=N_vv6xQeM_E

515. Order of the Cabinet of Ministers of Ukraine dated 14.04.2021 No. 366-r 'On Approval of the National Strategy for Creating a Barrier-Free Space in Ukraine for the Period up to 2030' // <https://zakon.rada.gov.ua/laws/show/366-2021-%D1%80#Text>

516. Un Women (2023): Women with disabilities in Ukraine. Article [here](#).



for the intersectionality of gender and disability, leaving this group underserved and vulnerable. For instance, women with disabilities are often excluded from both gender equality initiatives and disability-specific programs, creating significant gaps in support and services.

Further integrating gender and disability considerations into all national policies, particularly in areas such as health, education, and protection from gender-based violence, will address the unique challenges faced by women and girls with disabilities. Fostering linkages between newly developed LGBTQI+ Working group (protection cluster) with OPDs, ensuring OPDs with a women's rights focus to join the UN disability-group and enhancing connection between other gender work-streams and disability will be opportunities to enhance supporting gender related discriminatory practices. In addition, employment support or other information campaigns should focus on ensuring experiences of women and underrepresented groups are shared and included meaningfully, e.g. building on collaborations and work from OPDs and UNWOMEN⁵¹⁷.

12. Recommendations to the UN country team

The following recommendations address the above-mentioned key gaps and challenges while aligning with the UNCRPD Committee's 2015 and 2024 Concluding Observations and the guiding principle of the global disability movement: "Nothing about us, without us." This principle emphasizes the essential involvement of persons with disabilities and their representative organizations in all decision-making processes that impact them and their families. Governments, the UN, and partners must meaningfully engage OPDs and provide institutional support to address their capacity-building needs.

Strengthening OPDs' internal capacities is vital for planning, implementing, monitoring, and evaluating programs effectively, including meeting funding bodies' due diligence requirements. Such investments are vital to placing OPDs on equal footing with other civil society organizations, improving their inclusion in Ukraine's recovery efforts and progress toward EU integration. Recommendations for UNCT prioritize OPD engagement as a cornerstone of disability-inclusive reforms, ensuring government policies and monitoring mechanisms address the diverse perspectives and needs of Ukraine's disability community, including marginalized groups.

A gender-sensitive and intersectional approach is essential, recognizing that persons with disabilities are not a homogenous group. Socially ascribed roles and compounded barriers affect women and girls with disabilities, children, Roma, LGBTQIA+ persons, and those with psychosocial and intellectual disabilities. Veterans and civilians acquiring disabilities due to the ongoing war also have specific needs that must be factored into all recommendations.

The recommendations focus on ensuring meaningful OPD participation, mainstreaming disability inclusion in recovery and policy frameworks, and prioritizing accessible reconstruction under the "build back better" principle. They also call for accelerating deinstitutionalization to promote community-based services and enhancing coordination within the UNCT. These measures aim to create an inclusive recovery process that addresses the evolving needs of Ukraine's disability community, including veterans and individuals living with disabilities due to the war.

517. Human rights of Women and girls with disabilities here: https://eca.unwomen.org/sites/default/files/Field%20Office%20ECA/Attachments/Publications/2019/06/CEDAW%20CRPD%20Guide%20ENG_compressed.pdf



STRENGTHEN ACCESSIBILITY IN PHYSICAL ENVIRONMENTS, TRANSPORT, INFORMATION, AND SERVICES

What needs to change:

Ensuring that all environments, transportation systems, and information services are accessible to persons with disabilities is foundational to achieving inclusive recovery and development. This requires systemic reforms, technical guidance, and monitoring mechanisms to align with CRPD standards. The recommendations below aim to support the implementation of the Barrier-Free strategy and action plan (once approved).

1. The Ministry for Communities and Territories Development of Ukraine (The Ministry of Development) shall according to the barrier free action plan:
 - establish a mechanism to monitor accessibility of public transportation:
 - adopt the existing standards of public transport (railway, buses, tram, etc.) to ensure accessibility is meaningful mainstreamed
 - identify a way of collecting data around transportation including working with transportation enterprises and authorities to collect these data.
 - reviewed the DREAM criteria to include accessibility criteria and adhere to accessibility standards according to state norms.
 - review the existing database for collecting data of buildings and refine the current self-reported monitoring mechanism to strengthen accessibility reporting including involvement of OPDs
 - should prepare a Draft Law and action plan to align national legislation with the Regulation (EU) 2021/782 of the European Parliament and of the Council of 29 April 2021 on rail passengers' rights and obligations
2. According to existing accessibility standards and building norms each building shall apply to state standards (Barrier-Free strategy). The Ministry of Health, Ministry of Education and the National bank should adopt accessibility criteria into their license procedures.
3. The Ministry of Culture and Strategic communication in accordance with the barrier free strategy shall:
 - should develop a Draft Law to amend the Law of Ukraine "on Media" to expand using the Sign Language and accessible formats on private television and services on demand
 - Develop an action plan to increase the use of sign language and accessible formats by public and private providers, ensuring the implementation of the Audiovisual Media Services Directive (Directive (EU) 2018/1808).
 - As a monitoring mechanism under the ministry, the National Television and Radio Broadcasting Council of Ukraine should, in collaboration with OPDs, develop criteria for monitoring the accessibility of audiovisual media to ensure the implementation of the Audiovisual Media Services Directive (Directive (EU) 2018/1808).
4. The Ministry of Digital Transformation and the State Committee on Radio and Television in Ukraine should:
 - Develop action plans to align monitoring for the accessibility of the official website including mobile application with national standards.
 - Update legislation to ensure the alignment with the Directive (EU) 2016/2102 on the accessibility of the websites and mobile applications within the public sector bodies.
 - Lastly, develop an action plan and adopt monitoring to EU standards as per adopted legislation in line with EU direction 2016/2102



5. The Ministry of Education and Ministry of Culture and Strategic Communication should:
 - adopt the National standard of plain Language and easy to read format
 - prepare action plans to use plain Language and formats in official communication.
 - Develop a draft law on the use of sign language and prepare an action plan to promote its use in the public and private sectors, including educational programs for sign language interpreters.
6. All ministerial members of the Barrier-Free Council should:
 - provide training for experts who implement and assess national standards and regulations regarding accessibility and universal design principles.

