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Study Report

RAPID ASSESSMENT OF THE EXPERIENCE OF EVACUATING PEOPLE WITH DISABILITIES IN UKRAINE DUE TO THE WAR IN 2022



Rapid Assessment of the Experience of Evacuating People with Disabilities in Ukraine Due to the War: Study Report. UNDP Ukraine. 2022.

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Any opinions and conclusions presented in this report are those of the authors and do not necessarily coincide with the views of the UNPRPD or UN agencies implementing the Joint Programme “Mainstreaming gender-responsive disability inclusion in the humanitarian response in Ukraine.”

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Terms and Abbreviations

CRPD	UN Convention on the Rights of Persons with Disabilities
IDPs	internally displaced persons
IOM	International Organization for Migration
MCTD	Ministry for Communities and Territories Development of Ukraine
MFA	Ministry of Foreign Affairs
MIA	Ministry of Internal Affairs of Ukraine
Ministry for Reintegration	Ministry for Reintegration of the Temporarily Occupied Territories of Ukraine
Ministry of Social Policy	Ministry of Social Policy of Ukraine
NGO	non-governmental organisation
NSS	National Social Service of Ukraine
OCHA	UN Office for the Coordination of Humanitarian Affairs
OMA	oblast military administration
SES	State Emergency Service
UN	United Nations
UNDP	United Nations Development Programme
UNPRPD	United Nations Partnership on the Rights of Persons with Disabilities
VRU	Verkhovna Rada of Ukraine

Key terms and Definitions

Barriers are factors in a person's environment that hamper participation and create disability. For persons with disabilities, barriers limit access to and inclusion in society. They may be attitudinal, environmental, or institutional¹.

An internally displaced person is a citizen of Ukraine, a foreigner, or a stateless person who legally stays on the territory of Ukraine and has the right to permanent residence in Ukraine; and who was forced to leave a place of residence as the result of, or in order to avoid, the effects of armed conflict, temporary occupation, situations of generalised violence, mass violations of human rights, or natural or human-made disasters².

Discrimination on the basis of disability means any distinction, exclusion, or restriction on the basis of disability which has the purpose or effect of impairing or nullifying the recognition, enjoyment, or exercise, on an equal basis with others, of all human rights and fundamental freedoms in the political, economic, social, cultural, civil, or any other field. It includes all forms of discrimination, including denial of reasonable accommodation³. Discrimination on the basis of disability can target persons who currently have an impairment, who have had an impairment in the past, who have a predisposition to an impairment in the future, who are presumed to have an impairment, and to associates of a person with a disability. The latter is called **discrimination by association**.

Assistive products are external products (devices, equipment, instruments, software), specially produced or generally available, that maintain or improve an individual's functioning and independence, participation, or overall well-being⁴. They can also help prevent secondary impairments and health conditions. Examples of assistive products include wheelchairs, prostheses, hearing aids, visual aids, and specialised computer software and hardware that improve mobility, hearing, vision, or the capacity to communicate.

1 https://interagencystandingcommittee.org/system/files/2020-11/IASC%20Guidelines%20on%20the%20Inclusion%20of%20Persons%20with%20Disabilities%20in%20Humanitarian%20Action%2C%202019_0.pdf

2 According to Law of Ukraine No. 1706 of 20 October 2014 "On Ensuring of Rights and Freedoms of Internally Displaced Persons".

3 CRPD, Article 4.

4 World Health Organization (WHO), Guidelines on health-related rehabilitation, p. 35.

Accessibility is one of the eight principles that enable the rights affirmed in the CRPD to be interpreted. It includes the right of persons with disabilities to enjoy “access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas”⁵. Accessibility is a precondition of inclusion; in its absence, persons with disabilities cannot be included.

Evacuation means an organised withdrawal or removal of the population from an emergency area or an area of possible destruction when there is a threat to their life or health, as well as to tangible or cultural valuables being damaged or lost⁶.

Environmental barriers include physical obstacles in the natural or built environment that “prevent access and affect opportunities for participation”⁷, and inaccessible communication systems. The latter do not allow persons with disabilities to access information or knowledge and thereby restrict their opportunities to participate⁸. Lack of services or problems with service delivery are also environmental barriers^{9,10}.

Institutional barriers include laws, policies, strategies, or institutionalised practices that discriminate against persons with disabilities or prevent them from participating in society¹¹. Barriers may be classified as a threat if they are put in place intentionally. They are described as a vulnerability if their occurrence is inadvertent. In both cases, barriers lead to exclusion, making it likely that persons with disabilities will face more or worse threats and vulnerabilities than others affected by a crisis.

Disability inclusion is achieved when persons with disabilities meaningfully participate in all their diversity, when their rights are promoted, and when disability-related concerns are addressed in compliance with the CRPD¹².

5 CRPD, Article 9.

6 Civil Protection Code of Ukraine.

7 WHO and World Bank, World Report on Disability (2011), pp. 4 and 263.

8 Wapling and Downie, *Beyond Charity: a Donor’s Guide to Inclusion* (2012), p. 21; PPUA Penca (Center for Election Access of Citizens with Disabilities), *Accessible Elections for Persons with Disabilities in Five Southeast Asian countries*. USAID and AGENDA (2013), pp. 5, 11; WHO and World Bank, World Report on Disability (2011), p. 4.

9 WHO and World Bank, World Report on Disability (2011), p. 262.

10 GSDRC, *Barriers to Disability Inclusion*.

11 Wapling and Downie, *Beyond Charity: a Donor’s Guide to Inclusion* (2012), p. 21; DFID: *Disability, Poverty and Development* (2000), p. 8; WHO and World Bank, World Report on Disability (2011), p. 6, 262; Bruijn et al. (2012), *Count Me In: Include People with Disabilities in Development Projects* (2012), p. 23.

12 Website of the United Nations Disability Inclusion Strategy and UNDIS, Annex I. Key concepts and definitions.

It is related to the concept of ‘social inclusion’, which has been defined as “the process by which efforts are made to ensure equal opportunities — that everyone, regardless of their background, can achieve their full potential in life. Such efforts include policies and actions that promote equal access to (public) services as well as enable citizen’s participation in the decision-making processes that affect their lives¹³.”

Informed consent occurs when a person willingly agrees to do something or allow something (for example, participation in research, a medical intervention, relocation, the sharing of personal information, the transfer of case documents, etc.) based on full disclosure of the risks, benefits, alternatives, and consequences of refusal. Persons with disabilities, particularly those with intellectual and psychosocial impairments, are very often denied the right to express their consent. This is a violation of their rights under the CRPD¹⁴. Children are entitled to be consulted and to give their informed consent to the degree that their evolving capacities enable them to do so.

An emergency situation is a situation in a separate territory, an economic entity within it, or a water body that is characterised by the disruption of the population’s normal conditions of life or activity and is caused by a disaster, accident, fire, natural disaster, epidemic, epizootic, epiphytotic, use of destructive means, or other hazardous event that has resulted (or may result) in a threat to the life or health of the population, a large number of fatalities and casualties, significant material damage, and in the inability of the population to live in such a territory or facility or carry out economic activities therein¹⁵; subject to the origin of events that can cause an emergency situation in Ukraine, emergency situations can be classified as: 1) man-made; 2) natural; 3) social; and/or, 4) military.

Persons with disabilities include those who have long-term physical, mental, intellectual, or sensory impairments which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others¹⁶.

Reduced-mobility population groups are persons who have difficulty getting around on their own, obtaining services or necessary information, or directionally-challenged persons, namely persons with disabilities, persons with temporary health impairments, pregnant women, the elderly, and persons with baby carriages¹⁷.

13 UN Department of Economic and Social Affairs, Social Inclusion.

14 Committee on the Rights of Persons with Disabilities, General comment No. 1 (2014) on Article 12: Equal recognition before the law CRPD/C/GC/1, 19 May 2014. See also Committee on the Rights of Persons with Disabilities, General comment No. 6 (2018) on equality and non-discrimination, CRPD/C/GC/6, 26 April 2018, para. 66. The IASC Policy on Protection in Humanitarian Action states that information and data should not be disclosed in the absence of free and informed consent. See the section on definitions.

15 Civil Protection Code of Ukraine.

16 CRPD, Article 1.

17 Law of Ukraine No. 3038-VI of 17 February 2011 “On Regulation of Urban Planning Activities”.

Reasonable accommodation means necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise, on an equal basis with others, of all human rights and fundamental freedoms¹⁸.

Mainstreaming is the process of incorporating CRPD into protection principles, promoting the safety and dignity of persons with disabilities, and ensuring these persons have meaningful access to humanitarian support and can participate fully in humanitarian interventions. Mainstreaming does not focus on what is done, but on how it is done. Disability should be mainstreamed in all sectors and all phases of the humanitarian programme cycle.

Attitudinal barriers are negative attitudes that may be rooted in cultural or religious beliefs, hatred, unequal distribution of power, discrimination, prejudice, ignorance, stigma, and bias, among other reasons. Family members or people in a close network of persons with disabilities may also face ‘discrimination by association’. Attitudinal barriers are at the root of discrimination and exclusion.

Resilience describes the ability of a system, person, community, or society to resist, absorb, accommodate, adapt to, transform, and recover from the effects of a hazard in a timely and efficient way, including by preserving and restoring essential structures and functions through risk management.

Universal design means the design of products, environments, programmes, and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialised design. “Universal design” shall not exclude assistive devices for particular groups of persons with disabilities where this is needed¹⁹. The principles of universal design facilitate accessibility, including for persons with disabilities²⁰.

Civil protection means a set of actions taken in Ukraine in peacetime and during the special period in order to protect the population, territories, environment, property, and tangible and cultural valuables from emergency situations and other hazardous events; to prevent such situations and events, to eliminate their effects, to assist victims, and to carry out state supervision (control) in the field of fire and technological safety²¹.

18 CRPD, Article 2.

19 CRPD, Article 2.

20 National Disability Authority, What is Universal Design?

21 Civil Protection Code of Ukraine.

Introduction

Russia's military aggression against Ukraine launched on 24 February 2022 has resulted in unprecedented human losses, destruction, and displacement. According to the United Nations Office for the Coordination of Humanitarian Affairs (OCHA), the number of affected people in need of assistance as of October 2022 is 17.7 million, including more than six million people who have become internally displaced persons²², most of whom are now in the western regions of Ukraine.

Persons with disabilities are especially vulnerable since they might be unable to flee or stay in affected territories, which results in risk to their life, difficulty satisfying their daily needs, and limited access to humanitarian assistance. According to the International Organization for Migration (IOM), 23% of IDPs are persons with disabilities²³. Moreover, Ukraine has the highest level of institutionalising children and adults with disabilities in Europe, and most of them faced serious problems during their recent evacuation. Persons with disabilities might have more difficulty accessing humanitarian assistance and getting the protection they need during the humanitarian crisis in comparison with others. In order to prevent discrimination against persons with disabilities, humanitarian assistance during armed conflicts is based on the rules of humanitarian law, which provides for applying the principles of humanity, neutrality, impartiality, and independence set out in United Nations General Assembly resolutions.²⁴ These principles demand that organisations operating in the field of emergency assistance eliminate existing barriers to access humanitarian assistance, and guarantee that persons with disabilities will be included in all phases of humanitarian response²⁵.

“Mainstreaming gender-responsive disability inclusion in the humanitarian response in Ukraine” is a joint initiative between four UN agencies: UNDP, UN Women, United Nations Children’s Fund, and United Nations Population Fund; and is funded by the United Nations Partnership on the Rights of Persons with Disabilities (UNPRPD).

22 OCHA Report on Ukraine for October 2022. <https://reports.unocha.org/uk/country/ukraine>

23 Ukraine Internal Displacement Report. General Population Survey, Round 9, 26 September 2022. IOM. https://displacement.iom.int/sites/g/files/tmzbd1461/files/reports/IOM_Gen%20Pop%20Report_R9_IDP_FINAL_UKR%20version.pdf

24 On humanity, neutrality and impartiality, see General Assembly resolution 46/182 (1991). On independence, see General Assembly resolution 58/114 (2004).

25 Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action. Inter-Agency Standing Committee (IASC), 2019. https://interagencystandingcommittee.org/system/files/2020-11/IASC%20Guidelines%20on%20the%20Inclusion%20of%20Persons%20with%20Disabilities%20in%20Humanitarian%20Action%2C%202019_0.pdf

The purpose of this initiative is to ensure that urgent deployment of large-scale humanitarian assistance will be inclusive and gender-sensitive, and will fully consider the difficulties faced by persons with disabilities. The programme is aimed at furnishing immediate information to humanitarian assistance programmes in order to maintain a gender-sensitive approach and consider the direct needs of persons with disabilities. It does so by equipping humanitarian organisations, local authorities, and non-governmental organisations with inclusion tools and check lists; and by ensuring the rapid assessment of the current needs of women, men, girls, and boys with disabilities - all with a view of establishing efficient communication and protecting the most vulnerable social groups.

This rapid assessment was conducted in September and October 2022 in order to determine the main barriers to equal access of persons with disabilities to humanitarian assistance, in particular, in connection with evacuation assistance; and to develop efficient tools for all stakeholders dealing with evacuating persons with disabilities during the war in Ukraine.

SECTION 1.

Study Methodology

The **purpose** of this study is to examine the experience of the displacement/evacuation of persons with disabilities in Ukraine as a result of military actions in 2022; and to determine the major problems and barriers during evacuation faced by persons with disabilities during the war in Ukraine.

The following tasks of the study were set to achieve this **purpose**:

- ✓ Determine the list of key informants and survey interested partners who deal with and influence the introduction of an efficient system for evacuating persons with disabilities in Ukraine;
- ✓ Engage direct beneficiaries, i.e., persons with disabilities and/or their legal representatives, in the study, and conduct a rapid survey among them regarding the major problems and barriers during evacuation faced by persons with disabilities during the war in Ukraine;
- ✓ Give recommendations on improving evacuation processes for persons with disabilities in order to ensure equal access to services associated with the evacuation process for persons with disabilities in war-affected communities in Ukraine.

The rapid assessment methodology was based on the combined qualitative study and analysis of available data on ensuring the rights of persons with disabilities during evacuation caused by the war in Ukraine.

First, the following was analysed during a desk review: thirty-seven legal and normative acts on evacuating the population, in terms of considering the rights and interests of persons with visual, hearing, mobility, intellectual, and mental impairments. The legal and normative acts are listed in Annex 1.

The list of the legal and normative acts was made based on: the preliminary sampling analysis of legislation; the results of inquiries for public information submitted to the Ministry for Reintegration of the Temporarily Occupied Territories (Ministry for Reintegration) and the State Emergency Services (SES); and, the data obtained during semi-structured interviews with representatives of the central, regional, and local authorities, within the framework of the study.

In addition to analysing the existing legal and normative framework as a precondition for the actions of different stakeholders to ensure the quick and efficient evacuation of persons with disabilities, also analysed were the available studies conducted in Ukraine in this area, the key international recommendations in the humanitarian law and the experience of evacuating persons with disabilities in different countries.

Semi-structured, in-depth interviews were conducted with experts from national, regional, and local public and non-governmental sectors at different levels. Focused/group semi-structured interviews were held with representatives of organisations that provided services to persons with disabilities and had experience evacuating persons with disabilities from oblasts affected by the military actions. Interviews with persons with disabilities and/or their representatives who had been evacuated were also held. The interviews with the experts and persons with disabilities were held in different formats, including online and in-person meetings. Persons with disabilities who had difficulty participating in the group interview were offered a semi-structured survey in Google Forms.

STUDY STAGES

The data were collected and analysed from July to October 2022 in three stages.

1 STAGE During the **first assessment stage**, a desk review was conducted to analyse the existing legal and normative framework and the key international recommendations on the action algorithm for evacuating persons with disabilities during a state of emergency and martial law. The analysis was performed from 8 July to 16 September 2022. From the analysis, five key modules of themes connected with evacuating persons with disabilities were determined: 1. the existing evacuation system; 2. planning the evacuation of persons with disabilities in Ukraine / organising support for persons with disabilities during evacuation; 3. informing persons with disabilities; 4. evacuation and transportation routes for persons with disabilities; and, 5. accessibility of shelters / accommodation after evacuation. Then questionnaires to interview respondents were formulated based on the modules, and the data obtained were analysed.

Based on the findings, a list of key informants was made. It included representatives of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights, the Government Commissioner for the Rights of Persons with Disabilities, the SES, the Ministry for Reintegration, the Ministry of Social Policy; Donetsk, Luhansk, and Lviv OMA; representatives of the local councils who were members of the evacuation commissions for Kramatorsk and Sloviansk; representatives of non-governmental organisations and volunteers; organisations providing services to persons with disabilities, and persons with disabilities themselves. The list of the key informants can be found in Annex 2 hereto.

Survey tools were developed for the interview taking into account the special characteristics of the respondents from different organisations and agencies and from different levels (national, regional, or local).

The questionnaire for persons with disabilities and the questionnaire for focus group discussions were developed using Google Forms. Both questionnaires informed the participants of the purpose of the study and its main principles. The questionnaire for persons with disabilities who had been evacuated consisted of twenty-nine questions that covered the above-mentioned themed modules.

All the survey tools were tested and presented to the representatives of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights for discussion before use, during a Zoom meeting on 16 September 2022, and were modified to clarify the wording and to elicit clear answers from participants.

2 STAGE **The second assessment stage** was field collection of information. A survey of experts was conducted concurrently with a survey of persons with disabilities from 16 September to 7 October 2022. The respondents were selected based on the following criteria: experience evacuating persons with disabilities during martial law (which means that the respondent has organised an evacuation or has had his or her own experience of evacuation as a person with a disability or a representative of a person with a disability since 24 February 2022); aged 18+; and, provided informed consent to participate in the study.

The questionnaire in Google Forms was distributed by email to specific organisations working with persons with disabilities and on social media, in themed groups and in chats dedicated to evacuation in Telegram, Viber, WhatsApp etc. As a result, 223 persons with disabilities, or their representatives, who had an experience of evacuation during martial law in Ukraine were engaged into the Google survey.

Thirty-three respondents took part in the individual and group survey; in particular, seventeen representatives from executive authorities on the national and local level participated in five individual interviews and three group interviews. Moreover, four executive authorities responded in writing. Two focus group / semi-structured interviews were conducted for sixteen persons: with persons with disabilities and organisations that provided services to persons with disabilities and had experience evacuating persons with disabilities from the oblasts affected by the military actions. Ten telephone consultations were held with the heads of civil society organisations for persons with disabilities and their enterprises that provided services to persons with disabilities and participated in organising their evacuation. See Annex 2. List of Key Informants of the Study

The experts were mostly interviewed on online platforms, taking into account the most convenient time for the respondent and their Internet access.

It should be noted that the interviews/focus groups/Google surveys coincided with the period when the following was happening in Ukraine: martial law; regular (sometimes daily) shelling of settlements in Donetsk, Luhansk, Sumy, Kharkiv, Kherson, Chernihiv and other oblasts; mandatory evacuation from Donetsk Oblast, evacuation from de-occupied territories, testing of Cell Broadcast, a modern system for warning the public of threats for their life, by the State Emergency Service of Ukraine; reorganisation of the Ministry of Social Policy of Ukraine, reorganisation of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights, and the seasonal increase in COVID-19 incident rate. These circumstances made it extremely difficult to find the needed respondents, especially public officials (it was difficult to find competent public officials, and the interviews were constantly rescheduled). Nevertheless, all the planned surveys were conducted, and the research team received answers to the questions. The research team would like to express its gratitude to all the respondents for their time and participation in the interview.

3 STAGE The **final stage** included analysis and consolidation of study findings, and also developing the report and recommendations on how to better protect the rights of persons with disabilities during evacuation.

GEOGRAPHICAL COVERAGE OF THE STUDY

primary information was collected with the participation of representatives from public and local authorities, non-governmental organisations, and enterprises that provided services to persons with disabilities from five oblasts and one city: Lviv, Luhansk, Donetsk, Kharkiv, Dnipropetrovsk Oblasts, and city of Kyiv. Persons with disabilities who took part in the survey had been evacuated from twenty-one oblasts and one city: Vinnytsia, Volyn, Dnipropetrovsk, Donetsk, Zakarpattia, Zaporizhzhia, Ivano-Frankivsk, Kyiv, Kirovohrad, Luhansk, Lviv, Mykolaiv, Odesa, Poltava, Sumy, Kharkiv, Kherson, Khmelnytskyi, Cherkasy, Chernivtsi, Chernihiv, and the city of Kyiv.

