

GREVIO
Baseline Evaluation Report
Ukraine

" Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO)



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GREVIO's (baseline) evaluation report

on legislative and other measures
giving effect to the provisions
of the Council of Europe Convention
on Preventing and Combating
Violence against Women and Domestic Violence
(Istanbul Convention)

UKRAINE

Group of Experts
on Action against Violence against Women
and Domestic Violence (GREVIO)

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Foreword

The Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) is an independent human rights monitoring body mandated to monitor the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (CETS No. 210, "the Istanbul Convention") by the parties to the convention. It is composed of 15 independent and impartial experts appointed on the basis of their recognised expertise in the fields of human rights, gender equality, violence against women and/or assistance to and protection of victims.

GREVIO's statutory activities include country-by-country monitoring of the Istanbul Convention (evaluation procedure), the initiation of inquiries into specific circumstances within a party to the convention (inquiry procedure) and the adoption of general recommendations on themes and concepts of the convention.

This report is the fruit of the first (baseline) evaluation procedure carried out in respect of Ukraine. It covers the Istanbul Convention in its entirety[1] and thus assesses the level of compliance of country legislation and practice in all areas covered by the convention. In light of the scope of the convention – as set out in its Article 2, paragraph 1 – the baseline evaluation focuses on measures taken in relation to "all forms of violence against women, including domestic violence, which affects women disproportionately". Hence, the term "victim" used throughout this report is to be understood as referring to a woman or girl victim.

Based on this assessment, the report proposes measures to strengthen the implementation of the convention. In proposing such measures, GREVIO has adopted the use of different verbs that correspond to different levels of urgency, noting that all of them are important. These are, in order of priority, "urges", "strongly encourages", "encourages" and "invites". GREVIO uses the verb "urges" where it considers that immediate action is required to bring the party's legislation or policy into compliance with the Istanbul Convention or to ensure its implementation. "Strongly encourages" is used where GREVIO has noted shortcomings that need to be remedied in the near future in order to ensure comprehensive implementation of the convention. A third level of urgency is indicated by the use of the verb "encourages", which is used for shortcomings that require attention though possibly at a later stage. Last, the verb "invites" points to small gaps in implementation that the party is requested to consider closing or to proposals made to provide guidance in the implementation process.

The first (baseline) evaluation procedure is made up of several steps, each of which allows GREVIO to obtain critical information upon which to base its report. It is carried out as a process of confidential dialogue with the aim of offering country-specific proposals and suggestions for improvement developed within the national context of the party under review. These include the following:

- the submission, by the party, of a report drawn up on the basis of GREVIO's baseline questionnaire (the state report);
- an evaluation visit to the party under review to meet with governmental and non-governmental representatives working in this field;
- comments by the party on GREVIO's draft report;
- publication of GREVIO's report after its adoption together with any comments received from the party.

In addition, GREVIO also collects additional information from various other sources, including non-governmental organisations (NGOs), other members of civil society, national human rights institutions and Council of Europe bodies (Parliamentary Assembly, Human Rights Commissioner and other pertinent bodies), as well as other international treaty bodies. Within the framework of the evaluation of country, GREVIO received written contributions from the Analytical Centre JurFem, the

1. With the exception of Chapter VIII of the convention, which GREVIO considered as less relevant in assessing the national situation in each contracting party.

Women's Perspectives centre and a joint report submitted by the European Human Rights Advocacy Centre, Women's Initiatives for Gender Justice, La Strada, the Ukrainian Legal Advisory Group and Equality Now.

The state report and the written contributions submitted by civil society have been made public and are available on the official website of the Istanbul Convention.

The analysis, suggestions and proposals contained in this first baseline evaluation report were drawn up under the exclusive responsibility of GREVIO. It covers the situation as observed by the GREVIO delegation during its evaluation visit to Ukraine. Where available, significant legislative and policy developments up until 2 July 2026 have also been taken into account.

According to the convention, national parliaments shall receive this report from the national authorities (Article 70, paragraph 2). GREVIO requests the national authorities to translate this report into their official national language(s) and to ensure that it is widely disseminated, not only to the relevant state institutions at all levels (national, regional and local), in particular to the government, the ministries and the judiciary, but also to NGOs and other civil society organisations that work in the field of violence against women.

Executive summary

This report provides an assessment of the measures of implementation taken by the authorities in Ukraine with regard to all aspects of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence ("the Istanbul Convention").

This assessment has been carried out by the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), an independent human rights monitoring body mandated to monitor the implementation of the convention. GREVIO's findings are based on the information obtained during the various steps of the first (baseline) evaluation procedure set out in Article 68 of the convention, including from written reports (a state report submitted by the country authorities, additional information submitted by the Analytical Centre JurFem, Women's Perspectives and a joint report submitted by the European Human Rights Advocacy Centre, Women's Initiatives for Gender Justice, La Strada, the Ukrainian Legal Advisory Group and Equality Now) and from a three-day evaluation visit to Ukraine (Kyiv). A list of the bodies and entities with which GREVIO had exchanges can be found in Appendix II.

The report assesses the wide variety of measures taken by the Ukrainian authorities since the ratification of the Istanbul Convention in July 2022, during the war of aggression by the Russian Federation. The report praises the political will on the part of the Ukrainian authorities to apply the convention's far-reaching provisions also during times of conflict, despite the immense challenges posed by the war.

The Ukrainian authorities have started taking measures to better align the Ukrainian legislation with the provisions of the Istanbul Convention already before ratification, in particular through the 2017 Law on Preventing and Combating Domestic Violence. These efforts have continued since. In 2024 for example, the administrative offence of sexual harassment was introduced. Moreover, several strategic documents to prevent and combat violence against women have been designed, embedded in the overall objective of promoting gender equality in Ukrainian society. They include measures in the field of prevention, protection and prosecution and aim to address the root causes of violence against women. Their implementation is supported by a robust system of co-ordination of policies and programmes at national level. The report also highlights the recognition by the Ukrainian authorities of the importance of paying specific attention to the needs of women exposed to intersectional discrimination, such as older women, women with disabilities, rural women, internally displaced women and women from national minorities. Additionally, strong co-operation of state actors with women's rights organisations and civil society has developed to meet the needs of women victims of violence.

A network of specialist support services was set up - and reinforced in 2023 and 2024 - including shelters and crisis rooms, helplines, legal aid services and services providing psychological support for victims of domestic violence around the country. In addition to these services, around 700 multi-disciplinary mobile teams provide social and psychological support directly to women victims of domestic violence, in particular in rural areas.

Efforts to improve the training of professionals must also be underlined, in particular the setting up of a National Training Centre for Gender-Based Violence Response. Moreover, extensive training has been provided to police officers, prosecutors and members of the Security Service of Ukraine on conflict-related sexual violence since the beginning of the war of aggression by the Russian Federation, which has resulted in an increased capacity to investigate and prosecute this form of violence. In doing so, emphasis has been placed on the protection, needs and rights of victims. A specialised unit on domestic violence was established in the Prosecutor General's Office and, since 2018, mobile police response groups to domestic violence incidents have been set up.