To accelerate these changes, UNCT specifically shall:

- Ensure all construction and rehabilitation projects by UN agencies meet GoU accessibility standards, with mandatory monitoring under the Barrier-Free Action Plan.
- Provide technical assistance to develop and pilot accessible communication tools, including videos, social media, and printed materials.
- Offer financial and human-resource support to strengthen GoU mechanisms for accessibility compliance and enforcement.

ADVANCE DEINSTITUTIONALIZATION AND STRENGTHEN INDIVIDUALIZED SUPPORT

What needs to change:

Transitioning from institutional care to community-based solutions is critical for upholding the dignity and autonomy of persons with disabilities. Efforts should focus on developing sustainable support systems that enable independent living and ensure equitable access to services in line with the strategy and action plan.

1. The ministry of health, social policy, education and economy shall:
 - Prepare draft law to reform the disability assessment system to adopt the International Classification of Functioning (ICF), ensuring streamlined and equitable access to medical services, rehabilitation, and assistive technologies
 - Develop and pilot models for independent living, in coordination with the deinstitutionalization strategy for children
2. Ministry of social policy
 - reform the Social Protection system including benefits and services provided based on the new ICF revision
 - Enhance the need-based support to persons with disabilities ensuring a rights-based approach
3. Ministry of Social Policy with involving the Territorial Communities Self-Government shall:
 - prepare a mechanism of finance support to Communities or Persons with Disabilities for providing home-based supported services
 - Strengthen local authorities' capacity to provide social services, with financial and organizational support to meet the diverse needs of persons with disabilities, including veterans and other vulnerable groups.
 - Introduce case management services to facilitate timely access to rehabilitation, prostheses, and assistive devices at the community level.



To accelerate these changes, UNCT specifically shall:

- Provide technical and financial assistance to reform social protection systems and develop inclusive housing models.
- Commit to adhering to CRPD guidelines by refraining from rebuilding institutional facilities, prioritizing independent living solutions instead.
- Provide technical support to ministries and local authorities to enhance case-management capacities.

MAINSTREAM DISABILITY INCLUSION IN HEALTH, EDUCATION, EMPLOYMENT, AND RECOVERY

What needs to change:

Integrating disability inclusion across all sectors is essential for equitable access to services and opportunities, particularly in health, education, and employment. This mainstreaming process must be guided by inclusive practices and CRPD principles.

1. The Ministry of Health to mainstream access to health in line with CRPD:
 - develop a plan to implement health facility audits across Ukraine
 - develop specific action plans per facility in collaboration with local authorities to implement identified steps to enhance accessibility of the health care facility and services provided.
2. The Ministry of education to mainstream access to education in line with CRPD shall:
 - apply reasonable accommodation based on identified individual needs,
 - promote teacher training around inclusive education (e.g. at the post graduate institute for teachers)
 - promote the use of Ukrainian Sign Language and accessible formats to comply with the National Strategy for the Development of Inclusive Education for the period up to 2029.⁵¹⁸
 - Support inclusive higher education by developing resource centers and piloting accessibility projects as well as reasonable accommodation based on needs.
3. The ministry of economy and ministry of social policy to mainstream access to employment in line with CRPD shall:
 - Identify steps to implement the new Law on Ensuring Rights to Employment of Persons with Disabilities⁵¹⁹ (e.g. develop employment strategies, including vocational training, reasonable accommodation, and incentives for hiring persons with disabilities),
 - To develop a draft Law to harmonize the national Legislation with Employment Equality Directive 2000/78/EC

To accelerate these changes, UNCT specifically shall:

- Assist in developing accessible and inclusive service delivery guidelines for health, education, and employment sectors.
- Promote inclusive evacuation and recovery protocols, including training for emergency workers and enhancing shelter accessibility.
- Commit to hiring practices that make UN agencies employers of choice for persons with disabilities, addressing workplace accessibility, negative attitudes, and recruitment barriers.
- Provide technical support to higher-education pilot in collaboration with respective universities and ministry education



HARMONIZE LEGISLATION WITH THE UNCRPD

What needs to change:

Aligning national laws and policies with CRPD standards is necessary to establish a cohesive legal framework that protects and promotes the rights of persons with disabilities. This includes identifying and reforming discriminatory provisions and enhancing monitoring mechanisms.

1. The Cabinet of Ministers with technical coordination from Ministry of Social Policy, with participation of the Ombudsman and OPDs
 - Conduct a legislative review to identify discriminatory provisions and conclude gaps in CRPD compliance.
 - Based on the conclusion draft new law in identified sectors
2. Parliament of Ukraine shall in accordance with the UNCRPD:
 - establish independent monitoring mechanisms, entrusting the Ombudsman or creating another Paris Principles-compliant institution with this role.
3. The Ombudsman, The Ministry of Justice, The Free Legal Aid Coordination Center, National School of Judges of Ukraine:
 - Train staff across the judicial and human rights systems on CRPD implementation, emphasizing reasonable accommodation and accessibility rights.