Considering the restriction of movement and personal meetings due to martial law and military actions, the survey was conducted via online platforms (Google Analytics); the experts were interviewed in Zoom, Teams, WhatsApp, and Viber.

The assessment was conducted in compliance with ethical standards for sociological qualitative studies. The primary data were collected based on four principles: informed consent, confidentiality, anonymity, and voluntary participation.

STUDY LIMITATIONS

Persons with disabilities were selected for the Google Forms survey by distributing information among organisations that provided services to persons with disabilities; hence, the sampling is not representative. Researchers worked with respondents who had time and intention to give answers during the survey. Therefore, the data obtained cannot be extrapolated to all persons with disabilities in Ukraine.

The surveys in Google Forms had additional restrictions. People with vision and cognitive impairments had difficulty perceiving the information.

The surveys in interview form had additional restrictions. People with hearing and speaking, vision, and/or mobility impairments, self-care difficulties, and/or cognitive impairments had difficulty perceiving the information.

Combined approaches were used to address these difficulties: focus group discussions by means of Zoom and Google Form surveys. Moreover, it should be noted that persons with vision impairments used screen readers while completing Google Forms and participating in Zoom conferences.

SECTION 2.

Overview of the Key Principles for Evacuating Persons with Disabilities Within the International Programmes for Humanitarian Response and Legislation of Ukraine

2.1. EVACUATION OF PERSONS WITH DISABILITIES WITHIN THE INTERNATIONAL PROGRAMMES FOR HUMANITARIAN RESPONSE

According to the common global principles of impartiality in humanitarian assistance, it is prescribed by the international community that humanitarian assistance and the authorities of states affected by war and other humanitarian disasters must respond to the humanitarian crisis so that the needs of all affected people with no exceptions will be considered; and their fundamental rights during disaster conditions will be exercised to the maximum extent possible. This is the fundamental principle on which the Humanitarian Charter and Minimum Standards in Humanitarian Response are based²⁶.

Disability is not a determinant attribute of a person; if a person lives in an inclusive and comprehensively accommodated environment, limitations in his/her daily living do not have to result in incapacitation. Otherwise, persons with disabilities need additional services to improve their social integration. The need of persons with disabilities for such additional services is extremely high during war and other humanitarian disasters.

People with disabilities are a non-homogeneous group. They have different experiences; different cognitive, physical, and communication barriers to their participation and inclusion in the humanitarian area; and, different identities, namely age, sex, ethnic origin, place of residence, and race. Persons with disabilities face a higher level of marginalisation and discrimination due to the interconnection of these factors.

²⁶ Humanitarian Charter and Minimum Standards in Humanitarian Response. Sphere Edition. 2018 <https://spherestandards.org/wp-content/uploads/Sphere-Handbook-2018-EN.pdf> (in English). Sphere Edition 2011 is available in Ukrainian. <https://spherestandards.org/wp-content/uploads/Sphere-handbook-2011-Ukrainian-1.pdf>

For instance, children with disabilities are particularly vulnerable to cruel treatment and insufficient care during humanitarian disasters, while women with disabilities are at higher risk of sexual violence²⁷.

It is prescribed by Article 11 of the UN Convention on the Rights of Persons with Disabilities that State Parties shall take all necessary measures to ensure the protection and safety of persons with disabilities in situations of risk, including situations of armed conflict, humanitarian emergencies, and the occurrence of natural disasters.

According to analysis of available sources, international organisations have developed recommendations on organising humanitarian assistance so that the needs of persons with disabilities, namely during evacuation, will be considered.

The Minimum Standards for Age and Disability Inclusion in Humanitarian Action proposed by the Age and Disability Consortium define the fundamental principles for inclusion of persons with disabilities and older people affected by an emergency situation in humanitarian programmes. According to these standards, it shall be ensured that people with disabilities:

- 1.** are recognised to ensure they receive assistance that is appropriate **and relevant to their needs;**
- 2.** have access to the humanitarian assistance they need;
- 3.** are not negatively affected, and are more prepared, resilient and less at-risk as a result of humanitarian action;
- 4.** know their rights and entitlements, have access to information, and participate in decisions that affect them on an equal basis with others;
- 5.** have access to safe and responsive mechanisms to handle complaints on an equal basis with others;
- 6.** receive and participate in coordinated and complementary assistance on an equal basis with others;
- 7.** can expect improved assistance and inclusion as organisations providing humanitarian assistance learn from experience and reflection;
- 8.** receive assistance from competent and well-managed staff and volunteers who are skilled and equipped to include them in humanitarian responses, and have equal opportunities for employment and volunteering in humanitarian organisations.

27 UNICEF, Including children with disabilities in humanitarian action – General Guidance (2017).

These principles apply to all five clusters within which humanitarian support is provided, namely: 1) protection, water, sanitation, and hygiene; 2) food security and livelihoods; 3) nutrition; 4) shelter, settlement, and non-food items; 5) health and emergency education. The need to respect the principles of non-discrimination and inclusion is also emphasised in the Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action²⁸.

Evacuation of people affected by the war or other humanitarian crisis is part of a humanitarian crisis response, so these principles must be respected during evacuation of persons with disabilities.

The online tool Step-by-Step Practical Guidance on Inclusive Humanitarian Field Work²⁹ contains practical advice from numerous international humanitarian organisations on how to provide humanitarian assistance to persons with disabilities, inclusively and without discrimination. In particular, the section dedicated to evacuation pays attention to the need for comprehensive preparedness, which requires preparation in advance, and also describes necessary evacuation actions. The following actions will ensure proper preparation for evacuation:

- prior identification of individuals who may need assistance to evacuate;
- set-up a buddy system during the preparedness phase;
- train rescue teams, persons with disabilities and their family and caregivers in order to know how to work with persons with disabilities during an evacuation, using proper communication and attitudes; make sure the people engaged in organisation and evacuation understand the need for persons with disabilities to bring their assistive devices and medication. It is important to engage persons with disabilities at the preparation stage. The authors note the guidance that simulations or role play exercises where persons without disabilities take the role of persons with disabilities should be avoided;
- evacuation routes and paths must be properly designed respecting accessibility measures;
- timely information and accessible early warning systems are crucial for persons with disabilities;
- evacuation shelters or collective centres where persons with disabilities can be accommodated during and after the evacuation must be accessible to everyone.

28 Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action. Inter-Agency Standing Committee, 2019.

29 Step-by-Step Practical Guidance on Inclusive Humanitarian Field Work. Christian Blind Mission (CBM), 2017.
<https://hhot.cbm.org/>

Based on the above-mentioned international recommendations, the study analyses the evacuation processes pursuant to the following themed modules:

Module 1: available evacuation system for persons with disabilities and registration of persons with disabilities

Module 2: organising support for persons with disabilities during evacuation

Module 3: informing persons with disabilities about evacuation

Module 4: evacuation and transportation routes for persons with disabilities

Module 5: accessibility of shelters / accommodation after evacuation

2.2. ANALYSIS OF UKRAINIAN LEGISLATION ON EVACUATION OF PERSONS WITH DISABILITIES

MODULE 1 EVACUATION SYSTEM FOR PERSONS WITH DISABILITIES IN UKRAINE AND REGISTRATION OF PERSONS WITH DISABILITIES

IMPOSITION OF MARTIAL LAW IN UKRAINE AND SUBSEQUENT ACTIONS BY GOVERNMENTAL AUTHORITIES

Martial law was imposed in Ukraine on 24 February 2022 in connection with the aggression of the Russian Federation against Ukraine; it was in effect during the period of the study³⁰. According to the Plan for Imposing and Taking Actions of a Legal Regime of Martial Law in Ukraine³¹, the executive authorities and local self-government bodies are responsible for preparing and supporting the operations of public evacuation bodies, making population evacuation plans; where there is a threat to the life of the population, the SES and the defence council in the respective region or military administrations (if established) and/or military command are responsible for evacuating the population from dangerous regions.

During the first week after the start of the war, the persons designated responsible for organising evacuation of civilians via “humanitarian corridors” (from settlements that were temporarily under the enemy’s control) was the Vice Prime Minister of Ukraine and the Minister for Reintegration of the Temporarily Occupied Territories of Ukraine, in coordination with interested central executive authorities and respective military administrations³².

Moreover, with his Decree of 2 March 2022³³, the President of Ukraine established the Coordination Headquarters for Humanitarian and Social Affairs (hereinafter, the “Coordination Headquarters”) and instructed the Cabinet of Ministers of Ukraine to ensure the following: prompt interaction of the oblast military administration representatives with Coordination Headquarters; efficient cooperation with representative offices and consular missions of foreign states in Ukraine,

30 Decree of the President No. 64/2022 of 24 February 2022 “On the Imposition of Martial Law in Ukraine”.

31 The Plan was approved by Ordinance of the Cabinet of Ministers of Ukraine No. 181-p of 24 February 2022. <https://zakon.rada.gov.ua/laws/show/181-2022-%D1%80#Text>

32 Order of the Prime Minister of Ukraine No. 7116/0/1-22 of 4 March 2022.

33 Decree of the President of Ukraine No. 93/2022 of 2 June 2022 “On Coordination of Activities to Settle Humanitarian and Social Affairs” <https://zakon.rada.gov.ua/laws/show/93/2022#Text>

international organisations, and foreign donors connected with providing humanitarian assistance to Ukraine. Also, the National Bank of Ukraine was advised to open a special account to collect funds for humanitarian assistance to persons in difficult life circumstances connected with the Russian Federation's armed aggression against Ukraine.

Since many people refuse evacuation, the Cabinet of Ministers of Ukraine approved a form on 23 August 2022 for such persons to refuse evacuation³⁴.

It would be fair to note that public authorities tried to promptly respond to new challenges during martial law to a certain extent, which is proven by numerous amendments to and improvements of legislation on evacuation and persons with disabilities, as well as related regulatory acts (on mobilisation, crossing the border, automated extension of the term of disability and payment of pensions [benefits], allowance for internally displaced persons, compensations to owners of accommodations where such persons reside, etc.).

In particular, during the war, the Government made numerous amendments regarding **the border crossing rules for persons with disabilities and their accompanying persons**, in accordance with the Rules for Crossing the State Border by Ukrainian Citizens (1995)³⁵. Most amendments were initiated by the Ministry of Social Policy of Ukraine. The corresponding amendments include:

- **giving the priority right to cross the border** to persons with disabilities of group I and children with disabilities, as well as their accompanying persons (up to two persons); to organised groups of persons with disabilities or other persons in need of permanent care who reside/stay in care facilities and who travel by bus, and their accompanying persons;
- lifting restrictions on the **number of trips** abroad for persons with disabilities and their accompanying persons;
- regulating the matter of **confirming the fact** of care by persons who take care of a person in need of such care;
- giving **permission** to return to Ukraine and travel abroad to persons under their care to the persons who takes care of a person in need of such care, residing abroad and registered with a consular mission there.

34 Resolution of the Cabinet of Ministers of Ukraine No. 940 of 23 August 2022 "On Amending Certain Resolutions of the Cabinet of Ministers of Ukraine on Improving the Evacuation Mechanism" <https://zakon.rada.gov.ua/laws/show/940-2022-%D0%BF#n27>

35 Rules for Crossing the State Border by the Ukrainian Citizens approved by Resolution of the Cabinet of Ministers of Ukraine No. 57 of 27 January 1995.

The procedure for assigning a disability group for the period of martial law in Ukraine and for six months after its termination or cancellation³⁶:

- 1) the medical and social expert commissions were given the right to take a decision on **assigning the disability group by correspondence**, based on the recommendation of the medical and consulting commission, in case the person who applies for a disability group cannot arrive for examination;
- 2) the medical and social expert examination **to assign a disability group** is performed **regardless of the place of an applicant's registration, residence, or stay**. In other words, all the medical and social expert commissions perform their functions **based on the territoriality principle**;
- 3) the repeated examination scheduled for the period of martial law in Ukraine shall be adjourned until termination or cancellation of martial law, but in any case within six months following the termination or cancellation thereof, provided that the following persons cannot be referred: persons with disabilities, persons with an established degree of occupational capacity (in percentage), and children with disabilities;³⁷
- 4) **automatic extension of the term of disability** provided that a person of major age cannot be referred to a medical and social expert examination, and a child **cannot be referred** to a medical and consulting commission. **At the same time, the cases when the children cannot be referred** to such commissions are not defined, which creates uncertainty regarding automated extension of pensions and benefits.

The Ministry of Social Policy has initiated approval of a mechanism for temporary displacement (evacuation) of children and persons who reside in or are registered with facilities of different types, ownership forms, and subordination for 24/7 care, during martial law. Evacuation of the children and persons who reside in or are registered with facilities of different types, ownership forms, and subordination for 24/7 care is governed by the procedure for temporary displacement (evacuation) and the creation of conditions for staying on the territory of Ukraine without hostilities, or outside Ukraine for the children and persons who reside in or are registered with facilities of different types, ownership forms, and subordination for 24/7 care. The procedure was approved by Resolution of the Cabinet of Ministers of Ukraine No. 385 of 27 March 2022.

36 Resolution of the CMU No. 225 of 8 March 2022 "Certain Issues of the Procedure for Medical and Social Expert Examination during the Martial Law in Ukraine".

37 Amendments to the Regulation on the Medical and Social Expert Examination approved by Resolution of the Cabinet of Ministers of Ukraine No. 131 of 3 December 2009, and the Procedure for the Medical and Consulting Commissions to Assign Disability Groups to Children approved by Resolution of the Cabinet of Ministers of Ukraine No. 917 of 21 November 2013.

This Procedure applies to such facilities of different types, ownership forms, and subordination as:

- orphanages (including specialised ones), centres of medical rehabilitation and palliative care for children;
- pre-school and general secondary educational establishments (including orphan homes, health resorts, and special and specialised general secondary educational establishments with board housing as a part thereof);
- small group homes;
- children's shelters, social support centres for children and families, permanent services (departments) of social service centres in charge of children's social and psychological rehabilitation, permanent services (departments) of children's social and psychological rehabilitation (provision of social and psychological rehabilitation services to children in difficult life circumstances) at social service centres;
- social rehabilitation schools and colleges;
- orphan care homes in the social protection system;
- care homes for the elderly and persons with disabilities, specialised homes for war and labour veterans, and other facilities that provide temporary accommodation and social services to persons of major age and families with children in difficult life circumstances;
- other facilities (including the ones established by public, charitable, and religious organisations) that provide accommodation and 24/7 stay to children and persons.

Local executive bodies in territories with active hostilities take measures to urgently displace (evacuate) the children and persons who permanently reside in different facilities to territory without hostilities or outside Ukraine on a temporary basis. Moreover, the central executive authorities (namely the Ministry for Reintegration of the Temporarily Occupied Territories, the Ministry of Defence, and the Ministry of Internal Affairs) with the participation of Ukrainian Railways JSC, decide on safe routes for such temporary displacement (evacuation). As for the places where evacuated persons can be temporarily accommodated, it should be noted that this matter pertains to the competence of a large number of executive authorities on all levels (Ministry of Health, Ministry of Education and Science, Ministry of Internal Affairs, Ministry of Defence, Ministry of Youth and Sports, Ministry of Culture and Information Policy, and regional and Kyiv oblast military administrations³⁸) under the guidance of the National Social Service of Ukraine (NSS).

38 Drawn up on the basis of the Procedure for temporary displacement (evacuation) and creation of conditions for staying in the territory of Ukraine without hostilities, or outside Ukraine for the children and persons who reside in or are registered with facilities of different types, ownership forms and subordination for 24/7 care, which was approved by Resolution of the Cabinet of Ministers of Ukraine No. 385 of 27 March 2022 <https://zakon.rada.gov.ua/laws/show/385-2022-%D0%BF#Text>

According to the NSS, as of the end of July 2022:

- 4,200 residents (both adults and children) from forty boarding facilities and inpatient departments at territorial social service centres were evacuated from 24 February 2022 until August 2022 to corresponding facilities in the western regions of Ukraine; and 938 persons were evacuated abroad (Germany, Poland, Spain, Italy, and Latvia);
- the premises of residential and administrative buildings and other structures at thirteen boarding facilities in the social protection system were severely damaged by shell attacks by the Russian Federation. The premises of three facilities can no longer be used as accommodation; the persons under care who resided there were evacuated;
- there are twenty-four boarding facilities where around three and a half thousand persons reside in five oblasts in temporarily occupied territories. The data cannot be updated since there is no postal or telephone communication with the facilities.

EXECUTIVE AUTHORITIES ENGAGED IN EVACUATION AND THEIR POWERS

According to the Civil Protection Code of Ukraine:

- The Ministry of Internal Affairs of Ukraine is the central executive authority in charge of implementing public policy for civil protection.
- The State Emergency Service of Ukraine is the central executive authority in charge of implementing public policy for civil protection; organising and implementing actions to evacuate the population; and, coordinating the activities of the central and local executive authorities, bodies, and other economic entities on these matters.
- The Council of Ministers of the Autonomous Republic of Crimea, local state administrations, and local self-government bodies are responsible for organising and conducting (performing) evacuation of the population, their accommodation, and essential services.

The evacuation commission established by the Council of Ministers of the Autonomous Republic of Crimea, the local state administration, the local self-government body organises *notification, evacuation, and arrival of persons with disabilities*³⁹ (including ones with vision, hearing, and mobility impairments; and intellectual or mental disorders) to

³⁹ According to Clause 40 of the Procedure for Evacuation in Case of the Threat or Occurrence of Emergencies (Armed Conflicts) approved by Resolution of the Cabinet of Ministers of Ukraine No. 841 of 30 October 2013.

assembly points in accordance with the requirements of Resolution of the Cabinet of Ministers of Ukraine No. 282 of 18.04.2018. The activities planned to evacuate persons with disabilities and other reduced-mobility population groups are stated in the population *evacuation plan* as a separate section⁴⁰.

In case there are armed conflicts, the population is evacuated to safe areas from the areas of possible hostilities, as determined by the General Staff of the Armed Forces of Ukraine for the special period.

Evacuation is ensured by:

- 1)** establishing regional, local, and facility evacuation bodies;
- 2)** planning evacuation;
- 3)** determining the safe areas suitable to accommodate the evacuated population and property;
- 4)** organising notification of the heads of economic entities and the population about the start of evacuation;
- 5)** organising evacuation management;
- 6)** ensuring essential services for the evacuated population at the sites of their safe accommodation;
- 7)** training the population on how to act during evacuation.

Evacuation bodies are established at the central executive authorities, Council of Ministers of the Autonomous Republic of Crimea, local state administrations, local self-government bodies, and economic entities in order to plan, prepare, and conduct evacuation. Evacuation bodies include evacuation commissions, assembly evacuation points, intermediate evacuation points, and receiving evacuation points.

The evacuation commission chairperson and members are designated by the body that has resolved to establish the evacuation bodies. In an emergency, such commissions establish operational groups that start working as soon as the decision to evacuate the population is taken.

According to the SES, evacuation commissions have been established in all Ukraine regions on a permanent basis. The effective legislation does not provide for establishing a separate evacuation commission when a legal regime of a state of emergency or martial law is imposed. Moreover, it does not provide for establishing separate commissions that would be in charge of matters of barrier-free environment and evacuation of persons with disabilities.

40 Section V of the Guidelines on Planning Evacuation Activities approved by Order of the MIA No. 579 of 10.07.2017.

Evacuation commissions are responsible for:

- planning evacuation at the corresponding level;
- preparing the population for evacuation activities;
- preparing evacuation bodies to perform their tasks;
- controlling the preparation of evacuation;
- receiving and accommodating the evacuated population.

Moreover, subject to the existence of various entities that provide work or services to persons with disabilities and while developing evacuation activities, the evacuation commissions have to communicate with representatives of:

- enterprises, institutions and organisations of the Ukrainian Association of the Blind and the Ukrainian Society of the Deaf, other entities where persons with disabilities work;
- boarding facilities in the social field and social service providers (both for children and adults), boarding houses for the elderly, etc.;
- boarding schools with 24/7 stay for children with disabilities and development disorders;
- healthcare institutions with 24/7 stay for children and adults.

Evacuation is organised by the Council of Ministers of the Autonomous Republic of Crimea, local state administrations, local self-government bodies, and heads of economic entities. There is also an example of establishing an evacuation coordination headquarters in a specific region, Donetsk Oblast. The Separate Resolution of the Cabinet of Ministers of Ukraine No. 854 of 29 July 2022 established the Coordination Headquarters for Preparing the Mandatory Evacuation of the Population of Donetsk Oblast during Martial Law and designated its members (officials only) and chairperson (the Vice Prime Minister of Ukraine and the Minister for Reintegration of the Temporarily Occupied Territories).