Despite these positive developments, the report stresses the need for further alignment of Ukrainian legislation with the Istanbul Convention, including the need to criminalise stalking and to ensure *ex officio* prosecution of several of the forms of violence covered by the Istanbul Convention that may currently only be prosecuted upon a victim's complaint, a situation likely to deter victims from

reporting such offences. Moreover, sentences for the different forms of violence are generally lenient, often limited to a fine and community service, and not sufficiently effective, proportionate and dissuasive.

The report also notes the high levels of stress to which people in Ukraine have been exposed since the beginning of the war of aggression and the fact that daily exposure to violence may lead to higher levels of acceptance of violence in society, including violence against women. It points to the increasing connection that is being made between active military service and severe domestic violence perpetration in Ukraine. While measures have been taken by the authorities to mitigate the impact of post-traumatic stress disorder among military personnel and to reduce the risk of commission of domestic violence, more measures need to be taken to raise awareness on violence against women among men serving in the military and to reduce the stigma experienced by women victims of such violence.

Additional efforts are also needed to improve the capacity of police officers outside the specialised units on domestic violence to respond promptly, appropriately and with a gender-sensitive and trauma-informed perspective to all forms of violence covered by the Istanbul Convention. Furthermore, the report underlines the lack of recording, in situations of domestic violence, of the presence of children as well as shortages in the provision of age-appropriate psychological examination and support to children exposed to domestic violence.

Another area of concern relates to the fact that very few court decisions lead to restrictions of custody and visitation rights in situations with a history of domestic violence, in a context in which disputes over the custody of children have become more acute since the beginning of the war of aggression by the Russian Federation. Furthermore, women victims of violence are often encouraged to enter alternative dispute resolution procedures, in civil and criminal law proceedings, by professionals who are not sufficiently trained on the dangers of alternative dispute resolution processes in situations with a history of domestic violence or in the absence of screening for such violence.

Last, the report underlines the need for the Ukrainian authorities to take measures to comply with the requirements of Article 60 of the Istanbul Convention on gender-based asylum claims.

While GREVIO welcomes the efforts made by the Ukrainian authorities to implement the Istanbul Convention, it has identified a number of issues that require urgent action by the authorities to comply fully with the convention's provisions. These relate in particular to the need to:

- simplify the existing legal framework on domestic violence to ensure greater clarity and to develop a common recognition and understanding of the phenomenon of violence against women as a form of gender-based violence;
- reinforce existing measures for the Istanbul Convention's consistent implementation throughout the country; ensure that policies and programmes address all forms of violence against women covered by the Istanbul Convention; enhance the co-ordination, implementation, monitoring and evaluation of policies and measures with regard to violence against women, by allocating the necessary human and financial resources for these functions;
- ensure that, in the provision of humanitarian assistance, due attention is paid to preventing violence against women and girls and protecting them from such violence;
- develop a system of administrative data collection on all forms of violence covered by the Istanbul Convention and harmonise data collection between law-enforcement agencies and the judiciary;
- further strengthen the primary prevention of all forms of violence against women; increase the quality of perpetrator programmes by developing minimum standards, roll these programmes out throughout the country and embed systematic risk-assessment procedures in work with perpetrators of domestic violence in order to ensure safety of the victims and their children;
- take further measures to ensure the availability of clear and updated protocols on the detection, care and referral of women victims of all forms of violence; safeguard access to

specialist support services by investing in an adequate geographic distribution and ensuring their long-term sustainability;
- further improve the legislation governing offences of sexual violence with a view to removing the remaining barriers that limit the effectiveness of the definition of rape based on the notion of freely given consent; ensure a context-sensitive interpretation of the circumstances of non-consensual sexual acts, through standardised operating procedures for prosecutors;
- introduce multi-agency co-operation in risk assessment in order to assess the evolving nature of the risk; ensure that emergency barring orders are implemented in a manner that effectively protects the safety of victims of domestic violence in case of immediate danger.

Furthermore, GREVIO has identified a number of additional areas in which improvements are required in order to comply fully with the obligations of the convention. These relate, among other things, to the need to ensure that all professionals working with victims or perpetrators of all forms of violence covered by the Istanbul Convention, in particular the judiciary, receive systematic and mandatory initial and in-service training to identify and respond to all forms of violence. The report also emphasised the need to ensure the sustainability of the financial resources allocated to measures and policies for preventing and combating violence against women, including to women's rights organisations that run specialist support services for women victims of all forms of violence. The importance of regularly conducting population-based surveys on all forms of violence against women was highlighted, as well as the need to ensure that women victims of violence and harassment at work are adequately supported. Last, the report stressed the need to step up efforts to remove any obstacles for victims of violence against women to access free legal aid.

Introduction

Ukraine ratified the Istanbul Convention on 18 July 2022. In accordance with Article 78, paragraph 2, of the convention, Ukraine reserves the right not to apply the provisions under Article 30, paragraph 2, of the convention. This reservation is valid for a period of five years from the day of the entry into force of the convention in respect of Ukraine and may be renewed.

The Istanbul Convention is the most far-reaching international treaty to tackle violence against women and domestic violence. Its comprehensive set of provisions spans far-ranging preventive and protective measures as well as a number of obligations to ensure an adequate criminal justice response to such serious violations of human rights. It covers new ground by asking that root causes of violence against women (such as gender stereotyping, traditions harmful to women and general manifestations of gender inequality) be addressed.

The convention sets up a monitoring mechanism to assess the level of implementation by its parties. This monitoring mechanism consists of two pillars: the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), an independent expert body, and the Committee of the Parties, a political body composed of official representatives of the parties to the convention.

In accordance with Article 68 of the convention, GREVIO initiated the baseline evaluation in respect of Ukraine by letter and transmission of its questionnaire on 30 January 2023. The order of reporting to GREVIO is based on a combination of regional groupings and order of ratification. The Ukrainian authorities subsequently submitted their state report on 3 July 2023 – the deadline set by GREVIO. GREVIO thanks the Ukrainian authorities for having abided by their monitoring obligations despite the ongoing war of aggression by the Russian Federation. Following a preliminary examination of the country state report, GREVIO carried out an evaluation visit to Ukraine, which took place from 14 to 16 May 2025. The delegation was composed of:

- Ivo Holc, Member of GREVIO
- Pille Tsopp-Pagan, Member of GREVIO
- Grzegorz Wrona, Member of GREVIO
- Johanna Nelles, Executive Secretary of the Istanbul Convention
- Françoise Kempf, Senior Legal Adviser at the Secretariat of the monitoring mechanism of the Istanbul Convention

During the evaluation visit, the delegation was welcomed by high-level public figures, including Iryna Postolovska, Deputy Minister of Social Policy, Family and Unity of Ukraine and Kateryna Levchenko, Government Commissioner for Gender Policy. In addition, the delegation met with a wide range of governmental and non-governmental representatives working in the area of preventing and combating violence against women. A list of the national authorities, non-governmental organisations and others met is set out in Appendix II of this report. GREVIO is grateful for the valuable information provided by all of them.

