

Since 2014, the issue of internal displacement in Ukraine has become not only a humanitarian challenge but also a permanent component of state policy. In 2022, this issue has only intensified with the full-scale war. Over more than ten years, important initiatives aimed at improving the situation of internally displaced persons (hereinafter referred to as IDPs) have been implemented: recognition of IDPs' electoral rights (Law No. 703), the possibility of registering a place of residence, educational benefits for young people from temporarily occupied territories, the formation of a separate specialized ministry, the launch of a state strategy on IDPs, as well as attempts to digitize access to pensions, services, and certificates, etc. At the same time, there is still no systematic and coordinated work by state bodies on internal displacement and temporarily occupied territories. The policy on IDPs in Ukraine today looks like a set of isolated initiatives that are often not implemented or are not coordinated with each other. In practice, the body responsible for coordination is not active enough, and there are no basic mechanisms for accountability, information exchange. performance evaluation. As a result, communities are faced with fragmented decisions, compensating for a lack of experience with intuition, and state strategies lack enforcement power.

In 2025, against the backdrop of reduced international aid, the relaunch of ministerial powers, and the completion of the current Strategy (2023–2025), it will be critically important to form a common position among the public sector and local experts: what exactly needs to be changed in the policy on IDPs so that it truly responds to systemic challenges. This document is based on two expert focus groups—with national and local public figures—and summarizes the key challenges and advocacy areas that, according to the participants, should be at the center of the political agenda on IDPs.

1. The actual absence of a coordination center and the weakening of institutional capacity in the field of IDP support

In 2024, the powers of the Ministry for Reintegration of Temporarily Occupied Territories were redistributed among other ministries. However, this transition was not accompanied by adequate institutional support, including personnel expertise, communication strategy, and coordination functions. With regard to IDP-related issues, the Ministry of Community and Territorial Development of Ukraine did not take over the coordination mechanisms that previously existed under the Ministry of Reintegration of Temporarily Occupied Territories of Ukraine and does not participate in existing interagency coordination mechanisms, nor does it provide political or methodological leadership in the field of IDPs. Indeed, experts note a noticeable loss of institutional memory in the public sector in the field of IDPs and TOTs — new appointments in central bodies are not accompanied by the transfer of best practices, archives, or strategic vision, which leads to the repetition of previous mistakes, duplication of efforts, and lost opportunities.

Recommendations to the Ministry of Community and Territorial Development of Ukraine

- Initiate amendments to the Resolution of the Cabinet of Ministers of Ukraine No. 330 of April 18, 2023, lead and resume the activities of the Coordination Headquarters for Ensuring the Rights and Freedoms of Internally Displaced Persons.
- Ensure the involvement of central government agencies, regional state administrations, national and international non-governmental organizations, the Protection Cluster, heads of IDP councils at regional state administrations, and other interested parties involved in the protection of the rights of IDPs and affected populations in the Coordination Center for the Management of Regions where hostilities are (were) taking place or which are temporarily occupied by the Russian Federation.

- Implement a communication plan and ensure the conduct of information campaigns targeting the general public, internally displaced persons, persons residing in the temporarily occupied territories of Ukraine and in areas of military operations, and persons who have left the country.
- Ensure the formation and implementation of state policy on the preparation and implementation of transitional justice principles and measures, as well as the submission to the Government for consideration of a draft act on introducing relevant amendments to the Regulations on the Ministry of Community and Territorial Development of Ukraine, approved by Resolution of the Cabinet of Ministers of Ukraine No. 460 of June 30, 2015.
- Ensure the sustained institutional participation of civil society, local authorities, and IDP councils in all stages of the political process—from the development of strategic documents to the assessment of their implementation.