Then the Resolution “On Mandatory Evacuation of the Population from Donetsk Oblast” was adopted on 2 August 2022 by Ordinance of the Cabinet of Ministers of Ukraine No. 679-p.

However, unfortunately, **the regulatory framework does not clearly allocate among public authorities the powers associated with evacuating persons with disabilities.** The legislation mostly entrusts everything to “local authorities” and “evacuation commissions”, but they have not always managed to duly organise the evacuation of persons with disabilities taking account of the special aspects of their impairments.

These difficulties are caused by the fact that the existing rules for organising the evacuation of persons with disabilities are of general or sometimes even declarative nature; there are no specific instructions on the evacuation of persons with different types of impairments.

This problem could be resolved by engaging in the work of the commissions and coordination headquarters persons with disabilities, or their representatives, who would help understand the needs of persons with disabilities during evacuation. Unfortunately, **although it is not forbidden, the legal and normative acts do not provide for including into evacuation commissions persons with disabilities and/or organisations acting on their behalf, or entities that provide work or services to persons with disabilities. Also, there are no rules that would provide for engaging these groups into planning and implementing evacuation procedure, although this approach is envisaged by the humanitarian law.**

Despite the material contribution made by charitable, volunteer, civil society, and other non-governmental organisations into evacuating the population, including persons with disabilities, analysis has demonstrated that none of their representatives are members of the Coordination Headquarters for Preparing the Mandatory Evacuation of the Population of Donetsk Oblast during Martial Law, approved by Resolution of the Cabinet of Ministers of Ukraine No. 854 of 29 July 2022. Also, none of the respondents have stated that they are aware of persons with disabilities being members of such commissions or engaged in developing evacuation plans.

At the same time, respondents have often emphasised that representatives of associations of persons with disabilities, initiative groups of persons with disabilities, and other civil society organisations that provide services to persons with disabilities play a major role in organising and implementing the evacuation of persons with disabilities.

Persons with disabilities and/or organisations acting on their behalf must be engaged in the activities of evacuation commissions, since persons with disabilities are best aware of the problems, barriers, and obstacles they face daily.

PLANNING THE EVACUATION OF PERSONS WITH DISABILITIES

It is prescribed by the regulations⁴¹ that a population evacuation plan be developed by the evacuation commission, signed by its chairperson, affirmed by the head of the authority that established the commission, and approved by the authority in the territory of which the evacuated population is going to be hosted.

Evacuation activities in case of the threat of armed conflicts (from areas of possible hostilities into safe areas) are specified in the civil protection plan for the special period as a separate section, which describes peculiarities of mandatory evacuation of a population.

While planning the activities to evacuate persons with disabilities and other reduced-mobility population groups, the evacuation commission shall:

- assess the scope and nature of evacuation activities;
- determine the priorities and peculiarities during evacuation of persons with disabilities, namely those with vision, hearing, or mobility impairments; intellectual or mental disorders, and other reduced-mobility population groups (and persons who accompany them), including those in healthcare, educational, and social protection facilities.

When the scope and nature of evacuation activities are assessed, the following shall be determined:

- number of persons with disabilities with mobility impairments (the numbers of those who can get around on their own, who use wheelchairs, and who are bedridden are determined separately);
- number of persons with disabilities and other reduced-mobility population groups in need of third-party aid and medical support during evacuation;
- number of persons who accompany the persons with disabilities;
- healthcare professionals necessary to accompany persons with disabilities;
- places of permanent residence (stay) of persons with disabilities;
- routes to the evacuation assembly points;
- procedure for the arrival of persons with disabilities who cannot get around on their own at evacuation assembly points, or for their evacuation from a place of permanent residence;
- methods for alerting and informing persons with disabilities, subject to the nature of their disability.

41 Procedure for Evacuation in Case of the Threat or Occurrence of Emergencies (Armed Conflicts) approved by Resolution of the Cabinet of Ministers of Ukraine No. 841 of 30 October 2013.

The activities planned to evacuate persons with disabilities and other reduced-mobility population groups are stated in the population evacuation plan as a separate section “Peculiarities of planning the evacuation of persons with disabilities and other reduced-mobility population groups.” This section contains information on:

- number of persons with disabilities and the persons who accompany them;
- vehicles to be involved;
- points where persons with disabilities get on (off) such vehicles;
- installation of special equipment on the vehicles for persons with disabilities to get on (off) and be carried;
- use of special medical vehicles to carry persons with disabilities (where necessary).

The lists of citizens to be evacuated are made in three copies: the first one for the party that manages the economic entity or house; the second for the evacuation assembly point following an update of lists (in case a decision on evacuation is received); and the third for the receiving evacuation point. Such lists are annually adjusted by the parties that manage economic entities and houses.

According to the SES, evacuation of the population was planned in the civil protection plans for the special period, as a separate section taking account the established requirements, during the preliminary planning by the oblast state administrations, based on the designated areas. The SES informs that the planning “uses data from healthcare and social protection units, groups responsible for detecting and accompanying persons with disabilities established at the local state administrations, executive bodies of the city, and city district (if established) councils.”

Availability of evacuation plans was also confirmed by the Government Commissioner for the Rights of Persons with Disabilities in her interview,

“On 23 February 2022, we had a meeting with the representatives of the SES, the MES, the MoH, and the Ministry of Social Policy to discuss whether we were ready. All the officials said that we were ready, we had everything we needed, and there was a regulatory framework and evacuation plans.” According to the Government Commissioner, that meeting gave her an opportunity to meet many officials who would later help her evacuate persons with disabilities during the war.

However, according to the respondents, the real-life situation turned out to be much more difficult and unpredictable.

The launch of Russia’s aggression against Ukraine and aggressive actions by the enemy, and the quick changes in the military situation prevented the local executive authorities from evacuating the population in accordance with existing plans. Most people had to leave dangerous territories on their own, by their own cars or vehicles of their acquaintances and volunteers, as well as on evacuation trains (according to the SES).

This was also confirmed by representatives of local authorities and non-governmental organisations that had carried out evacuation of the population. **The respondents noted that many of the evacuation preparation activities, including evacuation plans and vehicles adapted to the needs of persons with disabilities, existed on paper only.**

Also, most representatives of non-governmental organisations that organised the evacuation of persons with disabilities referred to the improper and critical condition of most premises where they had to temporarily accommodate persons with disabilities during evacuation, and also the lack of architecturally accessible places for the permanent accommodation of such categories of persons.

However, on 16 September 2022, Vice Prime Minister Iryna Vereshchuk claimed on air at RADA TV Channel that “*all the conditions have been created for reduced-mobility population groups during their evacuation from dangerous regions.*”⁴²

Nevertheless, during this study, officials from the Ministry for Reintegration and SES answered many of the questions from the study methodology with no focus on the disability aspect and claimed that those matters pertained to the competence of local authorities and SES units. For instance, during a telephone conversation and correspondence, Ministry for Reintegration representatives explained that “*those matters are beyond our competence.*”

Therefore, it can be concluded that the approach to planning evacuation of the population that is prescribed by effective legislation needs to be revised. The plans could often not be followed during rapid hostilities and failed to consider the needs of persons with various types of impairments.

42 <https://www.kmu.gov.ua/news/iryna-vereshchuk-na-humanitarnomu-fronti-zakhyshchajemo-usikh-khto-potrebuie-dopomohy>

According to the NSS, as of 30 June 2022, there are 4.7 million internally displaced persons, including more than 1.225 million elderly and more than 172,000 persons with disabilities.

There are no official statistics about the number of persons with disabilities who have left Ukraine.

According to the estimates of the National Assembly of Persons with Disabilities of Ukraine, around 400,000 persons with disabilities have gone abroad.

In its turn, the SES informed in its letter No. 03-3463/162-1 on 8 July 2022 that “according to the oblast military administrations, the number of people displaced (evacuated) from areas of hostilities to three safe areas without active hostilities from 24 February 2022 until now is more than 1.866 million persons, including more than 33,000 persons with disabilities and other reduced-mobility population groups and more than 503,000 children.”

Ukrzaliznytsia JSC informed that 114,180 special-fare tickets were sold to passengers with disabilities for long-distance and suburban trains from 01 March 2022 until 30 June 2022.

According to a letter from the Ministry for Reintegration⁴³ No. 22/22.3-4408-22 on 20 July 2022, “at the beginning of the war, humanitarian corridors were opened almost every day. From March to May 2022, there were 165 humanitarian corridors for evacuating the population, including persons with disabilities, from areas of hostilities and temporary occupation in six oblasts: Kyiv, Luhansk, Sumy, Kharkiv, Zaporizhzhia, and Donetsk. More than 300,000 persons have been evacuated.” Unfortunately, the Ministry for Reintegration has furnished no statistics on the number of evacuated persons with disabilities.

Resolution of the Cabinet of Ministers of Ukraine No. 282 of 18 April 2018 approved the Procedure for Detecting Persons with Disabilities and Other Reduced-Mobility Population Groups Residing in the Area of Emergency or Possible Destruction, and for Organising Their Accompaniment. The purpose of this document is to detect and register all persons with disabilities and other reduced-mobility population groups before an emergency situation, based on established criteria, and to assist them during evacuation.

43 Letter of the Ministry for Reintegration No. 22/22.3-4408-22 of 20 July 2022.

Analysis has detected inconsistency of the regulatory framework: The Civil Protection Code of Ukraine does not provide for any authority for the Cabinet of Ministers of Ukraine to approve this Procedure. The Civil Protection Code of Ukraine does not require the public authorities to detect persons with disabilities and other reduced-mobility population groups residing in an area of emergency or possible destruction, nor to organise their accompaniment. The MIA and the SES have to resolve the matter of consistency of the above-mentioned legal and normative acts in order to respect the rights of persons with disabilities in an area with the state of emergency.

Moreover, this Procedure establishes an operational mechanism only for the oblast, Kyiv city, district and Kyiv district state administrations, executive bodies of the city, and city district (if established) councils to detect persons with disabilities and other reduced-mobility population groups who have stayed in an area of emergency and to organise accompaniment of such persons. Therefore, the persons residing in urban-type settlements and villages are disregarded.

According to the Procedure, the groups established by local authorities that are responsible for detecting and accompanying such persons make lists of persons with disabilities and other reduced-mobility population groups and the type of assistance they need, and furnish such lists to the local state administrations, executive bodies of the city, and city district (if established) council.

At the same time, according to the SES, their local staff use the lists provided by social and medical services rather than the ones made in accordance with the Procedure.

The Procedure for Evacuation in Case of the Threat or Occurrence of Emergencies (Armed Conflicts) approved by Resolution of the Cabinet of Ministers of Ukraine No. 841 of 30 October 2013 provides for the need to make lists of citizens (other than those under the Procedure approved by Resolution of the Cabinet of Ministers of Ukraine No. 282 of 18 April 2018) to be evacuated in three copies. The first copy for the party that manages the economic entity or house; the second for the evacuation assembly point following the update of the lists (in case a decision on evacuation is received), and the third for the receiving evacuation point. Such lists are annually adjusted by the parties that manage economic entities and houses. The study did not establish any facts of execution or the existence of two types of lists at once; during interviews, respondents only mentioned the lists of persons registered with territorial social service centres or treated in hospitals.

In other words, although the Procedure approved by Resolution of the Cabinet of Ministers of Ukraine No. 282 of 18 April 2018 is positive and necessary, it has a number of implementation issues and is not fully consistent with the Civil Protection Code of Ukraine or with the Procedure for Evacuation in Case of the Threat, the Occurrence of Emergencies (Armed Conflicts) approved by Resolution of the Cabinet of Ministers of Ukraine No. 841 of 30 October 2013, or the Guidelines on Planning the Evacuation Activities approved by Order of the MIA of Ukraine No. 579 of 10.07.2017 and developed in pursuance thereof. Moreover, the Civil Protection Code of Ukraine and acts developed in pursuance thereof also need to be improved in terms of persons with disabilities.

Respondents noted that the Procedure for Detecting Persons with Disabilities and Other Reduced-Mobility Population Groups Residing in the Area of Emergency or Possible Destruction, and for Organising Their Accompaniment approved by Resolution of the Cabinet of Ministers of Ukraine No. 282 of 18 April 2018 were “cumbersome” for implementation. According to respondents, practical application of the rules demonstrated that the administration of such a large number of people (the need to regularly find out whether thousands of people had been evacuated or not, where they resided, whether they had moved or just incidentally did not answer the phone) could not be carried out without lots of officials, but a large number of officials could not be designated to do the corresponding work. The existence of such a document separately from the Procedure for Evacuation in Case of the Threat or Occurrence of Emergencies approved by Resolution of the Cabinet of Ministers of Ukraine No. 841 of 30 October 2013 also had a negative impact upon the evacuation process. Officials mostly said that they had used during the evacuation the lists of persons registered with the territorial social service centres or treated in hospitals, but none of them mentioned the lists made under Resolution of Cabinet of Ministers of Ukraine No. 282 of 18 April 2018.

Resolution of the Cabinet of Ministers of Ukraine No. 385 of 27 March 2022 does not oblige the National Social Service to register every temporarily displaced (evacuated) child or person who resides or is registered with facilities of different types, ownership forms, and subordination for 24/7 stay and who have been temporarily displaced within Ukraine, nor to indicate names of the facilities and settlements.

Moreover, analysis demonstrated that registration of persons subject to evacuation at the local level did not contain all the information necessary to consider during evacuation the needs of persons with various types of impairments. There is no algorithm at the local level to determine the priorities and peculiarities during evacuation

of persons with disabilities since Ukraine has no state statistics of persons with vision, hearing, or mobility impairments, or intellectual or mental disorders, or other reduced-mobility population groups. Thus, for instance, the Procedure for Executing and Issuing a Certificate of Registration for an Internally Displaced Person⁴⁴ provides a place for entering data on a disability and the need for technical and other rehabilitation means for persons who have already been evacuated and registered as IDPs into the Unified Information Database of Internally Displaced Persons, which is kept by the Ministry of Social Policy. However, the information in the database is limited and does not describe specific needs regarding the accommodation of IDPs with disabilities taking into account the type of impairment. It also does not specify which of the needs of such person with disabilities must be satisfied in the first place to respect the right for decent living conditions, i.e., there are no recommendations on mainstreaming the needs of evacuated persons with disabilities.

Exhaustive records on persons with disabilities based on types of impairments, both in the communities that plan evacuations and the communities that host evacuated populations, would allow considering specific needs subject to the impairment at the community level, planning evacuation activities with a better focus, and ensuring accommodation of persons with disabilities in the receiving communities after evacuation accounting for their needs.

Therefore, it is necessary to consolidate the available data and to update the records, firstly, on persons with disabilities by different types of impairments, including with disaggregation by sex and age.

MONITORING

According to the information furnished to the research team, the SES has established an electronic database of evacuation plans in order to assess the performance of SES plans. The SES informed the research team that all population evacuation plans at the regional level were consistent with the rules of Section V of the Guidelines⁴⁵. The plans are also checked by the SES during command and staff exercises with territorial sub-systems of the Unified State System for Preventing and Responding to Man-Made and Natural Emergencies, complex and control inspections, drills, etc., with mandatory practice of population evacuation activities (including as regards persons with disabilities).

44 Approved by Resolution of the Cabinet of Ministers of Ukraine No. 509 of 1 October 2014.

45 Guidelines on Planning Evacuation Activities approved by Order of the MIA No. 579 of 10.07.2017, registered with the Ministry of Justice of Ukraine on 01.08.2017 under No. 938/30806.

After the control inspections, the SES reported some cases of failure to adhere to the requirements of Resolution of the Cabinet of Ministers of Ukraine No. 282 of 18.04.2018 on detecting persons with disabilities and other reduced-mobility population groups residing in an area of emergency or possible destruction, and for organising their accompaniment, namely:

“It should be noted that in many cases, there are no sufficiently equipped ramps at the assembly points, vehicles do not always have means for such persons who are unable to arrive at the assembly points on their own to get on and off, or there are not enough of them.”

Analysis of the regulatory framework has demonstrated that none of the executive authorities in Ukraine monitor or analyse the respect for rights and interests during evacuation of persons with disabilities. Thus, the plans for principal civil protection activities for 2014-2022 approved by the Government (except for the respective plan for 2021) contain no material activities to consider the needs of persons with disabilities; so respect for these needs is not monitored.

It can be concluded that the existing system for planning evacuation activities needs to be improved, firstly, as to the engagement of persons with disabilities at all stages: planning, training, monitoring, and control over implementation.





RECOMMENDATIONS:

- ✓ Ensure adequate implementation of Article 11 of the UN Convention on the Rights of Persons with Disabilities by improving the existing civil protection system in order to fully consider the rights and interests of all persons with disabilities, including persons with hearing and speaking impairments, deaf persons, persons with vision impairment and blind persons, persons with mobility impairment and self-care difficulties, persons with cognitive impairment; and by expanding the legislative rules on evacuation to each impairment / nosologic disease, namely:
- ✓ **Include persons with disabilities** and/or organisations acting on their behalf, and entities that provide work or services to persons with disabilities in **evacuation commissions** / coordination headquarters responsible for evacuating the population during martial law, and also **engage them in developing evacuation plans** or consult them in order to consider the needs of persons with disabilities, taking into account the peculiarities of their impairments more efficiently.
- ✓ Develop guidelines on making population evacuation plans that take into account the needs of persons with disabilities based on types of impairments during evacuation, namely providing special vehicles, assistive rehabilitation products, personal hygiene products and medical devices, etc. For this purpose, oblige local social protection units to keep records on persons with disabilities by types of impairments (vision, hearing, speaking, mobility, cognitive disorders, and self-care difficulties) in the Procedure for Evacuation in Case of the Threat or Occurrence of Emergencies (Armed Conflicts)⁴⁶. The Washington Group Short Set should be used to keep such records⁴⁷.
- ✓ Authorise the NSS **to register every temporarily displaced (evacuated) child and person who resides in or is registered with facilities** of different types, ownership forms, and subordination for 24/7 care and who have been temporarily displaced within Ukraine, with specification of the name of facilities and settlements, by amending the procedure for temporary displacement (evacuation) and creating conditions for staying in the territory of Ukraine without hostilities, or outside Ukraine for children and persons who reside in or are registered with facilities of different types, ownership forms, and subordination for 24/7 care⁴⁸.

46 Resolution of the Cabinet of Ministers of Ukraine No. 841 of 30 October 2013 on Approving the Procedure for Evacuation in Case of the Threat or Occurrence of Emergencies.

47 <https://www.washingtongroup-disability.com/resources/translations-of-wg-question-sets/>

48 Resolution of the CMU No. 385 of 27 March 2022 on Approving the Procedure for temporary displacement (evacuation) and creation of conditions for staying in the territory of Ukraine without hostilities, or outside Ukraine for the children and persons who reside in or are registered with facilities of different types, ownership forms, and subordination for 24/7 care.

-  Bring the Procedure for Detecting Persons with Disabilities and Other Reduced-Mobility Population Groups Residing in an Area of Emergency or Possible Destruction and for Organising Their Accompaniment in line⁴⁹ with the Civil Protection Code of Ukraine and legal and normative acts on evacuation developed in pursuance thereof⁵⁰, and establish a **procedure for the arrival of persons with disabilities** who cannot get around on their own at **evacuation assembly points** or for their **evacuation from places of permanent residence**.
-  Introduce liability for entities responsible for preparing and carrying out evacuation and accommodating evacuated persons in shelters for failure to consider the needs and for violations of the rights of persons with disabilities during evacuation, and designate the entity that would hold the legislative right to impose liability for respective violations.
-  Determine the cases when a person of major age cannot be referred to a medical and social expert examination, and when a child cannot be referred to a medical and consulting commission by amending Resolution of the Cabinet of Ministers of Ukraine No. 225 of 8 March 2022.
-  Authorise the SES to monitor during its control inspections of population evacuation plans in the regions whether authorities responsible for evacuation consider the needs of persons with disabilities by different types of impairments. Carry out such monitoring with participation of persons with disabilities and/or their representatives. Make public the results of such monitoring.

49 Resolution of the CMU No. 282 of 18 April 2018 on Approving the Procedure for Detecting Persons with Disabilities and Other Reduced-Mobility Population Groups Residing in the Area of Emergency or Possible Destruction, and for Organising Their Accompaniment.

50 Order of the MIA No. 579 of 10 July 2017 "On Approving the Guidelines on Planning Evacuation Activities".

MODULE 2 ORGANISING SUPPORT FOR PERSONS WITH DISABILITIES DURING EVACUATION

TRAINING

In order to effectively consider the needs of persons with disabilities during evacuation, the staff directly involved in communicating with persons with disabilities must be trained.