The evaluation visit was prepared in close co-operation with Nataliia Bohdanova, Head of the Expert Group on Combating Trafficking in Human Beings, Domestic Violence and Gender Equality, and Andriy Labun, State Expert in the Ministry of Social Policy, Family and Unity of Ukraine, who were appointed as contact persons for the evaluation by GREVIO. GREVIO wishes to extend its gratitude for the co-operation and support provided throughout the entire evaluation procedure, and for the constructive approach adopted by the Ukrainian authorities.

As part of this first baseline evaluation, GREVIO examined the implementation measures taken by the Ukrainian authorities concerning all aspects of the convention. For the sake of brevity, this report gives priority to some provisions over others. While it covers all chapters of the convention (with the exception of Chapter VIII), it does not present detailed assessments and conclusions for each provision.

I. Purposes, definitions, equality and non-discrimination, general obligations

A. General principles of the convention

1. Chapter I of the Istanbul Convention sets out general principles that apply to all the substantive articles contained in Chapters II to VII. These include, among other things, that it is a fundamental human right for everyone, particularly women, to live a life free from violence in both the public and the private sphere, that the convention must be implemented without discrimination on any ground and that the potential for, and effects of, multiple forms of discrimination should be borne in mind. They also spell out that a gender perspective must be integrated into the implementation of the convention and the evaluation of its impact.

2. GREVIO commends the Ukrainian authorities for having ratified the Istanbul Convention during the ongoing war of aggression by the Russian Federation. Ratification on 18 July 2022 was preceded by several steps to advance women's and girls' protection from gender-based violence and, more generally, their equality with men. Many of these steps were accompanied by the Council of Europe's capacity-building and co-operation projects, which operated on the basis of Council of Europe standards in the area of violence against women and gender equality and supported policy development, legislative amendments and capacity building for the relevant Ukrainian authorities.[2]

3. The ratification of the Istanbul Convention during an active war of aggression is an expression of the Ukrainian authorities' strong desire to abide by international human rights standards in the area of women's rights and to subsequently uphold human rights and democracy. The step to ratify and begin implementation of the Istanbul Convention, despite the immense challenges posed by the war, demonstrates the political will on the part of the Ukrainian authorities, including at the highest political level, to apply the convention's far-reaching provisions also during times of conflict in line with Article 2, paragraph 3, of the Istanbul Convention. This provision provides for the continued applicability of the convention's obligations during armed conflict in addition to the principles of international humanitarian law and international criminal law, which are particularly relevant to affirm individual criminal responsibility for violence that occurs during armed conflict. This is especially relevant for crimes of violence committed largely, but not exclusively, against women, such as rape and sexual violence. In this regard, GREVIO wishes to point to the judgment of the European Court of Human Rights in *Ukraine and the Netherlands v. Russia*, in which the Court found a pattern of "widespread rape of women and girls in occupied areas" committed with "extreme violence" and which concluded that sexual violence forms "part of a military strategy to dehumanise, humiliate and break the morale of the Ukrainian population, as individuals and as a community, and to assert dominance over Ukrainian sovereignty".[3]

4. GREVIO notes that the ongoing war of aggression imposes difficulties and certain limitations on the implementation of the convention by Ukraine. These relate not only to resource constraints, both in terms of human and financial resources, but also to the displacement of large sections of the population, the safety and security concerns for professionals responding to violence against women, especially those operating near the front lines, and the many obstacles the authorities encounter in delivering services to the populations affected by the war, including women victims of violence.

5. Mindful of these limitations, the present report aims to support the Ukrainian authorities in their effort to implement the Istanbul Convention in the current context of the war of aggression by the Russian Federation and beyond, with a view to ensuring the convention's comprehensive implementation in the future. It is intended to offer impetus to the Ukrainian authorities to pursue their

2. Combating Violence against Women in Ukraine (COVAW), phases I-III.
3. *Case of Ukraine and the Netherlands v. Russia*, Applications Nos. 8019/16, 43800/14, 28525/20 and 11055/22, judgment of 9 July 2025, paragraph 1 078.

wide-ranging efforts to provide the convention's legal standards with meaning for all women and girls in Ukraine.

6. In terms of the territorial scope of application of the Istanbul Convention, GREVIO acknowledges that "the implementation by Ukraine of the obligations under the Convention in the temporarily occupied territories, in the Autonomous Republic of Crimea and in the city of Sevastopol is not guaranteed until the complete restoration of the constitutional order by Ukraine in these territories", as stated by Ukraine upon ratification.[4]

B. Scope of application of the convention and definitions (Articles 2 and 3)

7. In light of the scope of the Istanbul Convention set out in its Article 2, paragraph 1, the first baseline evaluation focuses on measures taken in relation to all forms of violence against women, including domestic violence, which affects women disproportionately. Article 3 of the Istanbul Convention sets out key definitions of concepts that are fundamental to its implementation. According to paragraph *a*, the term "violence against women" refers to "all acts of gender-based violence that result in, or are likely to result in, physical, sexual, psychological or economic harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life", whereas the expression domestic violence is to be understood as referring to "all acts of physical, sexual, psychological or economic violence that occur within the family or domestic unit or between former or current spouses or partners, whether or not the perpetrator shares or has shared the same residence with the victim". The definition of "gender-based violence against women" offered in paragraph *d* of Article 3 seeks to ensure more clarity regarding the nature of the violence covered by explaining that this is "violence that is directed against a woman because she is a woman or that affects women disproportionately".

8. Hence, the violence addressed by the Istanbul Convention differs from other types of violence in that the victim's gender is the primary motive. It is violence that is perpetrated against a woman that is both the cause and consequence of unequal power relations based on perceived differences between women and men that lead to women's subordinate status in the public and private spheres. In accordance with the definition given in Article 3, paragraph *b*, Chapter V of the convention specifies the forms of violence against women that are to be criminalised (or, where applicable, otherwise sanctioned). These are psychological violence, stalking, physical violence, sexual violence, including rape, forced marriage, female genital mutilation, forced abortion, forced sterilisation and sexual harassment. Owing to the seriousness of domestic violence, Article 46 of the convention requires ensuring that the circumstance in which the offence was committed against a former or current spouse or partner, by a member of the family, a person cohabiting with the victim or a person having abused her or his authority, may entail a harsher sentence either as an aggravating circumstance or a constituent element of the offence.