To accelerate these changes, UNCT specifically shall:

- Provide resources for legislative harmonization efforts and OPD participation in monitoring CRPD implementation.
- Enhance the capacity of accountability institutions through targeted training and funding.

COMBAT STEREOTYPES AND RAISE AWARENESS

What needs to change:

Changing societal attitudes toward persons with disabilities is a critical step toward fostering an inclusive society. Awareness campaigns and capacity-building programs should promote the capabilities of persons with disabilities and challenge stigmatizing narratives.

1. Ministry of Culture and Strategic Communication, Ministry of Education together with OPDs and National Public Television and Radio Company of Ukraine to combat stigma shall:
 - Conduct and increase awareness campaigns targeting schools, universities, media, and public institutions to address negative attitudes.
2. The Ministry of Education together with OPDs and universities and training facilities in order to enhance awareness and knowledge shall:
 - Train government officials, service providers, and sector professionals on disability rights, with a focus on underrepresented groups such as women, veterans, and persons with intellectual disabilities.



To accelerate these changes, UNCT specifically shall:

- Develop attitudinal change campaigns emphasizing the contributions of persons with disabilities to society, in close collaboration with OPDs or supporting OPDs to implement campaigns
- Conduct training programs for UN staff on inclusive services and accessibility, ensuring alignment with the UN Disability Inclusion Strategy.

ESTABLISH CRPD-COMPLIANT BUDGETING

What needs to change:

Implementing CRPD-compliant budgeting practices is fundamental to ensuring resources are allocated effectively to meet the needs of persons with disabilities. Accurate data collection and transparent financial systems are key to this process.

1. The State Statistic Services to establish a centralized database to collect disaggregated data by disability, sex, and age, displacement as well as conflict affected areas serving as a baseline for policy development.
2. The Ministry of Finance and Ministry of Economy shall:
 - develop procurement policy (including mechanism for non-compliance) for the public sector that includes accessibility and universal design requirements for compliance with all purchased goods and services.
3. All ministries
 - Transparently budget with ministry of Finance support for policy reforms and services for persons with disabilities in targeted and mainstream programmes, so that expenditures can be tracked.

To accelerate these changes, UNCT specifically shall:

- Develop guidelines for CRPD-compliant budgeting and allocate resources for reasonable accommodations in UN programs.
- Conduct capacity-building and cognitive testing for data collection using the Washington Group protocol.
- Support MoSP regarding costing analysis for new DI action plan

STRENGTHEN COORDINATION AND PARTICIPATION

What needs to change:

Coordinated efforts across government, UN agencies, and OPDs are necessary to ensure a unified and effective approach to disability inclusion. Active participation of persons with disabilities and OPDs is critical in shaping and monitoring these efforts.

1. The Cabinet of Ministers with technical coordination of the ministry Social Policy shall:
 - establish mechanisms for OPD participation in policy-making and monitoring, ensuring involvement from the start.
2. The Cabinet of Ministers shall:



- appoint the (currently vacant) Government Commissioner of Rights of Persons with Disabilities to enhance the national coordination framework in accordance with Art. 33 UNCRPD.
3. Barrier-free Advisor and MoSP
- Ensure OPD participation in regular barrier-free council meetings including DI action plan implementation (till interministerial task force establishment)
 - Support local-barrier-free council capacity development and adherence to national standards and action plans

To accelerate these changes, UNCT specifically shall:

- Create a UN–OPD Reference Group to review disability-specific projects and provide feedback.
- Include disability-advisory under UN cooperation framework set up
- Appoint disability inclusion focal points within UN agencies and strengthen technical expertise through partnerships with OPDs.
- Implement UNDIS evaluation results and establish a disability score card.

These recommendations provide a clear roadmap for addressing systemic gaps and fostering meaningful inclusion of persons with disabilities in Ukraine’s recovery and development. Through collaboration between the GoU, UNCT, and OPDs, Ukraine can advance toward a more inclusive, equitable society that upholds the rights and dignity of all persons with disabilities.



ANNEXES

Annex 1 questionnaire of validation sessions with persons with disabilities

This part discusses five key challenges and gaps.

- Prejudices continue to dominate society's attitudes towards people with disabilities.
- Current legislation does not comply with the Convention on the Rights of Persons with Disabilities.
- Buildings, infrastructure, information, and transportation are largely inaccessible to people with disabilities.
- The support services and social protection guarantees offered often do not take into account the obstacles faced by people with disabilities and their individual needs.
- The role and participation of organizations of people with disabilities is underestimated.

Please include participants' quotes in this section.

1. What challenges do participants think are missing from the list?

Potential questions to ask during the session

Are there any important challenges that are missing from this list?

2. How did the participants rank the main challenges and gaps? Please provide a rating of the five main challenges from 1 to 5?

Potential questions to ask during the session

- What challenges do you think are the most important and need the most attention?
- Can you give a little more detail as to why you chose these three challenges as the most important?

3. What do participants propose to do to overcome the challenges?

Suggested pathways may include: proposing long-term solutions and strategies; offering quick and/or easier solutions to overcome challenges; overcoming the challenge depends on the decisions of the authorities at the national and/or regional level and/or at the community level; The challenge cannot be overcome without the participation of international organizations or the UN in Ukraine.

The facilitator should ask in a broad context, the possible ways suggested by the participants should only be described in the report.