Training of rescue teams is provided and conducted by the SES in accordance with legal and normative acts:

Thus, it was stated by the SES during the study that, in pursuance of an action plan for implementing the National Strategy for Creating a Barrier-Free Environment in Ukraine by 2030 and to ensure social adaptation of persons with hearing impairment and their medical support, and efficient and prompt assistance to these persons, an online training for the SES staff had been launched on the fundamentals of fingerspelling, sign language, and sign interpretation and on elements of the sign language. The staff of the psychological and medical services of the SES were trained.

“During the training, the staff of the service were given an opportunity to practice the main expressions and words that would help them communicate with persons with hearing impairment during an emergency situation, including when psychological and medical aid is provided to persons with hearing impairment and deaf persons. Knowledge of sign language enables the professionals of the service to understand a person’s intentions, character, condition, or mood by interpreting his or her pose, movements, or gestures,” said the SES representative.

Nevertheless, many respondents noted the lack of knowledge and skills of various response services during evacuation in connection with assisting persons with various impairments.

It was found during the survey of persons with disabilities that the activities prescribed by the regulatory framework and practical work for persons with disabilities were mostly directed at persons in wheelchairs and other citizens with reduced mobility. The respondents from civil society organisations emphasised that the commissions they had worked with were unaware of matters of evacuating persons with hearing and speaking impairments, including deaf persons, persons

with vision impairment and blind persons, persons with mobility impairment and self-care difficulties, and persons with cognitive impairment:

Moreover, only a few representatives of civil society organisations noted that they trained the SES rescue teams on the peculiarities of dealing with persons with reduced mobility.

Extract from an interview with Olha Volkova, the head of the NGO Centre of Social Adaptation of Persons with Disabilities “Ocean of Good” (Dnipro):

I regularly conduct such trainings on how to properly pick up a wheelchair so that it will not get broken, and [so that] a person with a disability will be comfortable, etc., but it is not enough. Such training must be conducted on a regular basis or regulated at the level of the training system for rescue team members.

Therefore, it can be concluded that **training for staff from different executive authorities involved in evacuating persons with disabilities under the regulatory acts do not cover aspects of interaction with persons with various types of impairments.**

Training modules that would cover the peculiarities of work with persons with various types of impairments must be developed.

As for training of other evacuation commission members, the researchers **did not find any information on training guidelines or instructions that would help consider the different needs of persons with disabilities during evacuation.** Therefore, training modules need to be developed for a wide circle of stakeholders who might be involved in evacuations and need to cover how to treat persons with disabilities during evacuation in order to consider their needs.

Moreover, some respondents emphasised the need to train multi-disciplinary teams. Thus, it was noted by a representative of a humanitarian headquarters in Lviv Oblast:

I would like to point out that the rescue teams that came to us at the Arena Lviv from abroad to help evacuate persons with disabilities worked in a very coordinated manner, and they had obviously been trained on such work.

They picked the persons up for treatment abroad in a special vehicle for bedridden patients – even the ones who had had a stroke – stabilised the patient and fixed them with special belts for comfortable transportation to hospitals abroad... Such team trainings are extremely important and necessary at the level of multi-disciplinary teams, not only healthcare and SES professionals, but also social workers and volunteers.

The cases of cooperation between local self-government bodies and executive bodies and persons with disabilities and organisations acting on their behalf that were detected during the study prove the efficiency of training with the participation of persons with disabilities.

Therefore, a conclusion can be made following the analysis: Local self-government bodies need to introduce a system for training on aspects of interacting with persons with different types of impairments for all entities involved in evacuation, including members of evacuation commissions, rescue teams; medical, social, and other workers involved in the population evacuation process; and, firstly, staff engaged to accompany persons with disabilities, e.g., railway station workers and volunteers. For this purpose, training materials containing clear recommendations on interaction with persons with different types of impairments need to be developed. The authorities responsible for organising evacuation should provide for the involvement of persons with disabilities in such training.

ACCOMPANIMENT

Resolution of the CMU No. 282 of 18 April 2018 provides for establishing groups responsible for detecting and accompanying persons with disabilities during evacuation. Moreover, inclusion of such groups in evacuation plans is controlled by the SES. Nevertheless, accompaniment was often chaotic during evacuations in 2022. Analysis of the responses given both by officials and by representatives of NGOs acting on behalf of persons with disabilities demonstrated that accompanying persons had often been relatives and family members, acquaintances, representatives of the SES, the railway company, children's and social services, or volunteers. As for evacuation of facilities where persons with disabilities were held, accompanying persons often were either a director, deputy director, or another representative of the facility.

Analysis of the answers given by persons with disabilities (see SECTION 3) showed that **no accompaniment was sometimes a reason why people had refused evacuation**. Therefore, accompaniment is an important element of the evacuation process.

Certain inconsistencies that hindered the organisation of efficient accompaniment abroad were detected during the analysis. In particular:

Although it is permitted by law, a male Ukrainian citizen aged 18 to 60 cannot leave Ukraine on their own without persons with disabilities under their care, in practice.

The law permits a male Ukrainian citizen aged 18 to 60 to leave Ukraine on their own without persons with disabilities and children with disabilities under their care, based on certain documents, which include a certificate of consular registration of such persons with disabilities and children with disabilities abroad. However, this rule cannot be implemented in practice since the foreign diplomatic missions of Ukraine either refuse to issue certificates of consular registrations or have no technical capacity. It is prescribed by Resolution of the Cabinet of Ministers of Ukraine No. 85 of 29 January 2020 “Certain Matters of Registration of Citizens of Ukraine Residing outside Ukraine” that respective certificates are issued after necessary hardware and software on information exchange are commissioned. Moreover, it is also prescribed by the Procedure that in case it is technically impossible to enter data into the Ministry of Foreign Affairs (MFA) special information system as of the date of receipt of an application for consular registration or de-registration, a mark (stamp) is to be affixed to the diplomatic passport of Ukraine, the service passport of Ukraine, or the foreign travel passport of a citizen of Ukraine.





However, according to the respondents of the study, foreign missions of Ukraine refuse to issue certificates or certify a copy of the passport with the respective mark (stamp). As has been stated by the Administration of the State Border Guard Service of Ukraine, a copy of a passport with the mark (stamp) that is certified by a diplomatic mission of Ukraine could be an alternative to the respective certificate.

Analysis did not reveal any mechanism for accompanying persons with grave forms of disability who have no relatives, but wish to be evacuated from Ukraine and can be hosted abroad, by representatives of state or municipal entities and/or charitable, volunteer, civil society, or other non-governmental organisations, with their further compulsory return.

“It is also necessary to regulate at the legislative level the matter of permitting males aged 18 to 60 to go abroad in order to accompany persons with grave forms of disability who have no relatives, but wish to be evacuated from Ukraine and can be hosted abroad. Many countries receive persons with disabilities, but want them to be accompanied. We do hope for your assistance as it only applies to some of persons with disabilities. I can furnish statistics for our oblast: around 10% of the blind live alone, and they do need help,” said the head of “BILA TROSTYNA” (Ivano-Frankivsk), a civil society organisation for women with disabilities.

Therefore, a conclusion can be made that the existing regulatory and legal framework provides for accompaniment of persons with disabilities during evacuation, but in practice such accompaniment has not always been available since the imposition of martial law in Ukraine in 2022, which sometimes made persons with disabilities refuse evacuation. The matter of males accompanying persons crossing the state border during martial law needs to be adjusted.

RECOMMENDATIONS:

-  Introduce an adequate system for training on aspects of interaction with persons with different types of impairments for all entities involved in evacuation, including members of multi-disciplinary teams, evacuation commissions, rescue teams, SES representatives; medical, social and other workers; psychologists, and other workers involved in accompanying persons with disabilities (railway station workers, volunteers, etc.) during evacuation.
-  Develop training materials that contain clear recommendations on interaction with persons with different types of impairments.
-  Engage persons with disabilities and/or organisations acting on their behalf, and entities that provide work or services to persons with disabilities in training rescue teams on how to evacuate persons with disabilities.
-  Develop a mechanism for accompanying persons with grave forms of disability who have no relatives, but wish to be evacuated from Ukraine and can be hosted abroad by representatives of state, municipal entities, and/or charitable, volunteer, civil society, and other non-governmental organisations, provided that they have to return.

MODULE 3 INFORMING PERSONS WITH DISABILITIES

Information on civil protection of the population of Ukraine includes data on emergency situations that are forecast or that have occurred with their classification, area, and effects, as well as methods and means of protection from them⁵¹.

The civil protection authorities shall furnish the population with prompt and reliable information via mass media (namely, on the emergency situations that are forecast or that have occurred, with their classification, area, and effects as well as methods and means of protection from them), as well as on their civil protection activities, including in a form accessible to persons with vision and hearing impairments. The civil protection authorities should be understood as executive authorities, the Council of Ministers of the Autonomous Republic of Crimea; executive bodies of the city, city district (if established), urban-type settlement, and village councils; governing bodies of enterprises, institutions, organisations, and also their structural subdivisions (officials) designated to directly manage activities in the field of civil defence pursuant to their competence.

The information must contain data on the entity providing it and the scope of its activities, on the nature of the possible risk during accidents (including the impact upon people and the environment), on the method for notifying the population of a possible or actual accident, and on the recommended conduct.

The civil protection authorities shall assist the mass media in providing current data to the population. Information on the effects of an emergency situation is made public in accordance with legislation on information.

According to the Regulation on the Organisation of Notification of the Threat or Occurrence of Emergencies and the Organisation of Communications in the Field of Civil Protection approved by Resolution of the Cabinet of Ministers of Ukraine No. 733 of 27 September 2017, notification of the population in the field of civil protection is provided by the civil protection authorities via mass media (television and radio networks) with data on the emergency situations that are forecast or that have occurred, with their classification, area, effects, and methods and means of protection from them, as well as on their civil protection activities, including with due consideration of the peculiarities of notifying persons with physical, mental, intellectual, and/or sensory impairments.

51 According to Article 31 of the Civil Protection Code of Ukraine.

The Civil Protection Basic Action Plan 2022 approved by Resolution of the Cabinet of Ministers of Ukraine No. 1742-p of 28 December 2021 provides for the following:

- notifying the population about the location of civil protection facilities and other facilities to be used as shelters in case of emergency situations;
- notifying the population of the procedure for staying and behaving in such facilities, taking into account accessibility thereof for persons with disabilities and other reduced-mobility population groups;
- notifying the population about the readiness of facilities for intended use;
- creating generally accessible information resources on this matter.

Signals and notices about the threat of occurrence of or the occurrence of emergency situations for the population, as well as notification, are within the competence of:

- Joint-Stock Company “National Public Television and Radio Company of Ukraine”, state and public television and radio companies, and public and other television and radio organisations with any ownership form by means of their television networks and radio broadcasting networks (with information followed by sign language and/or subtitles if voiced, and by audio comments if visual);
- electronic communications operators by means of public electronic communications networks (telephone communications, text messages);
- via Internet resources (websites, social media).

Signal and loud speakers (including those installed in vehicles involved in notification), electronic information panels, electric sirens, and other devices are used to transmit alerting signals and notices.

During the notification, signals and notices have to be brought to the attention of persons with physical, mental, intellectual, and sensory impairments; heads of enterprises, institutions, and organisations of the Ukrainian Association of the Blind and the Ukrainian Society of the Deaf; other enterprises, institutions, and organisations that provide services to persons with disabilities and other reduced-mobility population groups determined by the local executive bodies and local self-government bodies, or at the work place of such persons (in an accessible forms); and, heads of boarding houses, healthcare institutions with inpatient departments, and penitentiary facilities.

Heads of local self-government bodies, enterprises, institutions, and organisations of any ownership form; and owners of public facilities have to install signal and loud speakers; electronic information panels in settlements, at enterprises, institutions, and organisations, public facilities; and, radio room speakers to broadcast information on civil protection in service and production premises (including at educational and boarding facilities, healthcare institutions, penitentiary facilities; at enterprises, institutions, and organisations that provide services to persons with disabilities and other reduced-mobility population groups, or at the work place of such persons).

The Civil Protection Code of Ukraine provides for an obligation to ensure notification of the population about emergency situations, including in a form accessible only to persons with vision and hearing impairments. At the same time, according to the Regulation on the Organisation of Notification of the Threat or Occurrence of Emergencies and the Organisation of Communications in the Field of Civil Protection approved by Resolution of the Cabinet of Ministers of Ukraine No. 733 of 27 September 2017, notification shall be carried out not only accounting for the peculiarities of persons with vision and hearing impairment, but also of persons with physical, mental, and intellectual impairments. No legal and normative acts describe differences in notifying persons with disabilities of emergency situations subject to the type of their impairment.

Access to the latest information is of crucial importance before, during, and after an emergency situation as it can save lives. It is also fundamental for assistance without any discrimination and equal access for persons with disabilities.

The practical recommendations developed by the international organisation CBM Global Disability Inclusion include the following simple steps on how to make information accessible to everyone:

- Consult persons with disabilities or organisations acting on their behalf as to the means of communication they prefer.
- Test the accessibility of information among women, men, and children with disabilities in order to understand barriers to receipt, processing, and understanding of information that could be faced by persons with vision and hearing impairment, persons with psychosocial disorders or intellectual disorders, persons with reduced mobility, etc. Although the vast majority of residents of Ukraine can read and write, do not forget that some people cannot.

Therefore, it is necessary to establish what notification needs persons with disabilities have at the level of a specific community.

- Develop a uniform information material/notice and ensure that it is reproduced in different formats by means of various technologies, such as text messages, radio, television, handbooks and brochures, and advertising banners; and transmit the uniform message through different channels, including during meetings, by providers of services to persons with disabilities during their daily work with clients, etc.
- Present information in a culturally-sensitive manner, and use gender-sensitive language and/or images. Women and girls with disabilities are often not presented or engaged.

All these recommendations are not part of the legal and normative regulation in Ukraine, but they are consistent with existing rules.

Notification was performed via different channels.




Thus, respondents from the Ministry of Social Policy and the NSS noted that the heads of the facilities had been informed in separate letters of the need and priority of evacuating various vulnerable population groups, including adults and children with disabilities.

Respondents of the study, mostly from non-governmental organisations, referred to developing individual brochures and handbooks on emergency bags or recommendations on marking places for persons with hearing impairment with a “drop signal” (a representative from the NGO in Dnipropetrovsk Oblast) for persons with disabilities depending on the type of impairment. Respondents often mentioned during interviews that simple and clear information messages on evacuation were necessary for persons with disabilities. Therefore, the national authorities should develop sample handbooks and recommendations in this field, whereas local authorities should adapt them to the context of their community.

If a rule is not clear, the quality of performance is unsatisfactory. This is confirmed with findings in the survey of persons with disabilities: only 9.8% (42 persons) of respondents with disabilities answered that they had received information on displacement/evacuation from representatives of local authorities and municipal institutions. Moreover, 32.5% (67 persons) of respondents with disabilities answered that they did not have complete and accessible information on the need if displacement/evacuation, whereas 33.5% (69 persons) of respondents noted that the information was partial.

It can be concluded that the existing regulatory framework of Ukraine provides for a system for notifying and alerting persons with disabilities of evacuation during a state of emergency. However, uniform, clear, and specific information notices about people's actions during evacuation need to be developed in different formats, accounting for the needs of persons with various types of impairments, which would be clear both to children and adults.

RECOMMENDATIONS:

-  Align legislative rules in terms of notifying persons with disabilities of emergency situations and describe in detail the peculiarities of such notification, subject to the type of impairment. For this purpose, amend the Civil Protection Code of Ukraine and the Regulation on the Organisation of Notification of the Threat or Occurrence of Emergencies and the Organisation of Communications in the Field of Civil Protection approved by Resolution of the Cabinet of Ministers of Ukraine No. 733 of 27 September 2017.
-  Develop information materials/notices regarding evacuation in different formats, accounting for the needs and peculiarities of information perception by persons with disabilities and with different types of impairments, of any age, so that information will be accessible to everyone.
-  Engage persons with disabilities and/or organisations acting on their behalf in developing information notices and disseminating information via the communication channels they use, including parental groups, social media, and chats of persons with disabilities, etc.

MODULE 4 EVACUATION AND TRANSPORTATION ROUTES

It is prescribed by the legislation⁵² that equipment for evacuation assembly points, receiving evacuation points, intermediate evacuation points, points for getting on and off, and evacuation routes shall be planned accounting for the needs of persons with disabilities and other reduced-mobility population groups.

The evacuation assembly points are designated for assembling and registering evacuated persons and for organising their carriage (relocation) to safe areas; they are located in the vicinity of railway stations, sea and river ports, piers, evacuation routes, as well as at city squares, open safe places, or safe premises.

In urgent cases, the functions of evacuation assembly points are performed by operational groups by the decision of the evacuation commission chairperson.

Evacuation assembly points establish the number of evacuated persons and the procedure for their departure; organise assembly and registration, assign seats in vehicles, form walking and road convoys, inform the evacuation commission of departure, and organise medical aid to evacuated persons and protection of public order.

Essential services for victims are performed during emergency situations as well as hostilities (military operations) or as a result of such operations.

Intermediate evacuation points are located at the external border of an area of an emergency situation.

The quantity, numbers, locations, and lists of the areas where intermediate evacuation points are situated are determined by the Council of Ministers of the Autonomous Republic of Crimea, local state administrations, and local self-government bodies.

Receiving evacuation points are established to receive and register evacuated persons and to send them to places of permanent (temporary) accommodation (preservation) in safe areas.

Available vehicles from the corresponding administrative territory are involved in the general evacuation of the population; and where there is an immediate threat to people's life or health, vehicles of economic operators and citizens are additionally used.

52 Order of the MIA of Ukraine No. 579 of 10.07.2017 "On Approving the Guidelines on Planning Evacuation Activities".
<https://zakon.rada.gov.ua/laws/show/z09338-17#Text>

Additional vehicles are engaged during partial evacuation of the population by the decision of the local state administration or the official authorised to take such decisions.

The quantity, kinds, and types of vehicles to be engaged in evacuation of the population from an area of an emergency situation or areas of possible hostilities are determined by the authority that has decided to engage the vehicles.

Planning transport support for evacuation activities includes preparing vehicles to carry persons with disabilities being evacuated and the persons who accompany them.

The period for deployment and preparation of evacuation bodies at all levels for work shall not exceed four hours after a decision on evacuation is received.

The Ministry for Reintegration of the Temporarily Occupied Territories is the main executive authority in charge of forming and implementing public policy for protecting the rights of persons who are displaced on an involuntary basis (deported) and the coordinator of activities performed to organise humanitarian corridors to evacuate civilians, the injured, and the deceased from temporarily occupied territories⁵³. However, neither the resolution of the Government that has given the Ministry its corresponding powers⁵⁴ nor other legal and normative acts on evacuation of the population⁵⁵ mention or duly describe (the legislative clauses on these matters are of an excessively general nature) the need of authorities to consider the needs of persons with disabilities during evacuation, including those via humanitarian corridors. In order to ensure the rights of persons with disabilities during evacuation, including via humanitarian corridors, the special basic needs of such persons, including the need for accommodated infrastructure, transport, and accommodation facilities, equipment for persons with reduced mobility to get on and off a vehicle, etc., need to be clearly determined and satisfied.

In its written response, the SES refers to a lack of adequately equipped ramps at assembly points: *“vehicles do not always have the means for such persons who are unable to arrive at an assembly points on their own to get on and off, or there are not enough of them.”*

53 Resolution of the Cabinet of Ministers of Ukraine No. 740 of 28 June 2022 “Certain Matters of Protecting the Rights of Deportees and Internally Displaced Persons”.

54 *ibid.*

55 Resolution of the Cabinet of Ministers of Ukraine No. 841 of 30 October 2013 “On Approving the Procedure for Evacuation in Case of the Threat or Occurrence of Emergencies” and Order of the MIA of Ukraine No. 579 of 10 July 2017 “On Approving the Guidelines on Planning Evacuation Activities”.

Respondents of the study from non-governmental organisations, as well as representatives of the humanitarian headquarters and SES bodies, often mentioned the following:

- lack of vehicles to carry persons with disabilities, specifically, those in wheelchairs:
“There were not enough vehicles, including coaches/buses, which turned out to be inaccessible for persons with disabilities, specifically, those in wheelchairs,” said a representative of an NGO.
- lack of physical surrounding facilities that could be used to establish evacuation assembly points, evacuation receiving points, intermediate evacuation points, and points to get on/off vehicles:
“In fact, most corresponding facilities turned out to be absolutely inaccessible in terms of architecture both inside (including rest rooms, toilets, shower units, etc.) and outside the buildings, and had the surrounding area full of barriers,” said a representative of an NGO.