9. GREVIO welcomes the fact that the Ukrainian authorities had already started taking measures before ratifying the Istanbul Convention to better align the Ukrainian legislation with the provisions of the Istanbul Convention, in particular through the 2017 Law on Preventing and Combating Domestic Violence (referred to as "the law on domestic violence"). In this law, domestic violence is defined as "an act (action or failure to act) of physical, sexual, psychological or economic violence committed in the family or within the place of residence or between relatives, former or current spouses or between other individuals who share (shared) a residence as one family but are (were) not in the family or marital relations, regardless of whether the person who perpetrated domestic violence lives (lived) in the same place as the victim, as well as threats of such acts". Two definitions of domestic violence have subsequently been introduced in legislation: in the Code of Administrative Offences and in the Criminal Code where it is defined as involving physical,

4. See the declaration made by Ukraine upon ratifying the Istanbul Convention on 18 July 2022.

psychological or economic violence.[5] While welcoming the continued efforts to better align definitions with those provided in the Istanbul Convention, GREVIO notes with concern that the co-existence of several definitions of domestic violence introduces uncertainty as to which law should be applied in cases of domestic violence.[6]

10. Moreover, GREVIO notes with satisfaction that Article 173-6 of the Code of Administrative Offences also provides a definition of gender-based violence, covering acts of a physical, psychological or economic nature committed against a person because of their gender or stereotypical ideas about social roles of women and men in society. GREVIO welcomes the inclusion of such a definition in the Ukrainian legal framework, highlighting the gender-based nature of violence against women. It is, however, unclear what forms of gender-based violence against women are covered under this definition. This lack of clarity translates into uncertainty among the professionals concerned regarding the use of this definition in practice and about the forms of violence against women that it encompasses. While GREVIO acknowledges the fact that the introduction of this definition as a separate administrative offence in the Ukrainian legal order is recent and that raising awareness of gender-based violence among all relevant professionals may require time, it underlines the importance of ensuring a shared understanding of violence against women as violence that affects women because they are women, or that disproportionately affects them, and of its different manifestations as part of a continuum of violence experienced across a woman's lifetime. It is also essential to ensure that existing definitions allow all forms of violence covered by the Istanbul Convention to be tackled. In this context, GREVIO notes with interest the launch by the National Training Centre for Gender-Based Violence Response of training courses on the application of the existing definitions with a view to promoting a uniform application of the law and a gender-sensitive approach in the work on violence against women.[7]

11. **While commending the Ukrainian authorities' efforts to adopt definitions in line with the Istanbul Convention, GREVIO strongly encourages them to take further steps to ensure that existing definitions are fully aligned with those of the Istanbul Convention, to simplify the existing legal framework on domestic violence to ensure greater clarity and to pursue efforts to develop a common recognition and understanding, based on existing definitions, of the phenomenon of violence against women as a form of gender-based violence.**

C. Fundamental rights, equality and non-discrimination (Article 4)

1. Gender equality and non-discrimination

12. Policies to prevent and combat violence against women are embedded in the overall objective of promoting gender equality in Ukrainian society, which GREVIO welcomes. In 2022, a State Strategy for Ensuring Equal Rights and Opportunities for Women and Men until 2030 was adopted. It includes a section on the right of women and girls to live free from violence and foresees measures to expand the network of specialist support services for victims, strengthen the co-ordination of the response provided to victims by public services, ease access of victims to free legal aid, improve data collection on violence against women and improve the response to violence committed in the digital sphere. It also highlights the need for a gender-sensitive approach in humanitarian support as well as in the post-war recovery plans. The promotion of gender equality has been co-ordinated, since 2017, at the highest political level, under the auspices of the

5. Article 173-1 of the Ukrainian Code of Administrative Offences defines domestic violence as: "committing domestic violence, i.e. intentionally committing any act (action or failure to act) of a physical, psychological or economic nature … resulting in harm to the physical or mental health of the victims". Article 126-1 of the Criminal Code states: "domestic violence, i.e. the intentional systematic infliction of physical, psychological or economic violence against a spouse or former spouse or another person with whom the perpetrator is (was) in a family or close relationship, which results in physical or psychological suffering, health disorders, loss of working capacity, emotional dependence or deterioration of the quality of life of the victim". These definitions were introduced through Law 3733-IX of 19 December 2024, the Law on Amendments to the Code of Ukraine of Administrative Offences and Other Laws of Ukraine in Connection with the Ratification of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence.
6. See also Article 33, Psychological violence, and Article 35, Physical violence.
7. See Article 15, Training of professionals.

Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine. In 2017, the post of Government Commissioner for Gender Policy was created, which plays a key role in designing and implementing policies to promote gender equality and to prevent and combat violence against women. Additionally, GREVIO notes with interest that, in 2025, a report was released highlighting Ukraine's performance in the field of gender equality against European Union standards, revealing that Ukraine scores 61.4 out of 100, positioning it 20th among 28 countries.[8] Measures have also been taken to promote gender equality in different areas. In particular, gender equality offices have been set up in different administrations and in schools and universities.[9]

2. Intersectional discrimination

13. Article 4, paragraph 3, of the convention requires parties to secure the implementation of their undertakings under the convention without any discrimination. This provision provides an open-ended list of grounds of discrimination that draws on that of Article 14 of the European Convention on Human Rights as well as the list contained in its Protocol No. 12[10] and, in addition, includes the grounds of gender, sexual orientation, gender identity, age, state of health, disability, marital status, and migrant or refugee status or other status. This obligation stems from the realisation that discrimination of certain groups of women, for example at the hands of law-enforcement agencies, the judiciary or service providers, is still widespread.[11]

14 GREVIO welcomes the recognition by the Ukrainian authorities of the importance of paying specific attention to the needs of women exposed to intersectional discrimination. The State Strategy for Ensuring Equal Rights and Opportunities for Women and Men for the period up to 2030 and the National Action Plan 1325, adopted in order to implement UN Security Council Resolution 1325 on Women, Peace and Security, highlight some vulnerable groups of women in particular, such as HIV-infected women, older women, women with disabilities, women in rural areas and women from national minorities. They also mention victims of trafficking, sexual violence, rape and torture related to the war of aggression and internally displaced persons (IDPs), of which there were over 3 million as of April 2025.[12] Specific reference is also made to women war veterans who took part in military combat after the beginning of the war in 2022, some of whom are still being held in captivity in the territories of Ukraine temporarily occupied by the Russian Federation or in the Russian Federation and who are likely to be exposed to severe levels of violence.[13] Among the most vulnerable IDPs, Roma who moved from temporarily occupied regions in eastern Ukraine to the western parts of the county face extreme marginalisation and a lack of access to services, including services for women victims of violence, due to their lack of registration as IDPs and their persistent lack of identity documents.[14] Women with disabilities, the number of whom has increased as a result of the war, also face increased barriers to accessing support and protection from gender-based violence as a result of the lack of accessibility of existing services and a lack of specific services.