2. The gap between policy formulation and implementation

Most of the regulatory acts governing IDP support, including Ukrainian laws, Cabinet of Ministers resolutions, and subordinate acts, are too general in nature and do not provide for sufficiently flexible or practical mechanisms for implementation at the local level. As a result, policies that are positioned as systemic solutions at the central government level often remain irrelevant or ineffective in communities (as an example, local experts cited Resolution No. 1225 of the Cabinet of Ministers of October 25, 2024, on subsidies for housing rental for IDPs). In addition, some communities lack methodological recommendations, resources, and communication regarding the introduction of new solutions, which further complicates even sincere attempts to implement policies.

Recommendations to the Cabinet of Ministers of Ukraine and central executive authorities

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- Ensure a full cycle of implementation of state programs in the field of IDP support, which includes:
 - development taking into account regional characteristics;
 - · piloting in typical communities;
 - creation of mechanisms for operational feedback from implementers and participants in state programs;
 - · adaptation based on evaluation results;
 - · scaling up after proven effectiveness.
- Institutionalize the practice of developing detailed instructions and recommendations for local authorities on the implementation of new national regulations at the local level.
- Ensure the creation of accessible communication channels for communities NGOs provide feedback the and to implementation of government well programs, as as mechanisms that will allow this information to be taken into account at the central level in the process of reviewing decisions or scaling up best practices, in accordance with the principles of accessibility, inclusiveness, and the ability of policies to adapt to the diverse and changing needs of the displaced population.

Recommendations for NGOs, research centers, and international organizations

- Actively participate in monitoring and evaluating the implementation of state programs in the field of IDP support, forming partnerships and constructive cooperation with central government bodies and local authorities. It is important to ensure:
 - independent analysis of the effectiveness of state instruments for supporting IDPs;

- methodological support for collecting feedback from communities;
- expert participation in the finalization of regulatory acts and pilot programs.
- Promote greater transparency in government programs by publicly reporting on their implementation, especially in cases where government agencies fail to provide adequate reporting.

3. Disproportionate responsibility of local authorities for implementing IDP policies

Local authorities are effectively implementing most of the state policy on IDPs without having sufficient powers or resources to do so. The biggest gaps are in housing, employment, and support for vulnerable groups, which are implemented without systematic mechanisms and adequate compensation from the state. Additionally, from the perspective of local self-government bodies, the situation is complicated by demotivation due to the reduction of financial autonomy of communities, in particular through the redistribution of personal income tax to the state budget. After Law of Ukraine No. 3703-IX came into force in January 2025, internally displaced persons were officially recognized as residents of the communities where they actually lived, which gave them the right to self-government. However, participate fully in local communities, this provision was interpreted as a signal to terminate targeted IDP support programs, as formal equality of rights became the basis for curtailing special measures. This approach ignores the structural vulnerability of IDPs, especially in terms of housing, income, and access to basic services. In fact, communities were left alone to deal with the needs of displaced persons, without a clear state policy, financial support, or methodological recommendations.

Recommendations to the Cabinet of Ministers of Ukraine and the Ministry of Community and Territorial Development of Ukraine

- Officially articulate the implications of Law No. 3703-IX for local policy, in particular that formal recognition of IDPs as community residents does not eliminate the need for special support and integration measures.
- In the process of implementing Law No. 3703-IX, initiate an audit and review of existing local policies for their inclusiveness for IDPs with subsequent revision of the regulatory framework or instructions if these groups are not taken into account, and reporting on the changes implemented.

4. Weak national system for recording IDPs and their needs

Ukraine still lacks a stable and updated IDP registration system that would allow for accurate assessment of the number, place of residence, and basic characteristics and needs of displaced persons. This poses significant challenges for policy planning, assessment of the burden on communities, and the necessary forms of assistance. Despite the existence of an approved methodology for assessing the needs of IDPs, in practice it is either not applied or used sporadically and without proper analytical support due to a lack of control by state authorities.

Recommendations to the Ministry of Social Policy of Ukraine, the Ministry of Community and Territorial Development of Ukraine, and the Cabinet of Ministers of Ukraine

Develop and implement an integrated digital IDP accounting system that includes basic demographic indicators, geography of location, and mobility dynamics, with the ability to update data based on profiling or needs assessment.