Therefore, the top priority is to ensure proper equipment for vehicles and infrastructure facilities to create a barrier-free environment for the evacuation of reduced-mobility persons with disabilities.

According to the Guidelines on Planning Evacuation Activities⁵⁶, evacuation plans contain information on the installation of special equipment in vehicles for persons with disabilities to get on (off) and be carried. The Guidelines do not specify what kind of equipment. If it is unknown what kind of equipment, this clause can be interpreted at one’s own discretion; so there is no consistent introduction of barrier-free access to carriage for reduced-mobility persons at the local level. Installation of automatic wheelchair lifts is known to take a lot of time and funds. Moreover, such lifts can be installed in a limited number of vehicles.

The legal and normative acts do not provide for, but still do not forbid, engaging persons with disabilities and/or organisations acting on their behalf, and entities that provide work or services to persons with disabilities in the evacuation and carriage of persons with disabilities, logistics of applicable processes, and preliminary selection and examination of infrastructure facilities used during evacuation. At the same time, respondents being interviewed told about the efficient evacuation and carriage of persons with disabilities during martial law in 2022 by volunteer and NGO efforts.

56 Guidelines approved by Order of the MIA of Ukraine No. 579 of 10 July 2017.

The respondents mentioned that the role of “special accommodation” vehicles to carry persons with reduced mobility had been performed by the volunteers, who would just carry persons from home to vehicles and from vehicles to coaches. Transportation also depended heavily on a person’s specific disability: whether he or she could sit or only lie in a vehicle, etc.

In some coaches, persons could just be lying on seats if the train had not been accommodated to carry persons with disabilities. It was very difficult to go to the toilet in non-specialised trains, so the people had to go without toilet for ten to twelve hours,” according to the Report “24.02 Evacuation of People with Disabilities”⁵⁷.

Persons with disabilities were mostly carried by the following types of vehicles:

- own vehicles or vehicles belonging to relatives, friends, acquaintances, or hired vehicles;
- buses mostly provided by non-governmental organisations and volunteers, sometimes with support from local self-government bodies;
- private minivans for a fee;
- specialised ambulances (least frequently);
- trains.

Participants in focus group interviews and representatives of public and local authorities noted that the evacuation had been mostly performed with ordinary or school buses, which unfortunately failed to meet the principles of a barrier-free environment and were not accommodated to carry persons with disabilities. For that reason, bedridden persons had to be put down in aisles of such buses; when there were no stretchers, they were carried there on blankets, mattresses, or sheets.

However, according to written responses from the SES, *“the SES has received no statements regarding failure to consider the needs of persons with disabilities during their evacuation, and there is no information on this matter from the regions.”* This situation means that there is no feedback on considering the needs of persons with disabilities, and that the SES must introduce monitoring of this matter.

57 24.02 Evacuation of People with Disabilities. Analytical Report. Fight for Right NGO. 2022.

At the same time, it was mentioned by some of the respondents being interviewed that it was sometimes possible to evacuate persons with disabilities by specialised motor vehicles. In most cases, specialised motor vehicles were only provided by international partners:

“The Italian partners sent specialised buses accommodated to carry children and persons with disabilities... they are more experienced in the evacuation of such persons. They are also better-equipped: various assistive products to move persons with reduced mobility,” said a representative of a humanitarian headquarters in Lviv Oblast.

“We are also using buses from the Israeli community, and they are adapted for persons with disabilities. They have beds, special lifts so that a person with mobility impairment can get on a bus, get into a vehicle. They have special safety belts. Their seats are not just fold-back ones; their angle can be changed, and there is a table... Unfortunately, we do not have such buses in Ukraine yet.”⁵⁸

Although Ukrzaliznytsia JSC informed that it had fifteen coaches adapted to the needs of persons with disabilities, that quantity turned out to be insufficient for such mass evacuation. During focus group interviews, representatives of non-governmental organisation and officials emphasised that railway stations had no mobile lifts, and evacuation trains had often lacked such built-in lifts, so persons in wheelchairs had to be lifted into and lowered down by four to six railway station workers, SES, police officers, volunteers, or municipal workers; and the bedridden persons had to be carried into and out of coaches on mattresses. As there was no support and there were crowds at the railway station, some group members got lost and could not get on the train.

At the same time, where it was possible, railway stations created additional conditions for persons with reduced mobility to get around. Thus, a representative of an NGO from Kharkiv Oblast who helped evacuate persons with disabilities noted that there had been an individual coach for a group of persons with disabilities, and they had got on the train from a separate platform to avoid crowds. Another representative of an NGO who took care of persons with vision impairment referred to the practice of creating special corridors to get around a platform and get on the train.

58 According to the Analytical Report “24.02 Evacuation of People with Disabilities”, Fight for Right NGO. 2022.

There is an example of a comprehensive approach in Kryvyi Rih, where the representatives of Ukrzaliznytsia and NGOs are directly involved: *When the quantity of requests reached a specific level (the coach could be filled), a non-governmental organisation submitted a request to Ukrzaliznytsia and international organisations for the placement of a specific number of persons accounting for their needs. While making the lists, we additionally called the people and found out whether they could be accompanied, had pets, and had confirmation documents to cross the border. The volunteers picked the people up from their home in minivans and took them to the railway station; another group of volunteers helped them get on the coach. They often carried people in their arms because some trains had no lift. Volunteers were also involved in accompanying the people abroad; For instance, two volunteers and a health care professional to accompany a group. Non-governmental organisations also tried to provide packed meals for the trip. Ukrzaliznytsia, which was a key actor in transporting the evacuated, took part in providing accommodations and Ukrposhta's financial assistance programme after the trip⁵⁹.*

During the focus group discussion, representatives of NGOs and persons with disabilities mentioned the difficulties caused by a lack of desire of persons with disabilities to leave since such evacuation often had been performed without a specific direction and destination — people were just fleeing the war. Refusal to be evacuated was mentioned by participants from Dnipropetrovsk, Luhansk, Kherson, Chernihiv, and other oblasts. People refused to leave either by bus or by train.

When Kherson became a dangerous place, we offered evacuation three times during the second half of March. We offered evacuation to families who had children with autism as they needed special treatment. Support by their relatives was vital, and they had difficulty getting used to changes in their surroundings. For the first time, only three families were ready to leave out of more than eighty families who had given their preliminary consent to evacuation; there were few of them the second time as well. It was a very hard trip; there were no stops, we were all wearing diapers and had minimum belongings. In some cases, the occupational soldiers forbade private carriers to drive through, and we had to return after many hours of driving. It was extremely exhausting. We left only during the third stage of evacuation. The people were mostly evacuated abroad. From an interview with the head of a civil society organisation, and mother of a child with cognitive impairment (autism) from Kherson.

59 24.02 Evacuation of People with Disabilities. Analytical Report. Fight for Right NGO. 2022.

The parents and relatives of children and adults with intellectual and mental disorders told those who were under their care that they were going on a trip or quest (not to disturb their mental condition).

Sometimes the people had to wear two pairs of diapers regardless of disabilities since the evacuation took six to twenty-four hours, with mines planted along the roads or shells and other explosives scattered around. People sometimes had to leave their electric wheelchairs since those assistive products would not fit into evacuation vehicles.

As most of the physical surrounding facilities and vehicles were not adapted to the needs of persons with disabilities, some officials suggested that persons with disabilities and other reduced-mobility population groups should be evacuated before an emergency situation.

Lack of physical surrounding facilities and vehicles accessible to persons with disabilities, specifically those in wheelchairs, to get around and be carried, results from many years of authorities disregarding the clauses of the UN Convention on the Rights of Persons with Disabilities and the Law of Ukraine “On the Fundamentals of Social Protection of Persons with Disabilities in Ukraine” and constitutes a violation of rights and discrimination against this category of persons. Inaccessibility of most physical surrounding facilities is demonstrated by the rating of the oblast, Kyiv city state administrations by the degree of barrier-free physical surrounding facilities and services (based on the results of monitoring in 2021) published on the MCTD website⁶⁰. Monitoring was performed by MCTD in accordance with the Procedure for Monitoring and Assessment of the Degree of Barrier-Free Physical Surrounding Facilities and Services for Persons with Disabilities⁶¹.

60 Rating of the oblast, Kyiv city state administrations by the degree of barrier-free physical surrounding facilities and services (based on the results of monitoring of 2021). https://www.minregion.gov.ua/wp-content/uploads/2022/01/prezentacziya_2021.pdf

61 Resolution of the Cabinet of Ministers of Ukraine “On Approving the Procedure for Monitoring and Assessment of the Degree of Barrier-Free Physical Surrounding Facilities and Services for Persons with Disabilities” No. 537 (2021). <https://zakon.rada.gov.ua/laws/show/537-2021-%D0%BF#Text>

RECOMMENDATIONS:

- ✓ Introduce legislative standards for accessibility to be met by evacuation assembly points, evacuation receiving points, intermediate evacuation points, points to get on/off vehicles, railway/bus infrastructure facilities (railway/bus stations, platforms, etc.), the surrounding territory, and vehicles, including coaches and buses that are planned to be used during an emergency situation to carry persons with disabilities, especially those in wheelchairs or bedridden persons.
- ✓ Engage persons with disabilities and/or organisations acting on their behalf, and entities that provide work or services to persons with disabilities (upon their consent) in the evacuation and carriage of persons with disabilities, logistics for applicable processes, and preliminary selection and examination of infrastructure facilities used during evacuation; develop guidelines on engaging persons with disabilities and/or organisations acting on their behalf, and entities that provide work or services to persons with disabilities (upon their consent) in:
 - evacuation and transportation of persons with disabilities, and logistics of respective processes;
 - examination/determination of barrier-free environment and adaptation of evacuation assembly points, evacuation receiving points, intermediate evacuation points, points to get on/off vehicles, railway/bus infrastructure facilities (railway/bus stations, platforms etc.), and the surrounding territory;
 - determination of vehicles, including coaches/buses that are planned to be used during an emergency situation to carry persons with disabilities, especially those in wheelchairs or bedridden persons.
- ✓ Determine and approve a legislative mechanism and sources of funding examination/determination of a barrier-free environment and adaptation of the evacuation assembly points, evacuation receiving points, intermediate evacuation points, points to get on/off vehicles, railway/bus infrastructure facilities (railway/bus stations, platforms, etc.), and the surrounding territory.
- ✓ Provide for sufficient funding to purchase vehicles (including coaches and school buses) accessible to persons with disabilities, especially those in wheelchairs.

MODULE 5 ACCESSIBILITY OF SHELTERS / ACCOMMODATION AFTER EVACUATION

According to the regulatory framework⁶², a plan for hosting and accommodating evacuated persons in a safe area has to contain a separate section on the hosting and accommodation of persons with disabilities, which specifies:

- estimated number of the persons with disabilities arriving, by stations of arrival and evacuation receiving points;
- lists of buildings and structures of the social protection facilities and private houses that are most convenient to accommodate persons with disabilities;
- estimated quantity and allocation of vehicles to meet and carry evacuated persons with disabilities from the station (point) of arrival to evacuation receiving points and further to their accommodation;
- list of social protection bodies and healthcare institutions in the safe area.

Essential services for victims constitute creating and maintaining conditions that are at least necessary to preserve the population's life and health in areas of emergency situations, along evacuation routes, and at accommodations for evacuated population, based on the established norms and standards; and includes provision of water, food, living essentials, place for temporary stay, medical devices, medicines, and utility and household services, as well as transport and information support.

When essential services for an evacuated population are planned (including providing water, living essentials, accommodation, medical services and devices, utility and household services, transport, and necessary information), the needs of persons with disabilities must be considered to the maximum extent. The types and standards of the property, as well as the types and volumes of the services of essential services for victims, are established by the Cabinet of Ministers of Ukraine; while the local self-government bodies organise essential services for victims in their territory.

The immediate essential services for victims are provided by efforts and means of the corresponding specialised civil protection services of the Autonomous Republic of Crimea, oblasts, cities of Kyiv and Sevastopol, districts, and territorial communities. Essential services for victims are provided by the efforts and means of the central executive authorities and rescue services.

62 Order of the MIA of Ukraine No. 579 of 10 July 2017 "On Approving the Guidelines on Planning Evacuation Activities".

The procedure for accommodating evacuated populations is established by the Council of Ministers of the Autonomous Republic of Crimea and the local state administration in the territory of which the evacuated population is planned to be accommodated, based on the request of the authority that takes a decision on evacuation.

Evacuated persons are accommodated in hotels, health resorts, boarding houses, summer camps for children, and buildings of enterprises, institutions, and organisations of any ownership form that are usable as accommodation.

Based on information from local state administrations and local self-government bodies on residence of foster families, family-type orphanages, foster parents, facilities for 24/7 stay of children, the NSS determines the foster families, family-type orphanages, foster parents, facilities to which orphans, children deprived of parental care, children left without parental care will be evacuated taking into account of their age and health.

IDPs with disabilities (both adults and children) are paid a monthly assistance of UAH 3,000 per person. Other IDPs are paid UAH 2,000 per person⁶³. The amount of compensation for expenses for temporary accommodation (stay) for internally displaced persons, both with and without disabilities, is the same and equated to UAH 14.77 per day; and equals UAH 30 during the period from 1 October 2022 until 31 March 2023⁶⁴. Although most of the accommodation where persons with disabilities are hosted after their evacuation needs to be additionally adapted, which requires additional funding, the amount of the compensation needs to be increased for the accommodation where persons with disabilities are hosted. In other words, the needs of persons with disabilities being evacuated, let alone the need to adapt their living conditions, are not considered by the Procedure and need to be regulated. It should be taken into consideration that persons with reduced mobility and persons with disabilities in wheelchairs have difficulty finding barrier-free private housing to rent, including due to the fact that accommodation with accessible architecture is usually located on newly-built or high-comfort houses, which are rented at higher prices.

Accommodating persons with disabilities and other reduced-mobility population groups turned out to be one of the major challenges for hosting communities.

63 According to Resolution of the Cabinet of Ministers of Ukraine No. 332 of 20 March 2022 "On Approving the Procedure for Paying Housing Benefits to the Internally Displaced Persons".

64 According to Resolution of the Cabinet of Ministers of Ukraine No. 333 of 19 March 2022 "On Approving the Procedure for Compensating for Expenses for Temporary Accommodation of the Persons Internally Displaced during the Martial Law.

Inaccessibility of most physical surrounding facilities even before the full-scale invasion in 2022 is demonstrated by the rating of the oblast, Kyiv city state administrations by the degree of barrier-free physical surrounding facilities and services (based on the results of monitoring in 2021) published on the MCTD website⁶⁵, according to which most buildings and structures at railway stations, bus stations, healthcare institutions, educational establishments, and civil protection facilities turned out to have barriers.

During an interview, respondents informed researchers about the lack of sufficient quantity of premises to host evacuated persons; whereas the facilities where evacuated persons were actually accommodated turned out to be mostly inaccessible for persons with disabilities in terms of architecture both inside (including rest rooms, toilets, shower units, etc.) and outside the buildings, and had a surrounding area full of barriers.

The matter of accommodation was especially pressing for evacuated persons with disabilities and the elderly, who needed special care and living conditions. They are mostly vulnerable categories and include persons with disabilities and/or the elderly who live alone (have no family or have been abandoned by their family) and who do not get around (bed bound) or get around in a wheelchair, and/or have mental or intellectual disorders, etc. They have lost accommodation and/or are unable to provide themselves with accommodation on their own. These people include a very large number of insulin-dependent persons and persons who have lost their Ukrainian national passports and other documents. This category is evacuated chaotically, in the “manual” mode.

Such people get to the centre (shelter) for collective temporary accommodation of persons with disabilities established in Dnipro by the NGO Centre of Social Adaptation of Persons with Disabilities “Ocean of Good”. The Centre was established by the civil society organisation at its own initiative on municipally-owned premises, with support from the Head of the Dnipro Defence Headquarters, and is funded by charitable organisations and donors. The Centre performs the function of a temporary shelter for evacuated persons of old age and persons with disabilities, where they can take a rest and recover before they continue their trip to the west. According to a Centre representative, persons with reduced mobility can be provided support and rehabilitation social services, and the period of such persons’ stay varies from several days to more than a month.

65 Rating of the oblast, Kyiv city state administrations by the degree of barrier-free physical surrounding facilities and services (based on the results of monitoring by the MCTD in 2021). https://www.minregion.gov.ua/wp-content/uploads/2022/01/prezentacziya_2021.pdf. The corresponding monitoring was performed by the MCTD in accordance with the Resolution of the Cabinet of Ministers of Ukraine No. 537 of 26 May 2021 “On Approving the Procedure for Monitoring and Assessment of the Degree of Barrier-Free Physical Surrounding Facilities and Services for Persons with Disabilities”.

The Centre is established at a healthcare institution and has more than 100 beds. Sixty of them are orthopaedic and adapted to the needs of persons with disabilities⁶⁶.

For further relocation, the shelter coordinates its activities with executive authorities, which provide lists of healthcare institutions in the western regions of the country that can offer accommodation to persons in the Centre (shelter). However, these institutions are mostly located in urban-type settlements and villages. It was established during conversations with chief medical officers of those healthcare institutions that the institutions that were supposed to host the persons from the Centre (shelter) did not have: hot running water; shower units; a sufficient quantity of beds; necessary staff; architectural accessibility; a sufficient quantity of toilets and accessible toilets in terms of architecture; insulin for such persons; or, adequate heating for long-term stay in autumn and winter. Taking into account the above-mentioned conditions, these institutions are unsuitable for persons from the Centre (shelter). As persons with disabilities and reduced-mobility population groups are not sick, and most of them can take care of themselves and run a household, the NGO Centre of Social Adaptation of Persons with Disabilities “Ocean of Good” asked the authorities to find other more suitable accommodation options (rather than hospital beds) for the affected persons.

Another example of a temporary shelter for persons with disabilities is a shelter for IDPs established by the humanitarian response headquarters in Lviv Oblast. According to the Head of the Lviv OMA, there is a centre that helps internally displaced persons at Arena Lviv; to find accommodation or a vehicle, or to take a rest and get warm before going further to the West⁶⁷. More than 11,000 IDPs, including over 2,000 persons with disabilities, found shelter from March to September 2022 at Arena Lviv. The humanitarian response headquarters provided mobility aids (wheelchairs, crutches, etc.) and basic medical equipment (blood pressure and glucose monitors) as needed. Most aids were provided by international humanitarian organisations, volunteers, and foreign partners. The research team visited the humanitarian headquarters on 7 October 2022 during the study. The shelter is located at the stadium, which has recently been reconstructed in accordance with the standards of a barrier-free environment; so the premises have been adapted for persons with disabilities: there are wheelchair ramps and toilets. Owing to cooperation with foreign partners, members of the parliament, and private patrons, the shelter offers meals, provides wheelchairs, has 24/7 social support, consults on issue of documents necessary to go abroad, and grants medical and psychological aid.

66 <https://dv-gazeta.info/dnepnews/v-dnepre-nachal-rabotu-tsentr-dlya-pereselentsev-s-invalidnostyu.html>

67 <https://old.loda.gov.ua/news?id=66021>

During the interviews and focus group discussions, representatives of rehabilitation centres and non-governmental organisations suggested using state rehabilitation centres, health resorts, and state prosthetics and orthopaedic enterprises in safe regions as accommodation for evacuated persons with disabilities, provided that they were granted additional funding. However, during martial law, the Ministry of Social Policy and other public authorities prepared a number of resolutions on reorganising such legal entities and subordinating thereof to the State Property Fund of Ukraine. The enterprises producing and repairing assistive rehabilitation products for persons with disabilities were excluded from the list of facilities that were not subject to privatisation⁶⁸. On 14 October 2022, the Government transferred health resorts and state prosthetics and orthopaedic enterprises, which were an element of the rehabilitation system, from the jurisdiction of the Ministry of Social Policy to the jurisdiction of the State Property Fund of Ukraine. As a result, such changes in subordination are performed before enterprises are privatised. In connection with the above, representatives of rehabilitation centres and non-governmental organisation assessed the actions of public authorities negatively.