15. Moreover, the State Strategy for Ensuring Equal Rights and Opportunities for Women and Men for the period up to 2030 and the National Action Plan 1325 highlight the situation of women who left the country at the beginning of the war of aggression, whose vulnerability to violence has increased. Out of the 6.9 million people who left Ukraine because of the war, between 59% and 65% were women.[15] Their risk of exposure to gender-based violence, both on their way out of Ukraine

8. Gender Equality Index, Kyiv, 2025 (prepared by the Ukrainian Women's Fund). The methodology used for the EU Gender equality Index was adapted to the Ukrainian context.
9. See also Article 12, General obligations.
10. The discrimination grounds in question include sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.
11. See paragraphs 52-54 of the Explanatory Report to the Istanbul Convention.
12. See the State Strategy for Ensuring Equal Rights and Opportunities for Women and Men for the period up to 2030 (Multiple discrimination and the rights of women) and the National Action Plan 1325 (Objectives, Main Target Groups and Principles of the National Plan). For the figure regarding IDPs, see UNHCR: www.unhcr.org/refugee-statistics
13. See UN Human Rights Council, Report of the Independent International Commission of Inquiry on Ukraine, 11 March 2025.
14. Information obtained during the evaluation visit. See also UNFPA, "Voices from Ukraine: assessment, findings and recommendations", December 2024.
15. The percentage of women fluctuated from 65% at the end of 2022 to 59% in December 2024 (source: UNHCR: Ukraine Refugee Situation, Population movements, Factsheet #2, February 2025).

and in the countries of reception, is heightened, as GREVIO has noted.[16] Since 2022, around 950 000 people are estimated to have returned to Ukraine, not always to their place of initial residence.[17] As analysed further in subsequent sections of this report, women IDPs and those who have returned from abroad face higher risks of victimisation of the different forms of violence against women while at the same time experiencing heightened barriers to accessing support services.

16. In view of the limited human and financial resources and difficult working conditions in Ukraine, GREVIO acknowledges the difficulties in providing support services to women victims of violence who face an increasing range of problems and intersecting forms of discrimination. Nonetheless, it highlights the need to take further steps to strengthen the response to these groups of women and to fully integrate an intersectional approach into all policies and measures to prevent and combat violence against women.

17. **While welcoming the measures taken by the Ukrainian authorities to anchor measures to prevent and combat violence against women in policies on gender equality, GREVIO encourages them to strengthen their efforts to implement measures to prevent and combat violence against all women, to include the perspectives and needs of groups of women exposed to intersectional discrimination, and to provide them with appropriate protection and support.**

D. State obligations and due diligence (Article 5)

18. Aspects of the implementation of Article 5 of the Istanbul Convention are covered in Chapters V and VI of this report.

E. Gender-sensitive policies (Article 6)

19. Article 6 of the Istanbul Convention calls on the parties to include a gender perspective in the implementation and evaluation of the impact of its provisions and to promote and implement policies aimed at achieving equality between women and men and the empowerment of women. This obligation stems from the realisation that in order to put an end to all forms of violence covered by the scope of the convention, it is necessary to promote *de jure* and *de facto* equality between women and men. It also reflects the principle that violence against women is a consequence as well as a cause of gender inequality.

20. GREVIO welcomes the efforts made by the Ukrainian authorities since ratification of the Istanbul Convention to develop and implement a victim-centred and gender-sensitive approach to preventing and combating violence against women and domestic violence and welcomes more specifically the efforts to embed these aspects in gender equality policies. This is reflected in several policies and programmes, including in recent developments in the field of training of professionals and in the reinforcement of the network of specialist support services. However, GREVIO notes with concern that, in practice, violence against women continues to be widely seen as a private matter rather than a human rights violation and that there is a lack of awareness of the link between violence against women, gender stereotypes and the structural inequalities between women and men.[18] Many professionals in contact with women victims of violence still lack this understanding of the gendered nature of violence against women, which can lead to ineffective responses and to frequent secondary victimisation of the women seeking support and protection.

16. See for instance GREVIO's baseline evaluation report on Luxembourg, 2023, paragraph 231.
17. 316 000 of them have returned to a different place of origin than their original one. See UNHCR: Ukraine Refugee Situation, Population movements, Factsheet #2, February 2025.
18. See also Article 12, General obligations, and Article 13, Awareness raising.

21. **GREVIO strongly encourages the Ukrainian authorities to take measures to reinforce the gender perspective in all the measures taken to implement the Istanbul Convention. This gender-sensitive approach should be based on an understanding of the link between violence against women, gender stereotypes and the structural inequalities between women and men, in order both to address the specific needs of women victims and to raise awareness of professionals and the general population and to counteract the negative stereotypes against women that legitimise and sustain violence against them.**

II. Integrated policies and data collection

22. Chapter II of the Istanbul Convention sets out the core requirement for a holistic response to violence against women: the need for state-wide effective, comprehensive and co-ordinated policies sustained by the necessary institutional, financial and organisational structures.

A. Comprehensive and co-ordinated policies (Article 7)

23. Article 7 of the Istanbul Convention requires states parties to ensure that co-ordinated and comprehensive measures to prevent and combat violence against women address all forms of violence against women.

24. In addition to the State Strategy for Ensuring Equal Rights and Opportunities for Women and Men until 2030, mentioned above, Ukraine adopted in 2020 the State Social Programme for Preventing and Combating Domestic and Gender-based Violence until 2025. This state social programme, whose implementation is co-ordinated by the Ministry of Social Policy, Family and Unity of Ukraine, contains 14 objectives covering several relevant fields from prevention to data collection, service provision and prosecution of domestic violence and gender-based violence. The programme contains indicators for each of the relevant institutions, including for local and regional authorities, as well as indications on the sources of funding and amounts. GREVIO notes that preparation of the next state social programme is under way.

25. In parallel to the state social programme, successive national action plans on women, peace and security (referred to as "National Action Plans 1325") have been adopted since 2016 in order to implement UN Security Council Resolution 1325 on Women, Peace and Security. The current National Action Plan 1325 (2020-2025) includes combating gender-based violence and conflict-related sexual violence among its five strategic goals. The plan was revised in 2022 to take into account issues that arose from the war of aggression by the Russian Federation. A new revision is under way.

26. GREVIO welcomes the adoption of these strategic documents, which include measures in the fields of prevention, protection and prosecution and aim to address the root causes of violence against women. However, it is unclear whether all forms of violence against women covered under the Istanbul Convention are included in the strategies even though they refer to domestic violence and gender-based violence. Information brought to GREVIO's attention indicates, in particular, that while due attention is paid to conflict-related sexual violence – notably in the National Action Plan 1325 – less focus is put on sexual violence committed outside the context of the war and on other forms of violence against women, such as violence against women in the digital sphere.

27. Ukraine has built a robust system of co-ordination of policies and programmes to prevent and combat violence against women at national level. GREVIO notes that, under the national mechanism for gender equality operating under the auspices of the Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine, a commission of co-ordination has been in place since 2020. It gathers key national institutions, including the Ministry of Social Policy, Family and Unity of Ukraine, the Government Commissioner for Gender Policy, local authorities and civil society organisations; and it plays a role both in policy design and monitoring of all gender equality policies and measures, including violence against women. Furthermore, an Inter-Agency Working Group on Combating Sexual Violence related to the Armed Aggression of the Russian Federation against Ukraine and on Providing Assistance to Survivors was set up in 2022 to supervise and co-ordinate the implementation of the plan for the implementation of the framework of co-operation between the Government of Ukraine and the United Nations on the prevention of and response to conflict-related sexual violence.[19] The Inter-Agency Working Group operates under the leadership of the Government Commissioner for Gender Policy. GREVIO commends the efforts made by

19. See Article 36, Sexual violence, including rape.

the Ukrainian authorities to design efficient co-ordination mechanisms at national level, involving all the key institutions as well as civil society organisations and, as relevant, foreign organisations and donors active in preventing and combating violence against women.