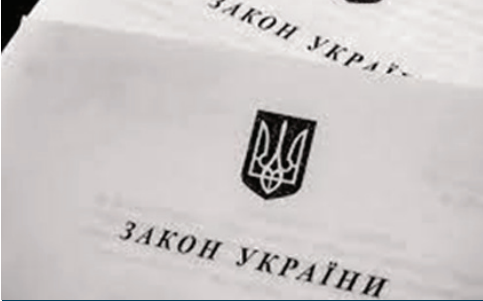
Potential questions to ask during the session



- What would you suggest doing to overcome the challenges?



Annex 2 Easy to read questionnaire

Note: translated for SitAn document and slightly adopted in size to fit the Annex.

	<p>This document has been prepared in an easy-to-read format</p>
<p>Questionnaire on the rights of people with disabilities</p>	
	<p>Good afternoon!</p> <p>Today we are talking about human rights.</p> <p>You will see a questionnaire on the screen.</p> <p>This means that I will ask you the questions that are written in this questionnaire.</p> <p>I will ask you to answer my questions.</p> <p>I ask the assistants to fill out the participant card and link in the chat.</p>
	<p>I will record our conversation on a tape recorder.</p> <p>Do you agree that I should record our entire conversation?</p> <p>I also want to take a picture of all of you.</p> <p>I hope you will agree to take a picture.</p> <p>If you don't want to be photographed, turn off the cameras.</p>
	<p>All the questions will be about your rights. We were asked to ask these questions by the staff of an international organization called the UN.</p> <p>The UN is studying the rights of people with disabilities.</p> <p>Tomorrow, we will listen to your taped answers again.</p> <p>We will prepare a document about this conversation.</p> <p>We will send this document to an organization called the United Nations.</p>
	<p>So, let's start talking about our rights.</p> <p>Remember, human rights are what people can do.</p> <p>It is written in the law.</p> <p>But sometimes the law says something about a right, but in reality a person does not have it.</p> <p>Then they say that human rights have been violated.</p>

<p>5 rights</p>	<p>First, we will talk about 5 rights of people with disabilities and their violations.</p> <p>We will talk about each right separately.</p>
	<p>And I'd like to ask you to tell me about the possibility of exercising rights in your city.</p> <p>Please take turns and raise your hand.</p> <p>Also, speak one at a time and do not interrupt others.</p> <p>Be active!</p>
	<p>Question 1.</p> <p>How people in your city treat people with disabilities.</p> <p>Whether you are not insulted because of your disability.</p> <p>Does anyone call you bad names?</p> <p>Or perhaps they make negative comments because of your behavior.</p> <p>You are not judged or scolded.</p>
	<p>Perhaps, on the contrary, you get help and sympathy.</p> <p>Tell us about the attitude of people around you.</p> <p>Also tell us if you are not ashamed to tell other people about your disability.</p>
	<p>Question 2.</p> <p>What do you know about Ukrainian laws on the rights of people with disabilities?</p> <p>Are those laws good for you?</p> <p>What exactly does Ukrainian law say about people with disabilities?</p> <p>What rights do the laws promise to people with disabilities?</p> <p>Are those laws being enforced?</p>
	<p>What rights can't you exercise?</p> <p>If you were to meet with MPs who pass laws, what would you ask them to change in the laws?</p>



Have you heard of the Convention on the Rights of Persons with Disabilities?
Do Ukrainian laws comply with this Convention?
Do people with disabilities in Ukraine have the rights described in the Convention?



Question 3.
Are buildings, transportation, streets, and information accessible to people with disabilities?
What changes are needed in the buildings where you live and visit every day?
What prevents you from using transportation easily and conveniently?
Should anything be changed on the streets for the convenience of people with disabilities?



Is all the information clear to you?
How do you find out about state aid?
How will you know that you need to go to the council and seek help?
Would you be able to recognize when you need to go and ask for help?
Do social workers tell you about your rights



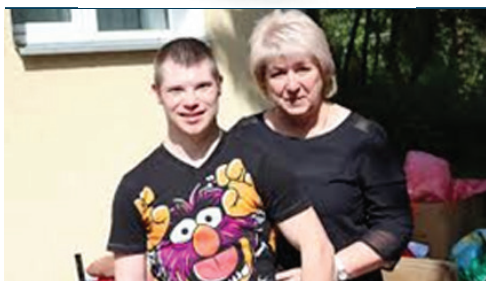
Question 4.
What kind of assistance does a person with a disability receive from the state?
Do you think it is easy or difficult to get help from the state?
As people with disabilities, you are entitled to financial assistance and services from the state.



Tell me, what kind of assistance and services do you receive from the state because of your disability?
Would you be able to receive state financial assistance and services without your mother or relatives?
Who, apart from your immediate family, helps you in your daily life and how?



How much time does your mother or your relative have to spend to get help from the state?
Does it make your mom or your relative tired?
If your mother were to fall ill, who would you turn to for help and what difficulties would you have?



Question 5.

Does the state treat your organization well?

You all go to your organization in the city where you live.
These are Dzherela in Kyiv, Tavor in Novyi Rozdil, Nadiya in Uzhhorod, Parostok in Vinnytsia, and others.
You are glad to have friends and teachers.



But what problems do organizations have?
Is it easy to get funds to pay rent and salaries?
Does your organization ever stop classes or meetings?
Does the city council provide money for the organization to conduct classes?

5 questions

So, we talked about the following 5 issues.

- Attitudes of others towards people with disabilities
- Ukrainian laws on people with disabilities
- How buildings, transportation, and information are adapted for people with disabilities
- State support for people with disabilities, money and services, and whether it is difficult to get them
- Organizations of people with disabilities.