The website <https://prykhystok.gov.ua> was developed with support from the Ministry of Digital Transformation and the MCTD for internally displaced persons to find private accommodation. The website did not have an option for persons with disabilities to search for accommodation for a long time. In this regard, the All-Ukrainian Civil-Society Organisation “National Assembly of Persons with Disabilities of Ukraine” applied⁶⁹ to Government Commissioner for the Rights of Persons with Disabilities T. V. Barantsova, and the function was added to the website in October 2022. Analysis of the private accommodation offerings for displaced persons with disabilities as of 10 October 2022 found 48 places for persons with disabilities in different regions, but they contained no information on whether those places were accessible to persons in wheelchairs in architectural terms.

The initiative to create such a website for search is a useful information resource that helps find temporary shelter, including for persons with disabilities, privately, but it does not represent information on accessible locations for temporary accommodation that were offered by local authorities. The need to develop such a register was mentioned by representatives of NGOs that evacuated organised groups of persons with disabilities.

68 Law of Ukraine No. 2466-IX of 27 July 2022 “On Amending the Law of Ukraine ‘On Privatisation of the State and Municipal Property’ as regards Amendments to Certain Clauses and Promotion of Investment during Privatisation”.

69 Letter No. 223/3 of 30 August 2022.

“The main problem is lack of any information or register on which communities are ready to host persons with disabilities, where they can be brought. We contact the local self-government bodies on our own and ask whether they can accommodate the persons we are evacuating. It takes lots of time and effort. At the beginning of the war, many community heads made advances and provided premises for temporary accommodation in schools and other establishments, but there are no premises now. The oblasts are overcrowded. People keep migrating, so we need the register that would monitor where people can be accommodated. It is very difficult to accommodate persons with disabilities at premises adapted to their needs,” said the representative of an NGO from Kharkiv Oblast. Therefore, the need to introduce a register of premises for the evacuated that are adapted to the needs of persons with disabilities remains a pressing issue.

Volunteering initiatives and non-governmental organisations played a major role in providing accommodation to evacuated persons with disabilities, including persons with disabilities, during martial law in 2022. For instance, the National Assembly of Persons with Disabilities of Ukraine raised funds from international donors and used them to support ten regional centres for temporary accommodation (for IDPs with disabilities and their families, parents raising children with disabilities, and the elderly) and mobilisers (activists from among persons with disabilities) who helped evacuate persons with disabilities at the local level. CO “Doctors without Borders” have a medical evacuation train. CF “VostokSOS” even specialises in evacuating reduced-mobility population groups although they do not have vehicles with a lift. Numerous civil society associations of persons with disabilities created groups on social media and messengers, and coordinated their work to assist people with evacuation and accommodation.

Some representatives of charitable, volunteering, and civil society organisations noted that the probable reason for a more active volunteer movement was that public authorities did not deal with the matters of civil protection and evacuation of persons with disabilities at all, as persons with disabilities mostly applied to non-governmental organisations if they were unable to leave on their own.

At the same time, legal and normative acts do not provide for, but still do not forbid, engaging persons with disabilities and/or their representatives in organising temporary accommodation to which persons with disabilities are evacuated.

Taking into account the considerable experience of evacuating persons with disabilities, legal and normative acts must provide for engaging persons with disabilities and/or organisations acting on their behalf, entities that provide work or services to persons with disabilities, and hosting communities must facilitate engagement of such representatives in:

- developing a plan for receiving and accommodating the evacuated population in a safe area;
- making lists of stations for evacuation arrival and receiving points;
- making lists of buildings and structures and private houses that are most convenient to accommodate persons with disabilities;
- making lists of vehicles to meet and carry evacuated persons with disabilities from a station (point) of arrival to evacuation receiving points and further to their accommodation;
- timely determining and examining the architectural accessibility of buildings and structures and the accessibility of vehicles used for evacuation.

Given the above, a conclusion can be made that accommodation of the evacuated population in safe territories is associated with a considerable list of problems, let alone the accommodation of evacuated persons with disabilities: lack of accessible premises for accommodation in architectural terms, lack of any housing for the evacuated, no registers of the needs of evacuated persons with disabilities, etc.

RECOMMENDATIONS:

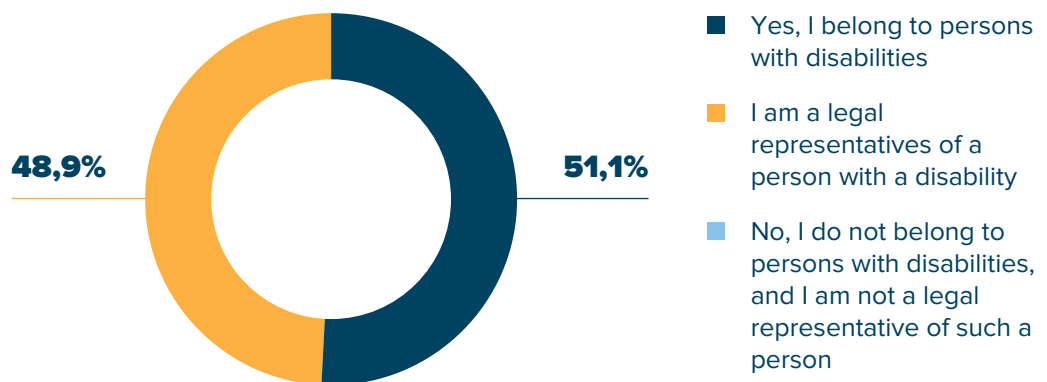
- ✓ Include the mandatory requirement for architectural accessibility of all buildings and structures used to accommodate the evacuated into legal and normative acts that regulate the processes of accommodating evacuated persons with disabilities⁷⁰. Oblige local self-government bodies to ensure accommodation of the evacuated at accessible premises.
- ✓ Regulate engagement of persons with disabilities and/or organisations acting on their behalf, and entities that provide work or services to persons with disabilities (upon their consent) in:
 - developing a plan for receiving and accommodating the evacuated population in a safe area;
 - examining and assessing barrier-free buildings and architectural structures and further adapting stations of evacuation arrival and receiving points;
 - determining vehicles to meet and carry evacuated persons with disabilities from the station (point) of evacuation arrival to receiving points and further to their accommodation.
- ✓ Determine and approve at the legislative level the mechanism and sources of funding for:
 - examining and assessing a barrier-free environment and further adapting stations at evacuation arrival and receiving points, buildings, and structures that are most convenient to accommodate persons with disabilities, and the surrounding area;
 - essential services for the evacuated population, including the provision of water, living essentials, accommodation, medical services and devices, utility and household services, transport, and necessary information, accounting for the needs of persons with disabilities considered to the maximum extent.
- ✓ Increase by two fold the amount of compensation for expenses for temporary accommodation (stay) for internally displaced persons with disabilities.
- ✓ Improve the search for accommodation for persons with disabilities at <https://prykhystok.gov.ua> so that it will be clear whether it is accessible in architectural terms.
- ✓ Develop a register of premises for the temporary accommodation of evacuated persons and housing available for internally displaced persons with disabilities.

70 In accordance with the State Construction Standard "Inclusive Buildings and Structures" B.2.2-40:2018. <https://dreamdim.ua/wp-content/uploads/2019/03/DBN-V2240-2018.pdf>

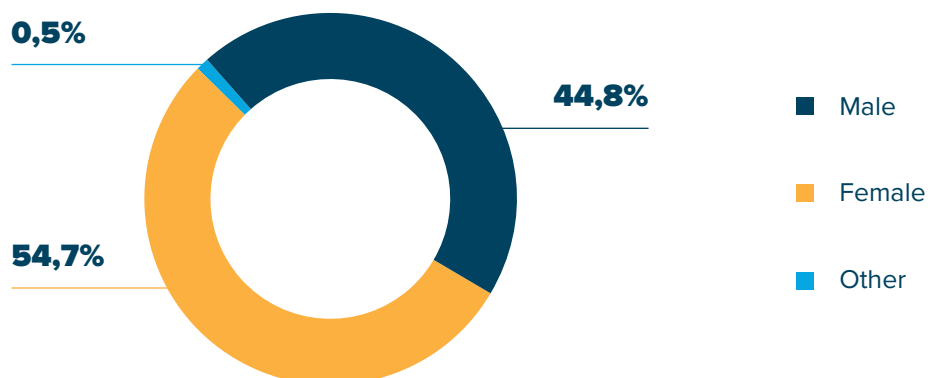
SECTION 3.

Findings from the Survey of Persons With Disabilities Who Have Been Evacuated on Their Own or With their Legal Representatives

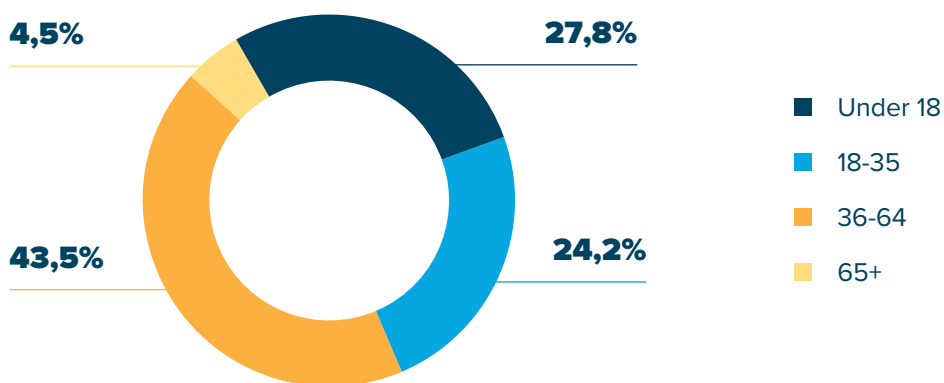
223 respondents took part in the survey by completing the Google Form from 16 October 2022 to 7 October 2022. 51.1% belonged to the category of persons with disabilities, and 48.9% were legal representatives of persons with disabilities.



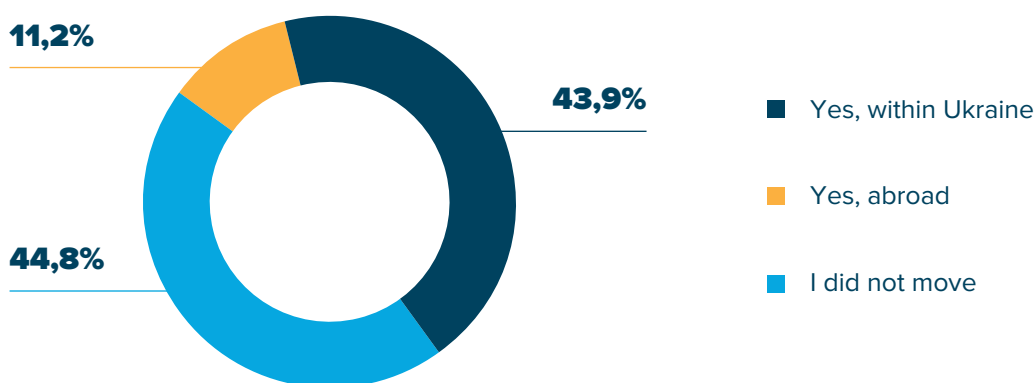
54.7% women and 44.8% men took part in the study, and one person specified his or her category as “other”.



Representatives of all age groups participated in the study, including 27.8% representatives of children with disabilities younger than eighteen.



44.8% of the surveyed persons with disabilities and/or their representatives were evacuated abroad. Almost the same number of people (43.9%) were evacuated within Ukraine.



Before the evacuation, 193 respondents had lived in their own housing, and eighteen respondents had rented their housing. Thus, the majority of the surveyed, more than 90%, did not stay in facilities and, therefore, took a decision to evacuate on their own (55%) or under relatives' advice (35%).

25 respondents (or, 11.2%) could not be evacuated and stayed in their housing; half of these stayed in regions where there were or still are active hostilities: Kharkiv, Dnipropetrovsk, Sumy, and Kyiv Oblasts.

“I still have not made a decision on evacuation. I have nobody to consult, and there is nobody to accompany me (a person who can hear) if I must leave. I cannot travel alone, especially abroad, due to hearing impairment (the hearing aid does not enable me to understand every word they say). Audio information is almost inaccessible, and nobody of those who can hear wish to write explanations (there are no subtitles). A person with a hearing disability falls victim to the circumstances,” said a respondent with hearing impairment.

“I am not going anywhere. I feel like ‘in a hole’ at home,” said an elderly man with hearing impairment in Kyiv Oblast.

“We had spent all the time sitting in our basement until the soldiers came and gave us twenty minutes to leave the house. There was no public transport, and people could only get around by their cars. We had to walk – our car battery died - and nobody helped us. Then we went to our relatives and stayed in their basement. We had no idea where and when an evacuation was performed. We needed accompaniment, but nobody accompanied me. We still face biased attitude. There was no accommodated transport, no information on how we could leave; we were afraid to be shelled, and there was no accompaniment on the way,” said the representative of a child with a disability and reduced mobility from Luhansk Oblast.

Most persons with disabilities were evacuated by car — 48.9%, by train — 31.8%, and by bus — 22%.

At the same time, some people were evacuated on foot, by boat, minivan, truck, ambulance, etc.

None of the persons surveyed said that they had been helped by the public authorities to get to a vehicle.

The fuel problem that emerged after the enemy had destroyed fuel stations and their infrastructure caused a massive collapse on the road and the impossibility and the high price of getting to the railway transport.

57 out of 223 persons noted that they had difficulty walking or going up stairs.

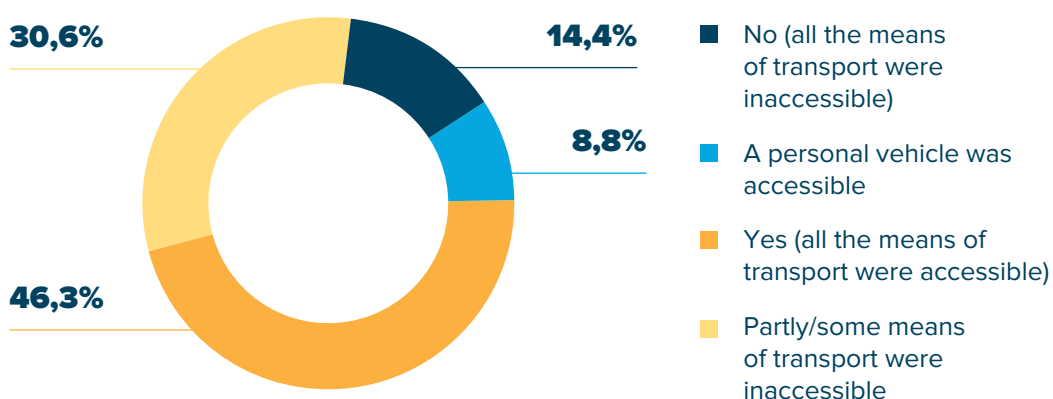
43 said that they had been evacuated by train, and almost half (20 respondents) mentioned accessibility difficulties:

“A person in a wheelchair who does not walk has a great difficulty getting on a train when there is help and cannot do it on his or her own at all. Everything was done with the help of the child’s parents, who managed to carry the six-year-old child up very steep stairs with great difficulty. There was no help. We hardly managed to get on the train after we had come from our town to the one nearby, despite shelling, because we could not get an evacuation train any closer,” said a respondent from Luhansk Oblast.

“An inaccessible train to which I was carried, an inaccessible bus I had to catch to get to the border,” said a reduced-mobility young woman from Dnipropetrovsk Oblast.

119 persons out of 216 respondents being evacuated said that the transport was accessible; 19 of them left by their own or relatives’ car. 45% of respondents being evacuated noted that transport was either fully (14.4%) or partly (30.6%) inaccessible. Almost all the means of transport were specified as inaccessible: a train, a car, a boat, a truck, a bus, and an ambulance.

Was the transport by which you were evacuated accessible to you?



Inaccessibility of transport was also mentioned by persons who were not evacuated. Out of 25 persons who had not been evacuated, 22 persons said that the transport had been fully or partly inaccessible to them. Only three respondents who had not left said that the transport was accessible; they resided in Ivano-Frankivsk and Chernivtsi oblasts.

Therefore, accessibility of vehicles was a major barrier to the evacuation of persons with disabilities.

“I was evacuated by my own car, because there are no options for electric wheelchairs,” said a middle-aged respondent from Kyiv.

“My child has autism, so we could not take an evacuation train — they were overcrowded, and the child has difficulty being around lots of people. We left by car with our relatives,” told the father of a child with autism from Donetsk Oblast.

“We had to carry out daughter with a disability in our arms for a long time during the evacuation, because we do not have our own vehicle...,” said a female respondent from Chernihiv.

“We left Kherson with our acquaintances in a small minivan. My child is autistic. It was better for her to be surrounded by people she knew. We had no money to rent another vehicle,” said the mother of a child with disability from Kherson.

“Starting from 25 February, a person with disability could not use any public transport in practice. The public transport did not work, taxis were incredibly expensive, and it was practically impossible to get on a train with children at the railway station,” explained a man with vision impairment from Kyiv Oblast.

Transport was physically inaccessible due to hostilities and occupation.

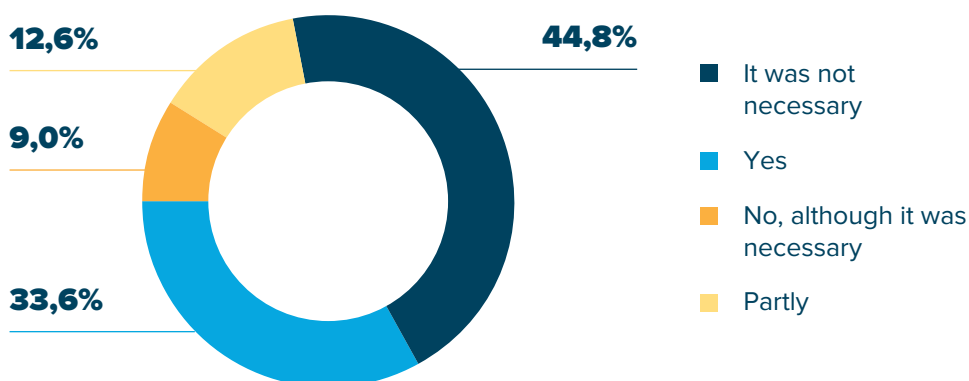
“We lived in occupation and had to get out on foot,” told a resident from Kyiv Oblast. *“The bridge across the river had been blasted, and we only managed to take a suburban electric train,”* said a woman with an autistic disorder from Kyiv Oblast.

“Irpın had no transport on which to be evacuated, and we had to walk to Romanivka bridge on our own,” told a reduced-mobility man from Kyiv Oblast.

“Evacuation from the occupied territory is much harder than from the others. Mariupol was practically unable to evacuate persons with disabilities. People could only leave by their own vehicles. Nothing has changed. People are suffering there, but they cannot leave,” told a woman with reduced mobility from Donetsk Oblast.

Many representatives of executive authorities and charitable, volunteering, and civil society organisations noted during the interview that Ukraine did not have accessible transport for evacuation. Persons in wheelchairs or bedridden persons were most affected. Moreover, lots of persons with disabilities in wheelchairs mentioned that they were carried into and out of coaches in arms, in particular, at the Lviv Railway Station, which proves that many of the railway stations do not have special lifts. As seats in evacuation buses were inaccessible and limited, the people sometimes had to be evacuated without their wheelchairs, including electrically-driven ones, whereas bedridden patients were just put in the bus aisle on a mattress.

Did anyone help you get on and off the transport by which you travelled/were evacuated?



9% of persons with disabilities informed researchers that there was no help when they were getting on and off the transport by which they had been evacuated, although they needed help. 12.6% of such persons mentioned only partial help. 20.6% of the persons with disabilities recollected that reasonable accommodation (lifting platforms, lifts, etc.) had not been used when they were getting on their evacuation transport. Even the school buses that were used for evacuation in the first place turned out to be inaccessible for persons with disabilities and other reduced-mobility population groups and had no lifts. It was unreasonable to evacuate by ambulances since no more than two bedridden persons could be placed into a vehicle.

93% of persons with disabilities were evacuated on their own or with their relatives with the help of charitable, volunteering, civil society, or religious organisations; whereas 7% of the persons with disabilities noted that they had been evacuated on their own although they needed support.