28. Nonetheless, the effective co-ordination framework in place at national level is not replicated in all regions of Ukraine.[20] The strategic documents on violence against women give an important role to regional authorities (*oblast* authorities) in delivering support and protection to women victims of violence and in co-ordinating such action at the regional level. However, strong regional disparities have been reported in the response to violence against women and in the implementation of policies and measures to prevent and combat violence against women. While examples of effective regional policies exist, designed and implemented in co-operation with women's rights organisations, for example in the Lviv region, this is not the case everywhere.[21] Discrepancies between regions are reinforced by the context of the war of aggression, which puts the regions most affected by the war, and especially those close to the frontline, under extreme pressure. Stark differences in the response of self-governing bodies (municipalities) have also been brought to GREVIO's attention. While local authorities at this level are required to approve yearly programmes to prevent and combat violence against women, such programmes are often underfunded and the levels of implementation are variable. Moreover, GREVIO is deeply concerned about information indicating that in several regions, professionals in charge of responding to the needs of women victims of violence, including social workers, psychologists, law-enforcement officers or healthcare professionals, are exposed to high levels of exhaustion and burnout as a result of the war. A high turnover and an acute shortage of such professionals was consequently reported to GREVIO, which renders the task of implementing strategies and programmes to combat violence against women even more complex.[22]

29. Moreover, it appears that in areas near the frontlines and/or in territories that have been liberated from Russian occupation, the available resources are being shifted away from services for women victims of violence and towards the humanitarian needs of populations.[23] While fully acknowledging the pronounced challenges faced by local authorities in these areas, GREVIO highlights the importance of not only ensuring a minimum response to violence against women but of also firmly integrating prevention measures into the provision of humanitarian assistance throughout the country. Information brought to GREVIO's attention indicates that women and girls face a heightened risk of forms of violence such as sexual harassment, rape and sexual violence due to overcrowding in accommodation for IDPs, extended stays in bomb shelters or electricity cuts.[24]

30. **While welcoming the co-operation mechanism and the existing strategic policy documents on violence against women and while fully acknowledging the constraints resulting from the war of aggression by the Russian Federation, GREVIO strongly encourages the Ukrainian authorities to:**

- **a. reinforce existing measures for the Istanbul Convention's consistent implementation throughout the country;**
- **b. ensure that policies and programmes address all forms of violence against women covered by the Istanbul Convention, including in particular sexual violence committed outside of the context of the war and violence against women committed in the digital sphere.**

31. **Moreover, GREVIO strongly encourages the Ukrainian authorities to take measures to ensure that, in the provision of humanitarian assistance, due attention is paid to preventing violence against women and girls and to protecting them from violence**.

20. Information obtained during the evaluation visit.
21. See the submission by the Women's Perspectives centre, May 2025.
22. Information obtained during the evaluation visit.
23. Information obtained during the evaluation visit.
24. Information obtained during the evaluation visit.

B. Financial resources (Article 8)

32. Article 8 of the Istanbul Convention aims to ensure the allocation of appropriate financial and human resources for the implementation of integrated policies, measures and programmes carried out by public authorities and civil society and aimed at preventing and combating violence against women. In Ukraine, such funding is scarce, although the overall amounts spent are unknown. The war of aggression has further impacted the overall funding available to policies and programmes to prevent and combat violence against women, with funding being redirected to emergency responses and humanitarian needs resulting from the war. GREVIO was also alerted to the fact that the context of the war has led to resources, including funds provided by international donors, being redirected mostly to short-term projects, geared towards meeting humanitarian needs. In parallel, GREVIO notes that, regrettably, funding provided by international donors has been reduced.[25] This situation seriously undermines the sustainability of the work of NGOs providing specialist support services to women victims of violence.

33. GREVIO appreciates international donors' efforts to fund measures and projects to prevent and combat violence against women in Ukraine, including in the current context of the war of aggression. It also welcomes the readiness of the Ukrainian authorities to co-operate with the international community. Moreover, it also acknowledges the enormous challenges posed by the current context of the war and the different economic circumstances of parties to the Istanbul Convention. Nevertheless, it highlights the importance for state authorities to allocate appropriate public funds to services of a structural nature required by the Istanbul Convention and to fully acknowledge that responding to the need to protect women victims of violence in fulfilment of the convention's obligations requires sustained and continued financing efforts over time.

34. Despite the overall lack of available funding, GREVIO welcomes the fact that, in 2023 and 2024, additional resources were allocated to the network of specialist support services for women victims of violence, set up in 2021.[26] Nonetheless, it notes with concern the existence of substantial disparities in the funding that is available in different regions and cities for such services, given that the capacity of some local authorities to invest in services for women victims of violence is very limited. This is particularly the case for local authorities significantly affected by the war.[27]

35. Additionally, GREVIO notes that no tendering procedures are available that would allow different entities, including women's rights organisations providing specialist support services, to compete for public funds. Consequently, funds are not necessarily allocated to entities or organisations based on criteria such as the quality of the services provided or their adequacy in terms of the specific needs of women victims of violence.[28]

36. **While acknowledging the immense challenges resulting from the war of aggression in terms of funding priorities, GREVIO encourages the Ukrainian authorities to take steps to ensure the sustainability of the financial resources allocated to measures and policies for preventing and combating violence against women, including in particular to women's rights organisations that run specialist support services for women victims of all forms of violence, with a view to:**

- **a. ensuring that organisations providing specialist services to women victims of violence have access to suitable funding opportunities, for example through long-term grants based on transparent procurement procedures, in order to ensure continuity of care and preserve existing expertise;**
- **b. taking steps to identify more effectively the sums spent on preventing and combating violence against women by all relevant national and local institutions and ensure the adequate availability of funding across the country.**

25. Information obtained during the evaluation visit.
26. Information provided by the Ukrainian authorities. See Article 22, Specialist support services. The funding allocated to the network of specialist support services amounts to approximately €13 298 940.
27. Information obtained during the evaluation visit.
28. Information obtained during the evaluation visit.

C. Non-governmental organisations and civil society (Article 9)

37. GREVIO notes with satisfaction the regular and intense co-operation between the authorities and women's rights organisations at the national level. Information conveyed to GREVIO both by the authorities and civil society organisations indicates that NGOs are actively involved in policy and law-making processes through task forces, working groups and other consultation groups. The role and specific expertise of women's rights organisations seem to be acknowledged by the Ukrainian national authorities, in particular their unique capacity to provide a victim-centred response to women victims of violence and the crucial role they have been playing in this respect since the beginning of the war of aggression by the Russian Federation. GREVIO welcomes in particular the setting up of several NGOs dealing with the rights and needs of victims of conflict-related sexual violence.