- 2 Ensure full implementation of the approved IDP Needs Assessment Methodology by monitoring and providing guidance and support during data collection and analysis, summarizing results at the national level, and incorporating them into strategic documents.
- Raise at the interagency level the issue of the role and capacity of the State Statistics Service in wartime, particularly with regard to the registration of displaced persons, and, if necessary, provide for institutional restructuring or integration with other data collection mechanisms.
- Ensure the technical capability to select reasons for deregistration via the mobile application of the Diya Portal.

5. Lack of effective coordination and evaluation of aid delivery systems on the ground

Despite the existence of nationwide coordination mechanisms, including interagency groups and humanitarian clusters, there is a low level of synchronization between the main aid providers—local authorities, humanitarian missions, international organizations, and local NGOs—at the level of individual communities and regions. The lack of information exchange on the scope, formats, and plans for support leads to duplication, fragmentation, and inefficient use of resources. Focus group participants cited examples of temporary housing facilities built with donor support that were never put into operation due to a lack of political will at the local level. There were also cases where individual aid recipients deliberately moved between communities in order to take advantage of humanitarian programs multiple times. Meanwhile, some vulnerable households remained outside the scope of support.

Recommendations to the Ministry of Community and Territorial Development of Ukraine, the Ministry of Social Policy, and regional military administrations



To consider amendments to Resolution No. 470 of the Cabinet of Ministers of Ukraine dated May 9, 2023, "On Coordination Centers for Civilian Support,,, which would designate the Ministry of Development as responsible for methodological support and coordination of the activities of the relevant centers.

6. Unclear mandate of relocated military administrations and local self-government bodies and loss of expert capacity

After relocation to government-controlled territories, a number of military administrations continue to operate with full access to budget allocation, without a clear mandate for their activities. Their functions need to be clarified in view of the risks of duplication of powers: who exactly they represent in the new circumstances and what functions they should perform outside their original jurisdiction. Of particular concern is the loss of professional capacity of relocated military administrations and local self-government bodies, especially in terms of narrowly specialized personnel, such as employees of administrative service centers, urban planning specialists, administrative functions, etc. In addition, in many cases, it is these structures that retain unique expertise from the experience of the eastern regions since 2014 - in particular, in working with the public sector, mobilizing initiatives, and coordinating with donors. Their isolation and underutilization in communities in government-controlled territories is a loss of potential that is currently critically needed in the context of a personnel shortage, especially in matters of recovery and integration policy at the local level.

Recommendations to the Cabinet of Ministers of Ukraine and the Ministry of Community and Territorial Development of Ukraine



In order to ensure access for IDPs from territories that are currently under full temporary occupation, establish a single center for regions, districts, and communities with the ability to review staffing tables and budgetary financing in accordance with actual powers.

- 2 Define state policy on the relocation of the CAA, including possible scenarios for coordination with local authorities, joint planning, or the transfer of powers.
- Ensure mechanisms for attracting inactive narrow-profile personnel from relocated administrations into community systems in controlled territories, especially in areas where there is a critical shortage of personnel.

7. From containment to economic integration: the need for differentiated policies towards PTR

Temporary accommodation centers remain an important element of the humanitarian response to internal displacement. However, their functioning is still limited mainly to providing basic support, without a proper strategic focus on development. Firstly, although CMU Resolution No. 930 defines minimum standards for temporary accommodation, experts still note that conditions in officially designated TAs do not meet these standards, and that there are unofficial TAs where monitoring mechanisms do not work at all. Second, as the results of focus group discussions have shown, for residents of temporary accommodation facilities, the current system lacks effective "social ladders,, and mechanisms to encourage participation in retraining or employment programs that would allow such people to gradually transition to a more autonomous life. During the discussions, the idea of introducing a case management approach to MTP residents was repeatedly raised, in the form of developing individual integration plans for each family, including employment, business support, retraining, and targeted social support. It was also suggested that the length of stay in temporary accommodation centres should be properly monitored and reviewed. The transition to a differentiated model of assistance is not only a way to allocate resources more efficiently, but also the key to the sustainable integration and development of IDPs in communities.