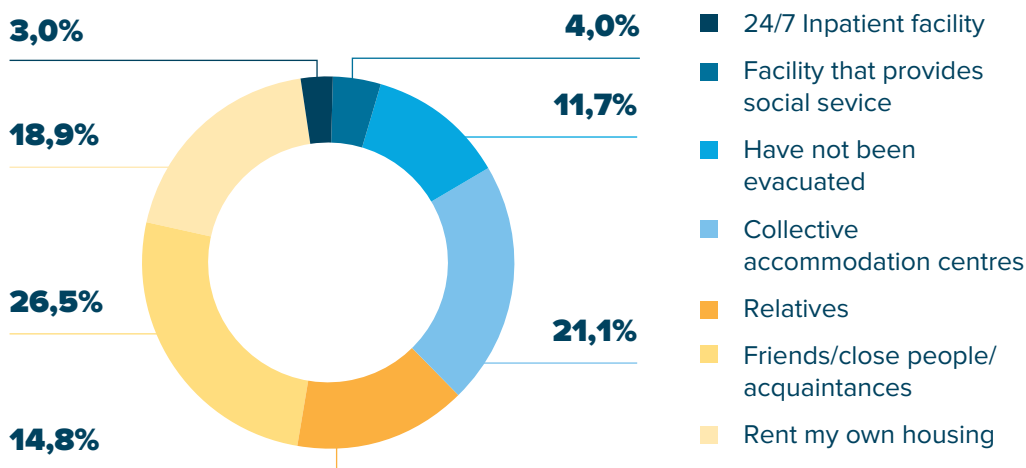
Moreover, some of the representatives of the charitable, volunteering, and civil society organisations of persons with disabilities claimed that many of the persons with disabilities could go abroad, but they had no one to accompany them, so they were unable to leave on their own and/or refused to go abroad.

Seven respondents noted that they had been evacuated from facilities (social halls of residence, boarding homes) while the others had lived in their own housing or with relatives before evacuation.

“There was information on the evacuation train from social media. We found it ourselves, but there was no information on how to get there. We did everything on our own, and it was very difficult to find a vehicle to get to the neighbouring town twenty kilometres away from ours, the town that used to be our home. Despite shelling, our acquaintances and their acquaintances helped us find a driver for a high price, for all the money we had, and he carried the child with a disability in a wheelchair and us, her parents, because there was no information, no organised evacuation of persons with disabilities from our town. The centre responsible for rehabilitation, the social protection facilities and the city council, all the entities where at least some information on evacuation could be received had left before us, and had given us no plan for saving the life of persons with disabilities,” told the mother of a reduced-mobility child in a wheelchair from Luhansk Oblast.

40.8% of persons with disabilities did not know in advance what settlement they would be evacuated to. In other words, they just left to flee the war without any arrangements. Although the hosting local authorities have to adapt collective accommodation to the needs of persons with disabilities, there are few places like that, and there is no information available. Even the website <https://prykhystok.gov.ua/find> has no option for searching for housing with architectural accessibility for persons with disabilities; whereas, the amount of compensation for expenses for the temporary accommodation (stay) of internally displaced persons in private housing is the same regardless of a displaced person’s disability. Therefore, persons with disabilities had to adapt rented private housing to their needs at their own expense since the state allocates no funds to adapt the private housing for persons with disabilities.

Where do (did) you live after the displacement/evacuation?



100 (or 44.8%) of persons with disabilities surveyed have been evacuated abroad, and almost half of them reside in collective accommodation centres: refugee camps, inpatient facilities with 24/7 stay of persons with disabilities, hotels, churches, or social housing. Fifteen of them noted that they did not have proper conditions and, although they had asked for help, they still did not get any housing adapted to their needs. One respondent informed researchers that he was forced to work in Germany, which was a gross violation of human rights.

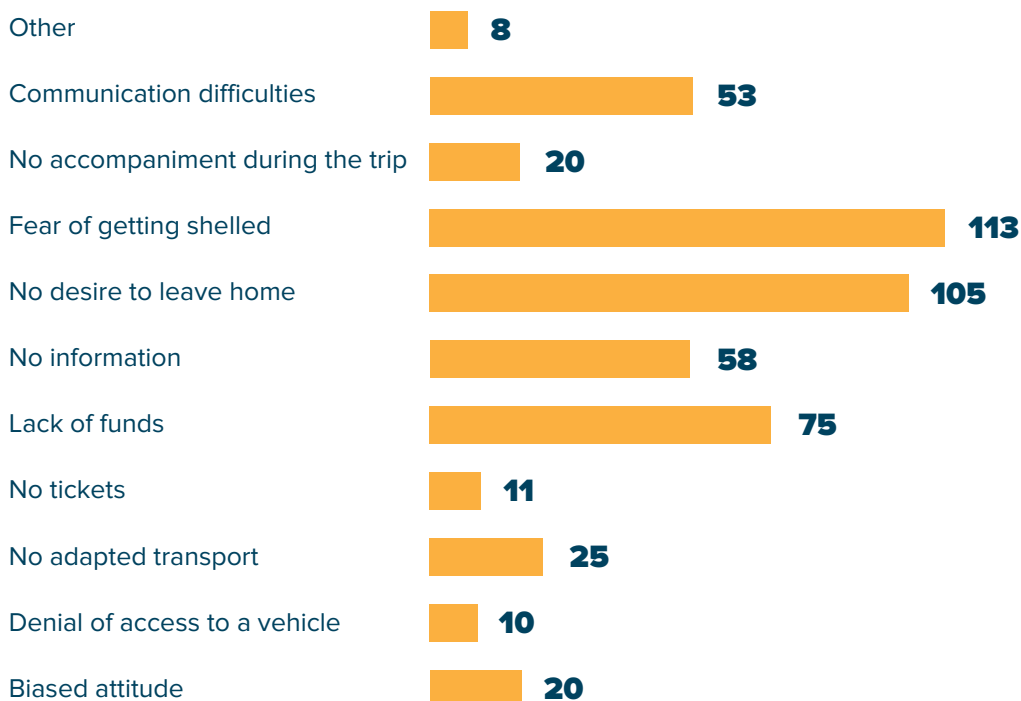
“A volunteer in Germany (Sulzbach, Saarland) forced me to work, took away my passport, the police issued me a new one... It was all over for her. Now I need backbone surgery, but I do not know who might help,” said a respondent with vision impairment from the age category of 36-64 from Donetsk Oblast.

30% of respondents with disabilities who have been evacuated within Ukraine live in unaccommodated housing after the evacuation. 12.1% of such persons asked to accommodate their housing, but it was to no effect. At the same time, according to the SES, no requests were received by the SES for changing housing unsuitable for the needs of persons with disabilities. It means that the existing mechanism for responding to rights violations of persons with disabilities needs to be improved, including by engaging respective SES units to respond to such violations during emergencies.

Respondents mentioned the following barriers/difficulties they faced during evacuation:

- social and psychological: 51% mentioned a fear of getting shelled; 47% did not wish to leave their home.
- 34% of respondents referred to financial difficulties (lack of funds).
- 26% had communication difficulties. Thus, a deaf respondent noted, *“it is difficult to communicate, and people who can hear do not always wish to explain information in writing; I need subtitles to understand 100% of the information, but they are not available.”*
- 26% told about a lack of information on how they could leave;
- 16% mentioned transportation problems, in particular: 11% noted that there was no adapted transport; 5% could not get tickets;
- 9% were not accompanied during the evacuation;
- 9% faced biased attitudes, and 4% said they had been denied access to a vehicle.

Barriers during evacuation



Selected quotes about difficulties:

- *“Ukraine has no accommodation (hotels) or other places to spend a night for persons with severe disability in an electric wheelchair.”*
- *“no information on the point of destination, fear of the unknown. Poor health after the long trip”*
- *“long queues at gas stations”*
- *“lots of transfers”*
- *“pain, despair, being at a loss, no sleep and proper meals, no understanding how to live on”*
- *“At the Ukraine border, the officials refused to let skip the line. As a result, we were up for fifteen hours, and both me and my child caught a cold.”*

CONCLUSIONS

The findings from the survey of persons with disabilities have demonstrated that many of the persons with disabilities had to be evacuated on their own because of the war from February to September 2022 because the existing evacuation system of Ukraine turned out to be ineffective. Available transport and accommodation are mostly unsuitable for evacuation of persons with disabilities; in particular, the transport lacks basic reasonable accommodation for persons in wheelchairs, which was a barrier to their evacuation. Therefore, it can be concluded that the infrastructure and transport in Ukraine need improvement and better funding to make them barrier-free and accessible in architectural terms.

Preparation for evacuation must consider the needs of persons with various types of impairments. Respondents with disabilities referred to the inaccessibility of information on evacuation methods, and a lack of subtitles prevented deaf persons from getting information.

Unregulated matters of accompaniment for persons with disabilities travelling abroad, let alone the impossibility to accompany persons with severe disorders across the border and on their way to their destination abroad, limited the ability of persons with disabilities to accept proposals of humanitarian assistance programmes abroad.

The answers given by many of the respondents confirmed the assumption made by the researchers that the needs of persons with disabilities had often been disregarded during evacuation. Moreover, the existing mechanism for considering complaints against the violation of rights of persons with disabilities does not always prove to be efficient during an emergency. In order to give persons with disabilities access to a safe and efficient mechanism for responding to violation of their rights and considering their complaints at the same level as others during emergencies, the SES and its structural subdivisions at the territorial level should be involved in responding to such violations and complaints.

CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

This study has detected numerous barriers that cause the violation of the rights of persons with disabilities during evacuation in Ukraine. The aggressive assault by the enemy's army and the imposition of martial law on 24 February 2022 turned out to be a gruelling test for the existing population evacuation system during emergency situations in the country. Public authorities had to make urgent amendments to a number of legal and normative acts in order to adapt to the new reality of war time and the challenges in connection with respect for human rights during the war. Persons with disabilities became one of the most vulnerable categories of the population, and their evacuation was a difficult task not only because of the assault by the enemy's army, but also as a result of a barrier environment that lacked accommodated transport to carry persons in wheelchairs, premises with architectural accessibility, and information notices about evacuation methods and stages adapted to the needs of persons with vision and hearing impairments.

It is preconditioned by a number of problems:

- At the central level, there are no guidelines on evacuating persons with different types of impairments as a category of persons who need special attention for equal access to evacuation.
- There was no proper coordination and interaction at the central, regional, and local levels of different authorities and entities during planning and performing evacuations.
- The authorities and the population did not learn their lesson during the events of 2014 as regards implementing Article 11 of the UN Convention on the Rights of Persons with Disabilities, which obliges State Parties to take all necessary measures to ensure the protection and safety of persons with disabilities in situations of armed conflict.
- The legislation in force on evacuation sometimes contains declarative clauses without any practical implementation mechanisms. The legal and normative acts fail to fully consider the rights and interests of persons with disabilities with various types of impairments.

- The existing rules are disregarded and are not adhered to by public and private entities due to different objective and subjective circumstances.

The detected barriers to the evacuation of persons with disabilities can be grouped into three clusters: environmental, attitudinal, and institutional⁷¹.

ENVIRONMENTAL BARRIERS

Most physical surrounding facilities (bus and railway infrastructure, collective temporary accommodation centres, etc.) used during evacuation are not adapted to the needs of persons with disabilities.

There are not enough vehicles, including coaches and buses, accommodated/accessible to carry persons with disabilities, especially, those in wheelchairs or bedridden; local communities have practically no special vehicles to carry persons with disabilities; most ordinary and school buses fail to meet the requirements for a barrier-free environment and are not adapted to carry persons with disabilities.

Many railway stations do not have mobile lifts, and railway coaches practically have no built-in lifts; the railway infrastructure has a low level of architectural accessibility and lots of barriers; there were no designated accompaniment services.

For the evacuated, there is not enough collective temporary accommodation with architectural accessibility, which would consider the needs of persons with various types of impairments.

The website <https://prykhystok.gov.ua> does not have an option for searching for housing based on the criterion of architectural accessibility for persons with disabilities.

ATTITUDINAL BARRIERS

In Ukraine, persons with disabilities take no part in decision-making on evacuation planning, transportation, or accommodation; they have been facing lots of barriers and problems during the respective processes.

No records are kept on persons with disabilities by types of their impairments.

⁷¹ These barrier clusters are described in the Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action. Inter-Agency Standing Committee (IASC), 2019. https://interagencystandingcommittee.org/system/files/2020-11/IASC%20Guidelines%20on%20the%20Inclusion%20of%20Persons%20with%20Disabilities%20in%20Humanitarian%20Action%2C%202019_0.pdf.

Training programmes for SES staff, rescue services, and railway workers on assistance to the population during emergency situations do not consider all the types of impairments which persons with disabilities and chronic diseases can have.

There are no inter-industry training programmes/briefings/information materials that would provide information to different services and organisations involved in evacuating the population on how to better consider the needs of persons with disabilities depending on various types of impairments, sex, and age.

Persons with disabilities are practically not involved in evacuation planning, training of rescue teams on the peculiarities of treating persons with various types of impairments during transportation, or the logistics of evacuating persons with disabilities: examination/determination of a barrier-free environment and adaptation of the evacuation assembly points, evacuation receiving points, intermediate evacuation points, points to get on/off vehicles, railway/bus infrastructure facilities (railway/bus stations, platforms etc.), the surrounding territory, and vehicles used for evacuation.

INSTITUTIONAL BARRIERS

There is no adequate interaction between different bodies and entities in the civil protection system of Ukraine when evacuation activities are planned and performed, including for persons with disabilities.

There is no liability for failure to consider the needs and interests of persons with disabilities during evacuation, and no designated entity that would hold the legislative right to impose liability for respective violations.

The annual plans for the main civil protection activities for the respective years do not contain any essential activities to the needs of persons with disabilities; in particular, there are no specific activities for persons with hearing and speaking impairments, including deaf persons, persons with vision impairment and blind persons, persons with mobility impairment and self-care difficulties, and persons with cognitive impairments.

Persons with disabilities and/or their representatives who evacuate the population are not included in evacuation commissions and coordination headquarters and do not participate in developing evacuation plans and monitoring whether the needs of persons with various types of impairments are considered in implementing such plans.

The Procedure for Detecting Persons with Disabilities and Other Reduced-Mobility Population Groups Residing in the Area of Emergency or Possible Destruction, and for Organising Their Accompaniment approved by Resolution of the Cabinet of Ministers of Ukraine No. 282 of 18 April 2018 is not consistent with the Civil Protection Code of Ukraine and the Procedure for Evacuation in Case of the Threat or Occurrence of Emergencies (Armed Conflicts) approved by Resolution of the Cabinet of Ministers of Ukraine No. 841 of 30 October 2013 as well as the Guidelines on Planning the Evacuation Activities, approved by Order of the MIA of Ukraine No. 579 of 10.07.2017. These documents contain no clauses on the procedure for arrival of persons with disabilities who cannot get around on their own at evacuation assembly points or for their evacuation from places of permanent residence.

There are no guidelines on keeping records on persons in need of evacuation based on the type of impairment, namely those with vision, hearing, and mobility impairments; intellectual or mental disorders, and other reduced-mobility population groups (persons who accompany them), including those in healthcare, educational, and social protection facilities. Such statistical data are necessary for mainstreaming the needs of persons with disabilities during evacuation.

The legislative rules in terms of notifying persons with disabilities of emergency situations subject to the type of impairment are not detailed.

There is no procedure for evacuating persons with disabilities and/or the elderly who live alone and who do not get around (bed bound) or get around in a wheelchair, and/or have mental or intellectual disorders etc., and no mechanism for funding such evacuation.

There is no mechanism for accompanying persons with grave forms of disability who have no relatives, but wish to be evacuated from Ukraine.

Foreign diplomatic missions of Ukraine fail to issue certificates for consular registration of persons with disabilities and children with disabilities abroad.

The amount of compensation for expenses for temporary accommodation (stay) of internally displaced persons is the same for everyone and fails to consider the need of additional expenses to adapt the housing taking into account the needs of persons with disabilities.

The cases when a person of major age cannot be referred to the medical and social expert examination, and a child cannot be referred to the medical and consulting commission are not determined. This makes it impossible to automatically extend the term of disability for the duration of martial law, although such option is provided for by regulatory acts.

There is no register of housing adapted to the needs of persons with disabilities being evacuated.

The legislation prescribes no requirements for a barrier-free environment, a mechanism and sources for funding examination, or an algorithm for assessing a barrier-free environment.

The state budget does not allocate any funds for adaptation to the needs of persons with disabilities:

- evacuation assembly, receiving, and intermediate points, points to get on/off vehicles, railway/bus infrastructure facilities (railway/bus stations, platforms, etc.), buildings and structures for accommodation, surrounding territory;
- vehicles, including coaches/buses; especially, it is necessary to adapt to the needs of persons in wheelchairs or bedridden persons.

The state budget does not allocate any funds for essential services for the evacuated population, including the provision of water, living essentials, accommodation, medical services and devices, utility and household services, transport, and necessary information.

Public authorities do not monitor respect for the rights of persons with disabilities during emergency situations.

RECOMMENDATIONS



The Verkhovna Rada of Ukraine, the Cabinet of Ministers of Ukraine, the ministries and other central executive authorities, Oblast, Kyiv City State Administrations, and local self-government bodies shall, within their competence and powers:

- ensure proper implementation of Article 11 of the UN Convention on the Rights of Persons with Disabilities, which obliges the State Parties to take, in accordance with their obligations under international law, including international humanitarian law and international human rights law, all necessary measures to ensure the protection and safety of persons with disabilities in situations of risk, including situations of armed conflict, humanitarian emergencies, and the occurrence of natural disasters;
- revise the legislation on evacuation in order to fully consider the rights and interests of all persons with disabilities, especially persons with hearing and speaking impairment, including deaf persons, persons with vision impairment and blind persons, persons with mobility impairment and self-care difficulties, persons with cognitive impairment, and by expanding the legislative rules on evacuation to each nosologic disease.



The Ministry of Internal Affairs of Ukraine and the State Emergency Service of Ukraine, with participation of other ministries and other central executive authorities, shall:

- submit to the Government for consideration legislative amendments as regards bringing the Procedure for Detecting Persons with Disabilities and Other Reduced-Mobility Population Groups Residing in the Area of Emergency or Possible Destruction, and for Organising Their Accompaniment approved by Resolution of the Cabinet of Ministers of Ukraine No. 282 of 18 April 2018 in line with the Civil Protection Code of Ukraine and the Procedure for Evacuation in Case of the Threat or Occurrence of Emergencies (Armed Conflicts) approved by Resolution of the Cabinet of Ministers of Ukraine No. 841 of 30 October 2013, as well as the Guidelines on Planning the Evacuation Activities approved by Order of the MIA of Ukraine No. 579 of 10.07.2017; by including into those documents without limitation clauses on making lists of persons to be evacuated, and the procedure for arrival of persons with disabilities who cannot get around on their own at evacuation assembly points or for their evacuation from places of permanent residence;

- submit to the Government for consideration the legislative amendments as regards bringing in line the Civil Protection Code of Ukraine and the Regulation on the Organisation of Notification of the Threat or Occurrence of Emergencies and the Organisation of Communications in the Field of Civil Protection approved by Resolution of the Cabinet of Ministers of Ukraine No. 733 of 27 September 2017, in terms of the notification of persons with disabilities about emergency situations, and describe in detail the peculiarities of such notification depending on the type of impairments of such persons;
- submit to the Government for consideration the legislative amendments as regards the procedure for evacuating persons with disabilities and/or the elderly (have no family or have been abandoned by their family) who live alone and who do not get around (bed bound) or get around in a wheel chair, and/or have mental or intellectual disorders etc., and the mechanism for funding such evacuation (such as Resolution of the Cabinet of Ministers of Ukraine No. 385 of 27 March 2022);
- submit to the Government for consideration legislative amendments as regards a mechanism for accompanying persons with grave forms of disability who have no relatives, but wish to be evacuated from Ukraine and can be hosted abroad, by representatives of state, municipal entities, and/or charitable, volunteer, civil society, and other non-governmental organisations, provided that they have to return;
- include into the annual plans for the main civil protection activities for respective years the activities for the civil protection of persons with hearing and speaking impairments, including deaf persons, persons with vision impairment and blind persons, persons with mobility impairment and self-care difficulties, and persons with cognitive impairments;
- submit to the Government for consideration legislative amendments as regards a procedure for interaction between different bodies and entities in the civil protection system of Ukraine when evacuation activities are planned and performed, including for persons with disabilities;
- submit to the Government for consideration legislative amendments as regards introducing liability for failure to consider the needs and interests of persons with disabilities during evacuation, and designating the entity that would hold the legislative right to impose liability for respective violations;

- submit to the Government for consideration legislative amendments as regards authorising SES to monitor the consideration of the rights and interests of persons with disabilities during the elimination of emergency situations and to prepare a corresponding report based on such monitoring, which is to be made public and presented (after each emergency situation);
- submit to the Government for consideration legislative amendments as regards determining and approving the legislative requirement for a barrier-free environment, mechanisms and sources of funding of examination, and algorithms for assessing a barrier-free environment, and adaptation of:
 - evacuation assembly, receiving and intermediate points, points to get on/off vehicles, railway/bus infrastructure facilities (railway/bus stations, platforms etc.), buildings and structures for accommodation, the surrounding territory, and vehicles;
 - vehicles, including coaches/buses (and school buses) that are planned to be used to carry persons with disabilities during an emergency situation, especially, those in wheelchairs or bedridden persons;
 - essential services for the evacuated population, including the provision of water, living essentials, accommodation, medical services and devices, utility and household services, transport, and necessary information.