38. Co-operation between the authorities and civil society organisations is also taking place in some regions, for example in the Lviv and Odessa regions, where NGOs have for long worked together with the authorities to improve the response to women victims of violence. Information brought to GREVIO's attention indicates, however, that co-operation between local authorities and women's rights organisations is not well established everywhere in the country and that in many places their crucial role in preventing and combating violence against women is not fully acknowledged.[29]

39. Moreover, GREVIO welcomes the fact that women's rights NGOs operate in close co-ordination and refer women victims of violence to each other, based on the victims' specific needs. According to indications from NGO representatives, the ratification of the Istanbul Convention led to an increase in the co-ordination of the work of NGOs, which is an encouraging development.

40. Additionally, GREVIO notes that since the beginning of the war of aggression by the Russian Federation, women's rights NGOs have been playing a major role in providing support and relief to internally displaced persons (IDPs), to women and children en route to safety outside the country, as well as returnees from abroad. This situation, combined with shrinking funding, makes it very difficult for these organisations to carry out their work in a sustainable manner. Therefore, GREVIO would like to commend the work done by NGOs in support of the authorities to meet the complex needs of the Ukrainian population, beyond those of women victims of violence, and to underline the importance of providing them with resources and support to carry out their essential work.[30]

41. **GREVIO encourages the Ukrainian authorities to ensure that the recognition of the essential role played by civil society and specialist women's rights organisations in preventing and combating violence against women, including conflict-related sexual violence, is translated into effective and consistent co-operation across all regions and territories.**

D. Co-ordinating body (Article 10)

42. The Ministry of Social Policy, Family and Unity of Ukraine, and in particular its Expert Group on Combating Trafficking in Human Beings, Domestic Violence and Gender Equality, was designated to serve as the co-ordinating body under Article 10 of the Istanbul Convention. The ministry is mandated to design policies for the implementation of the Istanbul Convention and to ensure implementation of existing strategic documents, in particular the State Social Programme for Preventing and Combating Domestic and Gender-based Violence until 2025. It co-ordinates the work of central and local authorities in this respect. The Ministry of Social Policy, Family and Unity of Ukraine, in its capacity as co-ordinating body under the Istanbul Convention, is integrated into the overall national mechanism for gender equality, under the auspices of the Deputy Prime Minister for European and Euro-Atlantic Integration of Ukraine.

29. Information obtained during the evaluation visit.
30. See Article 8, Financial resources.

43. While welcoming the overall efforts of the Ukrainian authorities to co-ordinate the work of the different institutions involved in preventing and combating violence against women, GREVIO notes with concern that the co-ordinating body faces serious shortages in human resources. Mindful of the strain that the war of aggression by the Russian Federation has placed on ministry staff and of the resulting increase in workload for those working on responses to violence against women, especially in view of the efforts made to respond to conflict-related forms of violence, GREVIO wishes to stress the key role a national co-ordinating body plays when it comes to translating the provisions of the Istanbul Convention into tangible policies and measures and making resource allocation more efficient. It is therefore necessary to equip the body with appropriate human and financial resources to perform its tasks. GREVIO also points to the fact that Article 10 of the Istanbul Convention requires the national co-ordinating body to co-ordinate the collection of data, analyse and disseminate such information, which the Ministry of Social Policy, Family and Unity of Ukraine does not appear to be doing.

44. As regards the evaluation and monitoring of laws, policies and measures for the implementation of the Istanbul Convention at national level, which are functions under Article 10 of the convention that are also to be entrusted to a designated entity, GREVIO notes that this is not a role currently assigned to the ministry or any other entity. Under Article 10 of the convention, the evaluation function is to be understood as implying an independent and scientific assessment, based on robust data, of whether measures taken achieve their aim and/or have any unintended or adverse effects. GREVIO notes that evaluation reports are mandated by strategic policy documents such as the National Action Plan 1325 and the plan for the implementation of the framework of co-operation between the Government of Ukraine and the United Nations on the prevention of and response to conflict-related sexual violence. This does not, however, replace the independent evaluation of all policies and measures to prevent and combat violence against women, including their implementation at the local level.

45. As GREVIO has had occasion to note, any evaluation of national policies and measures to prevent and combat violence against women and domestic violence shall be done on a regular basis by an independent entity using predefined and comparable indicators and involving civil society and women's rights organisations.[31] This is best ensured by separating the policy making and co-ordinating function from that of evaluation and monitoring. A situation in which close institutional ties exist between those who implement measures and bear political responsibility for them on the one hand and those who are supposed to evaluate the efficacy of those measures on the other, or even one in which the two groups are identical, provides fertile ground for (real or perceived) conflicts of interest and can weaken the analysis.

46. **Mindful of the context for implementation of the Istanbul Convention, which is marked by the war of aggression by the Russian Federation, GREVIO strongly encourages the Ukrainian authorities to take measures to enhance the co-ordination, implementation, monitoring and evaluation of policies and measures with regard to violence against women, in particular by:**

- **a. allocating, as far as possible, the necessary human and financial resources for these functions;**
- **b. setting up or designating an independent body to monitor and evaluate, on a regular basis, national policies and measures for preventing and combating violence against women and domestic violence, by co-ordinating the collection of robust data on the basis of comparable indicators covering the whole country, in close consultation with civil society and women's rights organisations.**

31. See GREVIO's baseline evaluation reports on Iceland, Bosnia and Herzegovina, Poland, Romania, Serbia, Slovenia and Switzerland, among others.

E. Data collection and research (Article 11)

47. Preventing and combating violence against women and domestic violence requires evidence-based policy making. The collection of systematic and comparable data from all relevant administrative sources is crucial in this regard, as is information on the prevalence of all forms of violence against women.[32]

1. Administrative data collection

a. Law-enforcement agencies and the justice sector

48. GREVIO notes with concern that the systematic collection of data across various sectors, disaggregated according to sex, age, relationship between the perpetrator and the victim and geographical location, mandated by the 2017 law on domestic violence, is not yet fully in place, although some steps to this extent have been taken. Data on administrative offences of domestic and gender-based violence are collected by the Ukrainian police in the Unified Register of Applications and Reports of Criminal Offences and Other Incidents related to Domestic Violence. It is unclear to GREVIO, however, what types of offences are recorded under the category of gender-based violence. Moreover, the lack of a clear definition of "offences related to domestic violence" may undermine data collection on domestic violence. Although these data on reported incidents are not made public, they can be accessed upon request. Data on violence against women are also recorded in the Unified Register of Pre-trial Investigations kept by the Prosecutor General's Office. Moreover, the Prosecutor General's Office has devised reporting forms on the activities of law-enforcement agencies in the field of domestic violence and offences connected to domestic violence with a view to obtaining a better overview of the situation concerning these forms of violence against women. GREVIO notes with satisfaction that data collected by the Prosecutor General's Office are disaggregated according to the sex and age of the perpetrators and victims and their relationship. Information on the number of protection orders issued is also included although it is not disaggregated by sex.[33] Data collected by the Prosecutor General's Office are publicly available.