Is everything we've talked about clear to you?
If we go back to those five questions, what is the most important?
Which of those 5 questions are not important?
What have we missed in the life of a person with a disability?



Now let's talk about the problems.
What problems do you have in your life because of your disability?
Who and how can improve the lives of people with disabilities in Ukraine?
What exactly should be done for you as people with disabilities?



	<p>Let's talk about some of the problems in your life.</p> <p>Do you want to live separately from your mother or your father's family and what kind of help do you need?</p> <p>Would you like to go to work and earn money?</p> <p>Why doesn't it work?</p> <p>What kind of help do you need to find a job?</p>
	<p>Does everyone have daily classes?</p> <p>What are the problems with going to class every day?</p> <p>Who helps you when you need to go to the doctor?</p> <p>Who helps you if you need to go to the office and submit documents or an application?</p>
	<p>Do you sometimes need the help of a personal assistant when your mom is busy or sick?</p> <p>Do you need information written in a simple way?</p> <p>What do you need simple information about?</p> <p>Do you sometimes need someone to explain something to you when you don't understand it?</p>
	<p>Do you need special transportation when it's difficult to ride a city bus, trolley or subway?</p> <p>Do you miss hiking, traveling, meeting other people, relatives, friends?</p>
	<p>What do you do during an air raid?</p> <p>Who among you doesn't have a shelter nearby?</p> <p>And if there is a shelter and you don't go there, why?</p> <p>What else did you find particularly disturbing during the war?</p> <p>What else about the lives of people with disabilities would you like to tell the UN staff?</p>

Card of the discussion participant	
First and last name	
Girl or boy	
Age.	
Name of the organization	
City or village	
Name of the city or village	



Annex 3 List of clusters and working groups.

Clusters⁵²⁰

1. Camp Coordination and Camp Management Cluster led by UNHCR (activated in March 2022)⁵²¹
2. Education Cluster co-led by UNICEF and Save the Children⁵²²
3. Emergency Telecommunications Cluster led by WFP (newly activated in February 2022)⁵²³
4. Food Security and Livelihoods Cluster co-led by FAO and WFP
5. Health Cluster led by WHO⁵²⁴
 - Mental Health and Psychosocial Support Technical Working Group⁵²⁵, Trauma and Rehabilitation Technical Working Group⁵²⁶, Health Logistics & Supply Task Team⁵²⁷, Risk Communication and Community Engagement (RCCE)⁵²⁸, Sexual and Reproductive Health Technical Working Group⁵²⁹, Assessment & Analysis TWG⁵³⁰
6. Logistics Cluster led by WFP (newly activated in February 2022)⁵³¹
7. Protection Cluster led by UNHCR⁵³²
 - Child Protection⁵³³, Gender Based Violence⁵³⁴, Mine Action⁵³⁵
8. Shelter and Non-Food Items Cluster led by UNHCR⁵³⁶
9. Water, Sanitation and Hygiene (WASH) led by UNICEF⁵³⁷

Working Groups

- Cash Working Group co-led by OCHA, IOM and URCS⁵³⁸
- Accountability to the Affected Populations⁵³⁹
- Age and Disability Technical Working Group⁵⁴⁰
- Assessment and Analysis Working Group (AAWG)⁵⁴¹
- Gender in Humanitarian Action Working Group (GiHA WG)⁵⁴²
- Housing, Land and Property Technical Working Group⁵⁴³
- Humanitarian Access Working Group⁵⁴⁴
- Information Management Working Group (IMWG)⁵⁴⁵
- LGBTIQ + Communities Technical Working Group⁵⁴⁶
- Protection from Sexual Exploitation and Abuse (PSEA) Network⁵⁴⁷
- Mental Health and Psychosocial Support Technical Working Group⁵⁴⁸

520. <https://response.reliefweb.int/ukraine/inter-cluster-coordination>

521. <https://www.cccmcluster.org/where-we-work/ukraine>

522. <https://response.reliefweb.int/ukraine/education>

523. <https://www.etcluster.org/countries/ukraine>

524. <https://response.reliefweb.int/ukraine/health>

525. <https://response.reliefweb.int/ukraine/mental-health-and-psychosocial-support-technical-working-group>

526. <https://response.reliefweb.int/ukraine/trauma-and-rehabilitation-technical-working-group>

527. <https://response.reliefweb.int/ukraine/health/ukraine-health-logistics-supply-technical-working-group>

528. <https://response.reliefweb.int/ukraine/health/ukraine-risk-communication-and-community-engagement-rcce>

529. <https://response.reliefweb.int/ukraine/sexual-reproductive-maternal-and-child-health-working-group>

530. <https://response.reliefweb.int/ukraine/health/ukraine-assessment-analysis-twg>

531. <https://logcluster.org/en/ops/ukr22a>

532. <https://response.reliefweb.int/ukraine/protection>

533. <https://response.reliefweb.int/ukraine/child-protection>

534. <https://response.reliefweb.int/ukraine/gender-based-violence>

535. <https://response.reliefweb.int/ukraine/mine-action>

536. <https://sheltercluster.org/response/ukraine>

537. <https://response.reliefweb.int/ukraine/water-sanitation-and-hygiene>

538. <https://response.reliefweb.int/ukraine/cash-working-group-cwg>

539. <https://response.reliefweb.int/ukraine/accountability-affected-population>

540. <https://response.reliefweb.int/ukraine/age-and-disability-technical-working-group>