At the same time, there is a general lack of systematic government decisions focused on the labor market, except for some policies that are still ineffective at the local level.

From containment to economic integration: the need for differentiated policies towards residents of temporary settlements

As an example, participants in the discussion cited Resolution No. 331 of the Cabinet of Ministers of Ukraine dated March 7, 2023, which provided for compensation to employers for hiring IDPs for a period of at least three months. Unfortunately, in a number of communities, this initiative did not work due to the short-term nature of the incentives, which did not meet the needs of businesses.

At the same time, there is a general lack of systematic government decisions focused on the labor market, except for some policies that are still ineffective at the local level.

Recommendations to the Ministry of Economy of Ukraine

- Include the issue of economic integration of internally displaced persons in the new Employment Strategy, highlighting approaches for different groups of IDPs (in particular, residents of temporary accommodation centers who have the potential for employment).
- Promote the development of social entrepreneurship with the aim of supporting the economic capacity of vulnerable groups, including IDPs.

Recommendations to the Ministry of Community and Territorial Development of Ukraine, the Ministry of Social Policy, and the State Employment Service

- Develop state programs to promote economic independence among working-age IDPs living in temporary accommodation centers, including social support tools, access to education, retraining, and employment, taking into account the local context.
- Improve the quality and consistency of existing monitoring of living conditions in temporary accommodation for IDPs in particular, amend CMU Resolution No. 930 and expand coverage to informal locations.

Improve assessment criteria, ensure regular data collection and use of results to target support to the most vulnerable categories.

Ensure coordination of PTR activities at the national level, approval of the list of PTRs, regular updating of this list, in particular for the purpose of accommodating evacuated civilians, bringing PTSs into compliance with minimum standards, and developing a strategy for leaving (resettling) PTRs (CMU Resolution No. 930).

8. Systemic vulnerability of persons from temporarily occupied territories: the need to adapt policies to real conditions

People from temporarily occupied territories face unique challenges that state policy has yet to address systematically. In terms of public services, compensation mechanisms, and access to social rights, these groups find themselves in a state of legal and procedural uncertainty. The inability to document key life events (birth, death), confirm work experience or property ownership, as well as limited access to compensation for property in the occupied territory, creates a sense of discrimination and isolation. Young people from TOT who wish to evacuate to government-controlled territories require special attention. These young people not only lack safe access to the Ukrainian education program, but also often lack social capital or support in governmentcontrolled territories. Admission benefits remain insufficient in the context of deeper isolation, educational gaps, and psychological pressure. In wartime, the state must not only preserve equality of rights, but also create conditions for compensatory support for those who find themselves in the most unfavorable circumstances through no fault of their own.

Recommendations to the Cabinet of Ministers of Ukraine, the Ministry of Justice, the Ministry of Social Policy, the Pension Fund of Ukraine, and the Ministry of Education and Science

- Simplification of civil status registration procedures: Ensure the possibility of recognizing births and deaths that occurred in the temporarily occupied territories with a minimum set of alternative evidence through a simplified procedure for establishing facts in an administrative manner.
- 2 Ensure regular updating of the list of territories where combat operations are (were) conducted or temporarily occupied by the Russian Federation (Order No. 376 of 28 February 2025).
- Restore the mechanisms (provided for by Resolution of the Cabinet of Ministers of Ukraine No. 637 of August 12, 1993) for confirming the length of service for persons with TOT who cannot obtain relevant certificates from their place of work through testimony, available employment record books, enterprise archives, or alternative documents.
- Ensure the implementation of a protocol for inter-sectoral cooperation during the preparation, organization, and implementation of mass movements of persons in the event of armed conflict, in particular, mandatory evacuation.
- Accounting for property in the temporarily occupied territories: Provide for a separate procedure for accounting for property in the temporarily occupied territories, regardless of whether it has been damaged or destroyed, with a view to including such information in compensation mechanisms. At the same time, ensure government communication regarding the real possibilities, scope of responsibility, limitations, and phased nature of such compensation.