The State Emergency Service of Ukraine, the Ministry of Internal Affairs of Ukraine, the Ministry for Reintegration of the Temporarily Occupied Territories, the Ministry of Social Policy of Ukraine, the Ministry of Health of Ukraine, the Ministry of Education and Science of Ukraine, the Ministry of Infrastructure, and the Ministry for Communities and Territories Development shall:

- develop and approve the guidelines on the engagement of persons with disabilities and/or organisations acting on their behalf and entities that provide work or services to persons with disabilities (upon their consent) in:
 - developing plans for evacuation, receipt, and accommodation of the population taking into account the needs of persons with disabilities;
 - evacuating and transporting persons with disabilities, and logistics of the respective processes;

- examining and determining a barrier-free environment and adapting the evacuation assembly points, evacuation receiving points, intermediate evacuation points, points to get on/off vehicles, railway/bus infrastructure facilities (railway/bus stations, platforms etc.), buildings and structures for accommodation, and the surrounding territory;
- examining and determining a barrier-free environment and adapting vehicles, including coaches/buses (and school buses) used to carry and meet persons with disabilities being evacuated, especially those in wheelchairs or bedridden persons, during an emergency situation;
- develop and approve the guidelines on establishing and calculating the statistical data necessary to determine the priorities and peculiarities during evacuation of persons with disabilities, namely those with vision, hearing, and mobility impairments; intellectual or mental disorders, and other reduced-mobility population groups (persons who accompany them), including those in healthcare, educational, and social protection facilities.



The Ministry for Reintegration of the Temporarily Occupied Territories, the Ministry of Internal Affairs of Ukraine, the State Emergency Service of Ukraine, Oblast, Kyiv City State Administrations, and local self-government bodies shall:

- engage persons with disabilities and/or organisations acting on their behalf and entities that provide work or services to intermediate evacuation points (upon their consent) in evacuation commissions, humanitarian and coordination headquarters, development of plans for evacuation, receipt and accommodation; lists of evacuation assembly, receiving, and intermediate points; points to get on/off vehicles, railway/bus infrastructure facilities (railway/bus stations, platforms etc.) vehicles, buildings and structures for accommodation, and evacuation routes, as well as evacuation and carriage of persons with disabilities, and the logistics of applicable processes. Ensure adoption of necessary legislative amendments in this regard.



The Ministry for Communities and Territories Development of Ukraine, and the Ministry for Reintegration of the Temporarily Occupied Territories of Ukraine shall:

- improve the search for accommodation for persons with disabilities at prykhystok.gov.ua so that it will be clear whether it is accessible in architectural terms;
- develop the register of premises for temporary accommodation of evacuated persons and housing available for internally displaced persons with disabilities.



The Ministry for Communities and Territories Development of Ukraine, and the Ministry of Social Policy of Ukraine shall:

- submit to the Government for consideration legislative amendments as regards increasing at least two fold the amount of compensation for expenses for the temporary accommodation (stay) of internally displaced persons with disabilities under the Procedure approved by Resolution of the Cabinet of Ministers of Ukraine No. 333 of 19 March 2022.



The Ministry of Foreign Affairs of Ukraine shall:

- ensure that foreign diplomatic missions of Ukraine issue certificates for consular registration of persons with disabilities and children with disabilities abroad.



The Ministry of Health of Ukraine shall:

- submit to the Government for consideration amendments to Resolution of the Cabinet of Ministers of Ukraine No. 225 of 8 March 2022 as regards determining the cases when a person of major age cannot be referred to a medical and social expert examination, and a child cannot be referred to a medical and consulting commission.



The Ministry of Education and Science of Ukraine, the Ministry of Internal Affairs of Ukraine, the Ministry of Infrastructure of Ukraine, Ukrzaliznytsia JSC, and the State Emergency Service of Ukraine shall:

- improve the training programmes for SES staff, rescue services, and railway workers on assisting the population during emergency situations taking into account the full range of types of impairments which persons with disabilities and chronic diseases can have. Ensure that persons with disabilities are engaged into respective trainings and briefings.



The Ministry of Social Policy of Ukraine, the Ministry of Economy of Ukraine, and the State Property Fund of Ukraine shall:

- during martial law, avoid reorganisation and/or privatisation of existing state (governmental) rehabilitation centres, health resources, and state prosthetics and orthopaedic enterprises, which were an element of the rehabilitation system for persons with disabilities, and provide adequate funding to them.



The Ministry for Communities and Territories Development of Ukraine, and the Ministry of Social Policy of Ukraine shall:

- submit to the Government for consideration amendments to Resolution of the Cabinet of Ministers of Ukraine No. 385 of 27 March 2022 as regards obliging the NSS to register every temporarily displaced (evacuated) child and person who resides or is registered with facilities of different types, ownership forms, and subordination for 24/7 stay, and who have been temporarily displaced within Ukraine, with specification of names of the facilities and settlements.



The Ministry of Finance of Ukraine, the Ministry of Infrastructure of Ukraine, and Ukrzaliznytsia JSC shall:

- provide for expenditures for Ukrzaliznytsia JSC to purchase coaches adapted to carry passengers with disabilities, and to adapt railway infrastructure to the needs of this category of persons to ensure unhindered movement of passengers with disabilities and to purchase wheelchair lifts for persons with disabilities to get on/off trains at all railway stations.



The Ministry for Reintegration of the Temporarily Occupied Territories, and the Ministry of Finance of Ukraine shall:

- allocate financial support to non-governmental organisations that evacuate the population, including persons with disabilities;
- submit to the Government for consideration procedure for allocating financial support to non-governmental organisations that evacuate the population, including persons with disabilities.



The Ministry of Finance of Ukraine, the Oblast, Kyiv City State Administrations, and local self-government bodies shall:

- provide for the funding necessary to adapt the following to the needs of persons with disabilities:
 - evacuation assembly, receiving and intermediate points, points to get on/off vehicles, railway/bus infrastructure facilities (railway/bus stations, platforms etc.), buildings and structures for accommodation, the surrounding territory, and vehicles;
 - vehicles, including coaches/buses that are planned to be used to carry persons with disabilities during an emergency situation, especially those in wheelchairs or bedridden persons;
- provide for the funding necessary for essential services for the evacuated population, including the provision of water, living essentials, accommodation, medical services and devices, utility and household services, transport, and necessary information.

ANNEXES

Annex 1. LIST OF LEGAL AND NORMATIVE ACTS ON MATTERS OF EVACUATING PERSONS WITH DISABILITIES IN UKRAINE STUDIED DURING THE ANALYSIS

- 1.** Constitution of Ukraine;
- 2.** Civil Protection Code of Ukraine;
- 3.** Law of Ukraine “On Legal Regime of Martial Law”;
- 4.** Law of Ukraine “On Ensuring of Rights and Freedoms of Internally Displaced Persons”;
- 5.** Law of Ukraine “On Mobilisation Preparation and Mobilisation”;
- 6.** Law of Ukraine “On the Fundamentals of Social Protection of Persons with Disabilities in Ukraine”;
- 7.** Law of Ukraine No. 2466-IX of 27 July 2022 “On Amending the Law of Ukraine ‘On Privatisation of the State and Municipal Property’ as regards Amendments to Certain Clauses and Promotion of Investment during Privatisation”;
- 8.** Decree of the President No. 64 of 24 February 2022 “On the Imposition of Martial Law in Ukraine”;
- 9.** Decree of the President No. 133/2022 of 14 February 2022 “On the Extension of Martial Law in Ukraine”;
- 10.** Decree of the President No. 259/2022 of 18 April 2022 “On the Extension of Martial Law in Ukraine”;
- 11.** Decree of the President No. 341/2022 of 17 May 2022 “On the Extension of Martial Law in Ukraine”;
- 12.** Decree of the President No. 573/2022 of 12 August 2022 “On the Extension of Martial Law in Ukraine”;
- 13.** Decree of the President of Ukraine No. 93 of 2 March 2022 “On Coordination of Activities to Settle Humanitarian and Social Affairs”;
- 14.** Resolution of the Cabinet of Ministers of Ukraine No. 57 of 27 January 1995 “On Approving the Rules for Crossing the State Border by the Ukrainian Citizens”;
- 15.** Resolution of the Cabinet of Ministers of Ukraine No. 841 of 30 October 2013 “On Approving the Procedure for Evacuation in Case of the Threat or Occurrence of Emergencies”;

- 16.** Resolution of the Cabinet of Ministers of Ukraine No. 11 of 9 January 2014 “On Approving the Regulation on the Unified State Civil Protection System”;
- 17.** Resolution of the Cabinet of Ministers of Ukraine No. 626 of 9 August 2017 “On Approving the Procedure for Developing Action Plans of the Unified State Civil Protection System”;
- 18.** Resolution of the Cabinet of Ministers of Ukraine No. 733 of 27 September 2017 “On Approving the Regulation on the Organisation of Notification of the Threat or Occurrence of Emergencies and the Organisation of Communications in the Field of Civil Protection”;
- 19.** Resolution of the Cabinet of Ministers of Ukraine No. 282 of 18 April 2018 “On Approving the Procedure for Detecting Persons with Disabilities and Other Reduced-Mobility Population Groups Residing in the Area of Emergency or Possible Destruction, and for Organising Their Accompaniment”;
- 20.** Ordinance of the Cabinet of Ministers of Ukraine No. 80-p of 12 February 2014 “On Approving the Civil Protection Basic Action Plan 2014”;
- 21.** Ordinance of the Cabinet of Ministers of Ukraine No. 476-p of 14 May 2015 “On Approving the Civil Protection Basic Action Plan 2015”;
- 22.** Ordinance of the Cabinet of Ministers of Ukraine No. 269-p of 6 April 2016 “On Approving the Civil Protection Basic Action Plan 2016”;
- 23.** Ordinance of the Cabinet of Ministers of Ukraine No. 9-p of 11 January 2017 “On Approving the Civil Protection Basic Action Plan 2017”;
- 24.** Ordinance of the Cabinet of Ministers of Ukraine No. 981-p of 27 December 2017 “On Approving the Civil Protection Basic Action Plan 2018”;
- 25.** Ordinance of the Cabinet of Ministers of Ukraine No. 1076-p of 27 December 2018 “On Approving the Civil Protection Basic Action Plan 2019”;
- 26.** Ordinance of the Cabinet of Ministers of Ukraine No. 1316-p of 18 December 2019 “On Approving the Civil Protection Basic Action Plan 2020”;
- 27.** Ordinance of the Cabinet of Ministers of Ukraine No. 1659-p of 28 December 2020 “On Approving the Civil Protection Basic Action Plan 2021”;

- 28.** Ordinance of the Cabinet of Ministers of Ukraine No. 1742-p of 28 December 2021 “On Approving the Civil Protection Basic Action Plan 2022”;
- 29.** Ordinance of the Cabinet of Ministers of Ukraine No. 179-p of 24 February 2022 “On the Organisation of Functioning of the Unified State Civil Protection System during Martial Law”;
- 30.** Resolution of the Cabinet of Ministers of Ukraine No. 225 of 8 March 2022 “Certain Issues of the Procedure for Medical and Social Expert Examination during the Martial Law in Ukraine”;
- 31.** Resolution of the Cabinet of Ministers of Ukraine No. 333 of 19 March 2022 “On Approving the Procedure for Compensating for Expenses for Temporary Accommodation of the Persons Internally Displaced during the Martial Law”;
- 32.** Resolution of the Cabinet of Ministers of Ukraine No. 332 of 20 March 2022 “Certain Matters of Paying Housing Benefits to the Internally Displaced Persons”;
- 33.** Resolution of the Cabinet of Ministers of Ukraine No. 385 of 27 March 2022 “Certain Matters of Temporary Displacement (Evacuation) of the Children and Persons Residing in or Registered with Facilities of Different Types, Ownership Forms, and Subordination for 24/7 Care, during the Martial Law”;
- 34.** Resolution of the Cabinet of Ministers of Ukraine No. 740 of 28 June 2022 “Certain Matters of Protecting the Rights of Deportees and Internally Displaced Persons”;
- 35.** Resolution of the Cabinet of Ministers of Ukraine No. 854 of 29 July 2022 “On Establishing the Coordination Headquarters to Prepare Mandatory Evacuation of the Population from Donetsk Oblast during Martial Law”;
- 36.** Ordinance of the Cabinet of Ministers of Ukraine No. 679-p dated 2 August 2022 “On Mandatory Evacuation of the Population from Donetsk Oblast”;
- 37.** Order of the MIA of Ukraine No. 579 of 10 July 2017 “On Approving the Guidelines on Planning Evacuation Activities”.

Annex 2. LIST OF KEY INFORMANTS FOR THE STUDY

- 1.** Government Commissioner for the Rights of Persons with Disabilities (*personal interview*);
- 2.** Officials from the Secretariat of the Ukrainian Parliament Commissioner for Human Rights (*group interview with five officials*);
- 3.** Officials from the Ministry for Reintegration of the Temporarily Occupied Territories (*written responses*);
- 4.** Officials from the State Emergency Service of Ukraine (*written responses*);
- 5.** Officials from the Ministry of Social Policy of Ukraine (*written responses*);
- 6.** Officials from the National Social Service of Ukraine (*written responses*);
- 7.** Officials from the Department of Social Welfare of Donetsk Oblast State Administration (*group interview with four officials*);
- 8.** Official from the Department of Social Welfare of Luhansk Oblast State Administration (*personal interview*);
- 9.** Official from the Department of Social Welfare of Lviv Oblast State Administration (*personal interview*);
- 10.** Official from the of the Humanitarian Headquarters of Lviv Oblast (*personal interview*);
- 11.** Official from the Directorate of Social Welfare of Sloviansk City Council (*personal interview*);
- 12.** Officials from Kramatorsk City Council (*group interview with three officials*);
- 13.** Heads/representatives of NGOs and volunteering, charitable, civil society, and other organisations experienced in evacuating persons with disabilities (CO “Doctors without Borders”, CF “VostokSOS”, NGO “DonbasSOS”, CO “SaveUkraine”, NGO “Kharkiv Centre of Rehabilitation of Young Persons with Disabilities and Their Family Members “Right to Choose” [Kharkiv], NGO “Association for the Protection of Rights and Assistance to Persons with Disabilities “Open Hearts” [Vinnytsia], State Rehabilitation Institution “Complex Rehabilitation Centre for Persons with Disabilities “DONBAS”) (*focus group with nine persons*);

- 14.** Heads/representatives of civil society organisations of persons with disabilities experienced in evacuating persons with disabilities (PA “Ukrainian League of Organisations of Persons with Vision Disability “Modern Look” [Kyiv], NGO “Ukrainian Organisation of Persons with Hearing Disability “Ukrainian Society of the Deaf” [Kyiv], NGO “Donetsk Regional Organisation of the Ukrainian Organisation “Union of Persons with Disabilities of Ukraine” [Kramatorsk], NGO “Pokrovsk District Organisation of Persons with Disabilities” [Pokrovsk], NGO “Development of the Child’s Personality Plus” [Berdiansk], NGO “Ocean of Good” [Dnipro]) (*focus group with seven persons with disabilities or their legal representatives*);
- 15.** Heads of other civil society organisations of persons with disabilities and their enterprises (*without audio*);
- 16.** 223 persons with disabilities gave their answers by completing the Google Form.

Annex 3. LIST OF SOURCES ANALYSED

- 1.** Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action. Inter-Agency Standing Committee (IASC), 2019. https://interagencystandingcommittee.org/system/files/2020-11/IASC%20Guidelines%20on%20the%20Inclusion%20of%20Persons%20with%20Disabilities%20in%20Humanitarian%20Action%2C%202019_0.pdf
- 2.** OCHA Report on Ukraine for October 2022. <https://reports.unocha.org/uk/country/ukraine>
- 3.** Ukraine Internal Displacement Report. General Population Survey, Round 9, 26 September 2022. IOM. https://displacement.iom.int/sites/g/files/tmzbd1461/files/reports/IOM_Gen%20Pop%20Report_R9_IDP_FINAL_UKR%20version.pdf
- 4.** Step-by-step practical guidance on inclusive humanitarian field work. CBM Global Disability Inclusion Downloadable at: <https://hhot.cbm.org/uk/download>
- 5.** Cash Feasibility Assessment conducted on adult internally displaced people (IDPs) with disabilities in Ukraine in May/June 2022. <https://naiu.org.ua/cash-feasibility-assessment-conducted-on-adult-internally-displaced-people-idps-with-disabilities-in-ukraine-in-may-june-2022-cash-feasibility-assessment-conducted-on-adult-internally-displaced-people/>
- 6.** Analytical Report on Obtaining the Certificate and Benefits as an IDP. <https://naiu.org.ua/analitychnyj-zvit-shhodo-oformlennya-dovidky-ta-dopomogy-yak-vpo/>
- 7.** Analytical Report on the results of a survey on the access of people with disabilities to various types of aid and services provided at their permanent places of residence during the wartime (ENG) <https://naiu.org.ua/analitychnyj-zvit-za-rezultatamy-opytuvannya-shhodo-dostupu-lyudej-z-invalidnistyu-do-riznyh-vydiv-dopomogy-poslug-za-yihnim-postijnym-mistsem-prozhyvannya-pid-chas-voyennogo-stanu-eng/>
- 8.** Report “Rights of persons with disability in the armed conflict in the East of Ukraine” <https://helsinki.org.ua/wp-content/uploads/2016/09/People-with-disabiity-and-army-cocnflct-in-Eastern-Ukraine.pdf>
- 9.** Minimum Standards for Age and Disability Inclusion in Humanitarian Action. Age and Disability Consortium, 2016 (translated into Ukrainian by HelpAge International on behalf of Age and Disability Consortium).

- 10.** Guidance note for cluster partners on collecting data on people with disabilities in the context of the Humanitarian Programme Cycle (HPC) https://www.globalprotectioncluster.org/wp-content/uploads/Protection-Guidance-Note_Collecting-Data-on-PwD_UA.pdf
- 11.** Guidance on strengthening disability inclusion <https://www.globalprotectioncluster.org/wp-content/uploads/Guidance-on-Strengthening-Disability-Inclusion-in-Humanitarian-Response-Plans.pdf>
- 12.** The Inclusion of Persons with Disabilities in EU-funded Humanitarian Aid Operations https://ec.europa.eu/echo/files/policies/disability_inclusion/doc_echo_og_inclusion_ukr_liens_bd_ua.pdf (The unofficial translation of the Guidance was made by the Global Protection Cluster in Ukraine <http://www.globalprotectioncluster.org/field-support/field-protection-clusters/ukraine/> from the original English version available at https://ec.europa.eu/echo/sites/echo-site/files/2019-01_disability_inclusion_guidance_note.pdf)
- 13.** UNHCR, Working with Persons with Disabilities in Forced Displacement (2019).
- 14.** Sphere, Sphere Standards Handbook (2018).
- 15.** Help Age, CBM, Handicap International, Humanitarian inclusion standards for older people and people with disabilities (2018).
- 16.** IOM, Norwegian Refugee Council, UNHCR, Camp Management Toolkit (2015).
- 17.** CCCM Cluster, Collective Centre Guidelines (2010).
- 18.** OCHA. Guiding Principles on Internal Displacement (2004). <https://www.unhcr.org/43ce1cff2.pdf>
- 19.** CCCM, Urban Displacement and Out of Camps Review (2013).
- 20.** CCCM Cluster, MHPSS in Emergency Settings: What should Camp Coordination and Camp Management Actors Know? (2014).
- 21.** Guidelines on Inclusion of Persons with Disabilities in Humanitarian Action. Inter-Agency Standing Committee (IASC), 2019.
- 22.** Step-by-step practical guidance on inclusive humanitarian field work. CBM Global Disability Inclusion Downloadable at: <https://hhot.cbm.org/uk/download>
- 23.** Rating of the oblast, Kyiv city state administrations by the degree of barrier-free physical surrounding facilities and services (based on the results of monitoring of 2021) https://www.minregion.gov.ua/wp-content/uploads/2022/01/prezentacziya_2021.pdf

- 24.** 24.02. Evacuation of People with Disabilities. Analytical Report. Fight for Right NGO. 2022
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