541. <https://response.reliefweb.int/ukraine/assessment-and-analysis-working-group-aawg>

542. <https://response.reliefweb.int/ukraine/gender-humanitarian-action-sub-group>

543. <https://response.reliefweb.int/ukraine/housing-land-and-property-working-group>

544. <https://response.reliefweb.int/ukraine/humanitarian-access-working-group>

545. <https://response.reliefweb.int/ukraine/information-management-working-group-imwg>

546. <https://response.reliefweb.int/ukraine/lgbtiq-plus-working-group>

547. <https://response.reliefweb.int/ukraine/protection-sexual-exploitation-and-abuse>

548. <https://response.reliefweb.int/ukraine/mental-health-and-psychosocial-support-technical-working-group>



Annex 4: Examples of lawsuits and claims

1. a lawsuit regarding the inability to purchase discounted tickets through the website of Ukrzaliznytsia and the inaccessibility of the site for the blind; regarding the inaccessibility of pharmacies for people with disabilities; regarding the inability to purchase insurance for traveling abroad; regarding the inaccessibility of a nightclub and the denial of household loans for a person with a disability⁵⁴⁹
2. claim of a deputy of the village council, who uses a wheelchair and could not get to the meeting of the village council on the third floor, which is inaccessible to him. In its 2020 decision, the court, in particular, noted that the use of available accessible premises to ensure the plaintiff's participation in council meetings would be a reasonable accommodation within the meaning of the Convention on the Rights of Persons with Disabilities⁵⁵⁰ lawsuit filed by a visually impaired person who was unable to vote independently in the 2020 elections due to the fact that the Central Election Commission of Ukraine did not approve a list of reasonable accommodations for the possibility of independent voting is still at the stage of cassation consideration. However, in the first and appellate courts, the plaintiff's claim was partially satisfied. In particular, the court of first instance noted that the CEC had not ensured: "the right to vote, by secret ballot".⁵⁵¹

Annex 5: list of laws that apply to physical environment in Ukraine.

1. Law of Ukraine "On the Fundamentals of Social Protection of Persons with Disabilities in Ukraine" dated 21.03.1991 No. 875-XII⁵⁵²
2. Law of Ukraine "On Regulation of Urban Development" dated 17.02.2011 No. 3038-VI⁵⁵³
3. Law of Ukraine "On Improvement of Settlements" dated 06.09.2005 No. 2807-IV⁵⁵⁴
4. Resolution of the Cabinet of Ministers of Ukraine "On Approval of the Procedure for Monitoring and Assessing the Degree of Accessibility of Physical Environment Facilities and Services for Persons with Disabilities" No. 537 dated May 26, 2021.
5. Resolution of the Cabinet of Ministers of Ukraine "On Approval of the Procedure for Inspection of Construction Objects Put into Operation" dated 23.05.2011 No. 553⁵⁵⁵.
6. Resolution of the Cabinet of Ministers of Ukraine "On Approval of the Procedure for State Architectural and Construction Control" dated 23.05.2011 No. 553⁵⁵⁶
7. Joint Order of the Ministry of Construction, Architecture and Housing and Communal Services of Ukraine and the Ministry of Labor and Social Policy of Ukraine "On Approval of the Model Regulation on Committees for Ensuring the Accessibility of Disabled Persons and Other Low-Mobility Groups of the Population to Social and Engineering and Transport Infrastructure Facilities" dated 08.09.2006 No. 300/339⁵⁵⁷
8. DBN V.2.3-5:2018 "Streets and roads of settlements"⁵⁵⁸

549.

550.

551.

552. <https://jagan.radha.gov.ua/las/show/875-12>

553. <https://jagan.radha.gov.ua/las/show/3038-17#n12>

554. <https://jagan.radha.gov.ua/las/show/2807-15#text>

555. [HTTPS://jagan.Radha.Goa.UDA/Laws/Show/257-2017-%D0%PF](https://jagan.radha.gov.ua/las/show/257-2017-%D0%PF)

556. [HTTPS://jagan.Radha.Goa.UA/Laws/Show/553-2011-%D0%PF](https://jagan.Radha.Goa.UA/Laws/Show/553-2011-%D0%PF)

557. <https://jagan.radha.gov.ua/radha/show/v0300667-06#text>

558. <https://response.reliefweb.int/ukraine/gender-based-violence>

559. <https://dbn.co.ua/load/normative/dbn/1-1-0-199#load>



Annex 5a list of laws that apply to Transport

- 1. National Transport Strategy of Ukraine until 2030 “Drive Ukraine 2030”⁵⁶⁰
- 2. Law of Ukraine “On Amendments to the Law of Ukraine “On Road Traffic” Regarding the Organization of Traffic for Persons Moving in Wheelchairs” dated 3.12.2019 No. 309-IX ⁵⁶¹
- 3. Law of Ukraine “On Amendments to Certain Legislative Acts of Ukraine on Reforming the Sphere of Vehicle Parking” dated 21.12.2017 No. 2262-VIII ⁵⁶²
- 4. Resolution of the Cabinet of Ministers of Ukraine “On Amendments to the Procedure for Holding a Tender for the Transportation of Passengers on a Public Bus Route” dated January 3, 2023, No. 27⁵⁶³

Annex 6: list of laws that apply to Information & Communication

- 1. Law of Ukraine “On Public Media of Ukraine” No 1227-VII dd 17.04.2014, revision as of 02.10.2023⁵⁶⁴
- 2. Resolution of the Cabinet of Ministers of Ukraine “Some Issues of Accessibility of Information and Communication Systems and Documents in Electronic Form” dated July 21, 2023, No. 757⁵⁶⁵
- 3. DSTU EN 301 549:2022 (EN 301 549 V3.2.1 (2021-03), IDT) “Information technology. Requirements for the accessibility of ICT products and services”