- Support for young people from TOT: Develop a national reintegration program to support young people from TOT, which would include: mentoring and social support during admission to the controlled territory, access to preparatory courses, housing solutions, and the creation of a safe educational environment that takes into account the specific context of this category.
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- 8 Ensure the implementation of a mechanism for recognizing the educational achievements of persons who lived in the temporarily occupied territories of Ukraine at the levels of complete general secondary education, vocational (vocational-technical) education, pre-higher professional education, and higher education, in accordance with the Law of Ukraine " On Amendments to Certain Laws of Ukraine Regarding the Recognition of Learning Outcomes of Persons Who Resided in the Temporarily Occupied Territory of Ukraine."
- Ensure the continuation of the pilot project on issuing temporary Ukrainian citizenship certificates to Ukrainian citizens residing in territories where hostilities are ongoing or which are temporarily occupied by the Russian Federation.

9. Problems of accounting for housing stock for the needs of IDPs

Despite the existence of regulatory mechanisms, in particular CMU Resolution No. 495, which regulates the procedure for providing temporary housing for IDPs, the process of forming housing funds for temporary accommodation of IDPs in communities remains fragmented, incomplete, and irregular. There is no functioning inventory system in place at the local level.

In some cases, the lists of housing stock objects formed by local authorities mainly include properties that are unfit for habitation, while housing that could potentially be used is not declared – due to local authorities' concerns about future financial burdens, unwillingness to use such premises for specific purposes, or a formal lack of authority when the housing is under the jurisdiction of higher administrative levels. All this creates an artificial perception of a lack of resources, even where housing is physically available. In addition, there are no clear technical instructions for local authorities on how to organize accounting, tools for assessing the condition of properties, or transparent mechanisms for financing repairs or compensation for the maintenance of housing transferred for temporary use by IDPs.

At the central level, the low level of formalized requests for temporary housing is also emphasized—according to national-level actors, communities hardly ever form queues to receive it.

Recommendations to the Cabinet of Ministers of Ukraine, the Ministry of Community and Territorial Development of Ukraine, and regional military administrations

- It is recommended to review Resolution No. 495 of the Cabinet of Ministers of Ukraine with a view to restoring fair access to temporary housing for all categories of vulnerable IDPs by reducing disparities in the points system and introducing separate quotas for socially vulnerable groups.
- Develop and approve a unified procedure for registering housing stock suitable for temporary accommodation of IDPs, with clear technical criteria for suitability, data requirements, mechanisms for regular updating, and official responsibility of communities for the completeness of the information provided.
- Introduce mandatory quarterly reporting by communities on the available housing stock, repair needs, occupancy, and use of provided housing—with the possibility of independent external verification, including with the participation of civil society organizations.



Require local authorities to publicly inform IDPs about available temporary housing options, including the procedure, list of documents, contacts of responsible persons, and up-to-date information about the housing stock, through accessible communication channels at the community level.

10. Institutionalization and standardization of the activities of the Councils of Higher Education Institutions

Councils on internally displaced persons (IDP Councils), established as consultative and advisory bodies representing IDPs in communities, currently operate in a highly heterogeneous manner. Their activity, composition, mandate, and capacity vary significantly depending on the community, and in some cases, they are completely absent. Based on the results of focus groups, there is a need for a nationwide review of the functioning of these councils, a review of their role at different administrative levels (community, district, region), and the formation of a national coordinating body or platform to ensure representation, standards, and joint advocacy.