Annex 7: detailed budget 2021

Ministry/ funding scheme	examples	UAH 2021 ⁵⁶⁶
Payment of benefits		20.2 billion UAH
Social protection	Fund for Social protection of Persons with disabilities under MoSP build from state budget and revenue of quota fines	2.2 billion UAH (fund: 2.3 billion UAH) 2023: 6.9 billion UAH ⁵⁶⁷
Provision of technical and other rehabilitation	1.5 billion UAH total	
	Functioning of state rehabilitation institutions	291 million UAH
	Provision of rehabilitation for children	162.9 million UAH
	provision of sanatorium-resort vouchers to persons with disabilities and compensations	107.3 million UAH
	financial support for public associations	86.1 million UAH
	purchase of cars for the transportation of persons with disabilities with specific needs	29.7 million UAH

560. Cabinet of Ministers of Ukraine, Order of May 30, 2018, No. 430-p On approval of the National Transport Strategy of Ukraine for the period up to 2030. Available at: <https://www.kmu.gov.ua/npas/pro-shvalennya-nacionalnoyi-transportnoyi-strategiyi-ukrayini-na-period-do-2030-roku>

561. <https://jagan.radha.gov.ua/loss/show/309-20#text>

562. <https://ips.ligazakon.net/document/T172262>

563. <https://jagan.radha.gov.ua/loss/show/27-2023-%d0%pf#text>

564. <https://jagan.radha.gov.ua/laws/show/1227-18#text>

565. <https://ips.ligazakon.net/document/KP230757?an=1>

566. Data for 2021 – according to reports on the implementation of passports of budget programs for 2021.

567. Zholnovych: The task is to ensure economic independence of people with disabilities <https://www.ukrinform.ua/rubric-society/3780599-zolnovic-zavdannazabezpeciti-ekonomichnu-samostijnist-ludej-z-invalidnistu.html>



Ministries of Veteran Affairs	1.1 billion UAH total	
	social protection in the area of provide one-time financial assistance to family members of persons who died while participating in the anti-terrorist operation	164.9 million UAH
	the payment of compensation for housing to persons with disabilities (groups I-II) as a result of the war; family members of the deceased; IDPs (recognized as combatants or persons with disabilities as a result of war of group III), persons with disabilities as a result of the war (group I-II) from among the participants in hostilities on the territory of other states and family members of the deceased (deceased)	894.7 million
Ministry of Youth and Sports	1.5 billion UAH total	
	programs for the development of sports among persons with disabilities and their physical culture and sports rehabilitation	0.8 million UAH
	preparation and participation of national teams in the Paralympic and Deaflympic Games	0.7 billion UAH
State Committee for Television and Radio Broadcasting	state scholarships to prominent figures in the information industry, children of journalists who died or who were diagnosed with a disability	1.8 million UAH
Ministry of health	No public data to indicate use for persons with disabilities	
Ministry of education	No public data to indicate use for persons with disabilities	

Annex 8: growth in disability-data based on MSEC identification

In 2022 (Jan-Dec.), 175,163 people were initially examined by the MSEC, of whom 145,243 were initially recognized as persons with disabilities:

- 55,028 women and 90,215 men;
- 34,157 people aged under 39 years inclusive,
- 76,734 people aged 40 to 60 years,
- 17,356 women aged 60 and older, 16,996 men aged 60 and older (total: 34,352 men and women 60+ years);
- 17,757 people with disabilities of group I,
- 53,526 people of group II, and
- 73,960 people of group III.

In 2023 (Jan-Dec.), 249,909 people were initially examined by the MSEC, of whom 230,685 people were initially recognized as persons with disabilities:

- including 92,580 women and 138,105 men;
- 50,168 people aged under 39 years inclusive,
- 105,803 people aged 40 to 60,
- 41,625 women aged 60 and older, 33,089 men aged 60 and older (total: 74,714 men and women 60+ years);
- 28,074 people with disabilities of group I,
- 95,474 people of group II, and
- 107,137 people of group III.⁵⁶⁸

The table⁵⁶⁹ below illustrates the growth in the number of people who were assessed the first time, indicating a yearly growth, while a significant increase of assessed and certified cases can be seen for 2023:

Year	# of people Group I certified	# of people Group II certified	# of people Group III certified	# of Children identified	# of people examined
2020	13.180	42.620	65.249	13.149	121.049
2021	17.757	53.526	73.960	15.311	145.243
2022	17.757	53.526	73.960	16.115	175.163
2023	28.074	95.474	107.137	N/A	249.909

Annex 9 Summary of UN consultation (11. November 2024, Kyiv/Ukraine)

Discussion

- Integrated services are needed to ensure continuation of care across a persons life-span, while this isnt like it is currently designed
 - o Increased mainstreaming of disability inclusion across sectors and services
 - o Ensure services are comprehensive, e.g. daycare is a key area to be implemented when supporting parents
- Stigma as well as self-stigmatisation of persons with disabilities persists which is reflected in current language used
 - o Updating legislation according to rights-based language as well as continue awareness raising campaign(s)
- Participation and involvement of OPDs at national level can be seen, while the reorganization of ministries poses an extra challenge to ensure continuity of processes started
 - o Anchor participation more formally into the system
- Lack of funding towards community services and CSOs and increased risk of institutionalization due to evacuation
 - o Support costing analysis at community, regional and national level to support advocacy around ‘costing of deinstitutionalization’
 - o Support capacity initiative at local level in close coordination with national initiatives
 - o Ensure disability-inclusive budgeting across programs and report accordingly

568. Information provided by FFR upon request.

569. Data are taken from the State Statistics Service's collection ‘Social Protection of the Population’ and data provided by the Ministry of Health at the request of FFR.



- Started progress around legal capacity and guardianship stopped due to the war
 - Restart process and enhance access to legal system (Art. 12)
- Lack of knowledge and awareness across agencies as well as lack of trained staff
 - Enhance mainstreaming across services implemented and enhance staff capacities
 - Enhance internal procedures to adhere to accessibility and UNCRPD
 - Enhance guidance around inclusive communication
 - establish clear responsibilities to implement UN disability strategy and coordinated across agencies to foster coordination and peer-to-peer support
- lack of coordination among UN agencies and only partly meaningful participation of OPDs
 - Effective existing mechanisms, such as ADTWG, should be leveraged to enhance OPD voices
 - disability focal points for mainstreaming across agencies and clusters are needed to enhance mainstreaming and coordination
- national level reforms need to be in line with UNCRPD
 - continue monitoring of reforms and implementation to support actionable legislation aligned with the UNCRPD
- Lack of data collected including children with disabilities in institutional care facilities
 - Support updating and enhancing data collection systems at ministry level and ensure within evacuation procedures people with disabilities and vulnerable groups are not left behind
 - UN to continue collaborating with the Ministry of Social Policy (MOSP) to integrate education and disability data for better planning
- Lack of trained staff at community level
 - Support re-training initiatives (e.g. teachers, assistant teachers) and identify qualified workforce at community level to ensure quality services and education
- Lack of accessible information
 - Learn from successful initiatives like Inclusion Ukraine and ensure consultation of individuals with intellectual disabilities in accessible language
 - Advocate for accessible information across UN programs and initiatives

Key Recommendations

1. Support accessibility and barrier-free in the recovery and beyond
 - a) Enhance access to assistive technology in education
 - b) Support Barrier-free environment at collective sites
 - c) Enhance targeted support and participation of persons with disabilities in the humanitarian response
2. Focus on deinstitutionalisation and enhance access to community services
 - a) Continue awareness raising at local level and support to protection service provision
 - b) Monitor rights and access to justice of persons with disabilities, including prisoners with disabilities
 - c) Strengthen community health services including rehabilitation
 - d) Better care flagship program for children
 - e) Support MoSP DI policy at national level including pilot projects
3. Promote inclusive employment and higher education access as well as overall mainstreaming.
 - a) Training on CRPD compliant budgeting
 - b) Support meaningful participation of OPDs
4. UN entities must reflect disability-inclusion within their own organizations



What recommendations would be the priority?



Figure 2: Ranking of recommendation by participants during the session, November 2024.

Annex 10: Summary of GoU consultations (October – November 2024, Kyiv/Ukraine)

1. Across ministries that participated key **reforms and renewal of action plans** under way have been highlighted, such as:
 - assessment system for persons with disabilities and MSEK reform and increased and simplified access to assistive technology,
 - ensuring safe evacuations including persons with disabilities and making information accessible and available for affected population during evacuation procedures,
 - promoting supported living opportunities and raising awareness around increased risks of institutionalization during the war,
 - enhance economic inclusion through new initiatives and allocating funding for services like day care and inclusive education,
 - shifting away from a benefit system and implementing a single support mechanism, etc.
2. Within the discussions (3 meetings) it has been highlighted that due to the war certain **process slowed down, funding challenges increased and monitoring efforts complicated**. Certain processes. e.g. inspection during construction of public infrastructure, are difficult to monitor during the war, while overall a challenge around data collection has been raised, having different systems and requirements in place across sectors.
3. As **responsibilities are divided across ministries**, while strategies and action plans may be under one council/ministry, an increased ownership of implementing areas of responsibilities and reporting accordingly at different ministries has been highlighted. Especially ensuring a coherence across different initiatives at national, regional and local level has been raised as challenges, while a **lack of awareness** or knowledge around CRPD, accessibility or CRPD budgeting **at local level remain high**, while recognizing current challenges at local level. Pilots, peer-to-peer learning and initiatives need to strengthen this level, including continuous awareness raising campaigns. The role of the MoSP as ‘lead coordinator’ of the UNCRPD implementation has been highlighted and could be strengthened.



4. Accessibility at vocational training sites or **inclusive secondary education** (e.g. universities) has been raised as an issue, including inclusive lifelong learning opportunities remaining a gap. Generally and in the light of the war leading to an increased number of people with disabilities above 18 years upskilling and re-training is a key requirement to ensure economic inclusion for veterans with disabilities and civilians with disabilities due to the war. The area of inclusive employment including the current draft law that aims at enhancing access for persons with disabilities has been raised as key requirement to ensure adherence to UNCPRD.
5. Human-rights issues **within institutional care facilities** have been raised, including lack of accessibility, limited adherence to individual rehabilitation plans as well as an overall lack of legal protection of residents. The Ombudsman office is monitoring the rights of people residing in these facilities, and regularly providing recommendations and reports, while a limited access to social protection scheme or justice has been highlighted, further limiting a persons option 'freely deciding' where to life.
6. Regarding **non-discrimination** it has been highlighted that persons with disabilities reported a lack of accessibility during humanitarian aid provision, limited accessibility of infrastructure and a general lack of an accessible environments preventing them participating in decision-making processes.