Currently, there are no unified expectations for the activities of IDP councils, no systems for evaluating their effectiveness, and no approved mechanisms for internal interaction. This makes it impossible to institutionalize the councils and transform them into an effective instrument of influence. Special attention should be paid to regulating the status of relocated IDP councils, in particular, defining their mandate in host communities, their role in supporting or duplicating the functions of local councils, and the feasibility of their existence as a separate entity.

Recommendations to the Ministry of Communities and Territories Development of Ukraine with the support of the public sector of Ukraine



Establish a national coordinating mechanism for IDP Councils - a platform or organizational format that will ensure representation, exchange of experience, scaling up of best practices, advocacy at the national level and communication with central authorities.

- Clearly regulate the roles and powers of councils of different levels

 at the community, district and regional levels, and develop separate approaches to councils formed in relocated communities.
- Develop and implement a package of standard tools and templates for the functioning of the councils, including protocols, reporting forms, and document templates, to support and standardize their activities.
- Conduct an inventory of existing IDP councils to review their composition, reorganize inactive or duplicative entities, and formalize the status of those councils that function on a permanent basis.
- Amend the current regulatory framework, including the Model Regulation on IDP Councils, to include indicative criteria for the effectiveness of the councils' activities, which can serve not only for external evaluation, but also for self-analysis and internal development of the councils themselves. These criteria should also serve as a basis for renewing the composition or re-election of councils that do not fulfill their mandate.

11. IDP councils as full-fledged participants in local governance

Today, IDP councils have to perform a number of rather specialized functions that are key to protecting the rights of displaced persons on the ground, including representing interests, participating in decision-making, monitoring, and providing suggestions or recommendations. At the same time, their activities remain at the volunteer level, which significantly limits their sustainability and effectiveness. Participants of focus groups at the local level repeatedly emphasized that volunteerism does not equal systemic approach. The motivation to participate fades under the pressure of personal life circumstances, lack of remuneration, emotional burnout, and excessive workload.

Long-term and systematic implementation of complex tasks requires not only enthusiasm, but also constant involvement, skills and support. In this context, having at least one paid position within the council (e.g., a managerial or secretarial position) would ensure basic sustainability of the council, support for internal logistics and implementation of initiatives. In addition, it is important to develop the political autonomy of IDP councils and strengthen their role as an advisory and supervisory mechanism to local authorities. The state should not shift the responsibility for decision-making on IDPs to them, but rather create conditions for effective participation of displaced persons in local governance through formalized, influential mechanisms.

Recommendations to the Ministry of Communities and Territories Development of Ukraine

- 1 Envisage the possibility of at least one paid position in the IDP Council at the community level, for example, for a coordinator or secretary of the Council, to ensure organizational sustainability.
- Amend the Model Regulation on IDP Councils to provide for: the possibility of approval by the Council of certain decisions of local authorities in the field of IDP support; and mandatory involvement of the Council in consultations on the development of local programs, strategies or decisions related to IDPs.
- Develop and implement a state communication campaign that emphasizes the legitimacy, importance and practical value of IDP Councils as partners of local authorities and the state in implementing internal displacement policy.

Impact of funding cuts: critical gaps

Participants in focus groups at the local level noted that the most significant cuts were made in the following areas: organization of evacuation processes, support for temporary accommodation, response domestic and gender-based violence, and emergency cash assistance. Of particular concern was the situation of vulnerable groups, such as single mothers with young children and people of retirement age, who were often left without any means of subsistence in the first stages of displacement. Concerns were also expressed about the reduced availability of psychosocial assistance and free legal support. At the local level, it is not so much a lack of funding as a loss of faith in its availability in the future - there is a significant demotivation, uncertainty and poor understanding of where to look for resources. They emphasized that it is especially important to support and implement psychoemotional support projects. At the national level, there is a decrease in the involvement of experts due to reduced fees and fewer project vacancies, which limits the sector's ability to analyze and implement complex policies.

The document is based on the analysis of expert focus group interviews conducted by the International Renaissance Foundation in May 2025.

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