49. However, similar data are not yet collected by courts and it is therefore not possible to follow a case throughout the judicial chain, from reporting to the police to the court decision, and to assess conviction, attrition and recidivism rates, or any shortcomings in the criminal law response. While some data are collected on domestic violence and gender-based violence committed under Article 126-1 of the Criminal Code and, to some extent, on failures to comply with protection orders, such data are not disaggregated according to the sex, age, relationship between the victim and the perpetrator and geographical location. Against this background, GREVIO notes with interest the plans to work towards a unified data-collection system for the justice sector and the willingness of the Ukrainian authorities to set up a data-collection system that is more in line with the requirements of the Istanbul Convention.

50. Additionally, GREVIO notes that the 2017 law on domestic violence foresees the creation of a unified state register of cases of domestic violence and gender-based violence with the aim of gathering information on cases of domestic violence, including information on the victims and perpetrators, to ease co-operation and co-ordination between the relevant professionals.[34] It notes, however, that the register has not yet been set up due to concerns over the protection of victims and witnesses that may arise from the large number of institutions and services who could access such a register. Initiatives aimed at improving the sharing of information between the relevant institutions are key to providing more effective and co-ordinated support to women victims of violence. However, it is essential to have the necessary data safeguards in place to avoid putting the safety of women victims of violence and their children at risk.

32. While this section discusses the main considerations related to data collection, Chapters V and VI also offer reflection on data related to specific criminal offences.
33. Data are also collected, through the free legal aid system, on women contacting free legal aid centres.
34. Article 16 of the 2017 law on domestic violence.

51. Data on the number of investigations into and prosecutions of conflict-related sexual violence are being collected by the Ukrainian authorities, but they currently only reflect a fraction of the number of such instances of violence experienced by women and men at the hands of Russian soldiers. This is linked to the shame and stigma associated with such experiences as well as the fact that many women and men exposed to conflict-related sexual violence live within or close to territories of Ukraine temporarily occupied by the Russian Federation, which puts them at risk when speaking out. GREVIO was alerted to the fact that administrative data collection on reported incidents of conflict-related sexual violence or the simple fact of collecting victims' testimonies with a view to building a case may present a risk to their safety if this is done in or near areas of Ukraine threatened by occupation by Russian armed forces. Additional safeguards to ensure data security will therefore need to be introduced in order to reduce the risk of facing repercussions for reporting experiences of conflict-related sexual violence by Russian armed forces.

b. Healthcare sector

52. GREVIO commends the collection by the Ukrainian authorities of data on the number of times contact is made by victims of domestic violence with healthcare institutions for medical assistance related to their experience of violence. Since 2021, such data have been collected on a yearly basis and disaggregated by the type of domestic violence (physical, sexual, psychological and economic violence), the sex and age of the victim, and whether they have a disability.[35] It appears, however, that no such data are collected regarding forms of violence against women committed outside the sphere of domestic violence.

c. Social services

53. While the national social services collect some information on the support provided to women victims of violence, the data-collection efforts are hampered by incomplete data sets from the regions owing to, among other factors, the lack of human resources to record the relevant information. Thus, GREVIO notes the plans by the Ukrainian authorities to develop new forms to report cases of violence against women and to digitise the process. It understands, however, that it will not be possible to implement such a project in the near future because of a lack of resources.

d. Data on the asylum procedure

54. The State Migration Service does not currently seem to collect information on the number of asylum claims submitted on the grounds of gender-related persecution.

55. **GREVIO strongly encourages the Ukrainian authorities to pursue efforts to develop a system of administrative data collection on all forms of violence covered by the Istanbul Convention in order to allow for evidence-based policy making. In doing so, they should:**

- **a. ensure that data collected by all relevant stakeholders (namely law-enforcement agencies, judicial authorities and healthcare facilities and social services) are disaggregated with regard to the sex and age of the victim and the perpetrator, their relationship, geographical location and the different forms of violence covered by the Istanbul Convention, and that information on the presence of children exposed to domestic violence is also included;**
- **b. harmonise data collection between law-enforcement agencies and the judiciary with the aim of, *inter alia*, allowing the assessment of conviction and attrition rates and of recidivism rates and enabling a thorough analysis of the pathway of cases through the criminal justice system chain – from initial contact with law enforcement through prosecutors' offices and finally to the courts;**

35. www.moz.gov.ua/uk/zvit-schodo-nadannja-medichnoi-dopomogi-postrazhdalim-vid-domashnogo-nasilstva.

c. introduce a data-collection system that allows the recording of the registration and outcomes of asylum claims made on the basis of gender-related persecution;

d. ensure that the process of collecting, storing and transforming collected data complies with standards on personal data protection, as stipulated in the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data.

2. Population-based surveys

56. GREVIO notes that in 2019 a survey on violence against women was conducted by the Organization for Security and Co-operation in Europe (OSCE), revealing a high prevalence of different forms of violence against women in Ukraine.[36] In 2022, another survey was carried out among public service employees, focusing on gender equality at work, including questions on sexual harassment at work. In 2023 and 2024, the National Social Service conducted a survey on access to services and assistance for victims of domestic violence and/or gender-based violence in order to collect data on the availability and effectiveness of support services for victims and to identify gaps in the coordination mechanism among entities implementing measures to prevent and combat domestic violence and gender-based violence.[37] In 2025, United Nations Population Fund (UNFPA) carried out a survey on domestic violence.[38] GREVIO also notes that the authorities plan to carry out surveys every two years to measure the implementation of the revised Sustainable Development Goals for the period up to 2030, including on the goal to reduce violence against women and domestic violence. While fully acknowledging that the current circumstances are not conducive to carrying out population-based surveys, GREVIO underlines the importance of regularly gathering information through such surveys on women's exposure to the various forms of violence covered by the Istanbul Convention. Population-based surveys are essential for understanding the level of prevalence of the different types of violence against women in Ukraine, and the possible reasons for not reporting, and for establishing more accurate prevention programmes and evidence-based policy making.

57. **GREVIO encourages the Ukrainian authorities to regularly conduct population-based surveys on all forms of violence against women covered by the scope of the Istanbul Convention.**

3. Research

58. Article 11, paragraph 1*b*, of the Istanbul Convention creates the obligation for parties to support research, out of the consideration that it is essential that parties base their policies and measures to prevent and combat all forms of violence covered by the convention on state-of-the art research and knowledge in this field. As a key element of evidence-based policy making, research can contribute greatly to improving day-to-day, real-world responses to violence against women and domestic violence by the judiciary, support services and law-enforcement agencies.[39]

59. Limited research is currently carried out on violence against women[40]. While acknowledging the challenges arising from the current situation, GREVIO underlines the importance for the authorities to support research to inform evidence-based policy making. Research contributes to a better understanding of the root causes and manifestations of violence against women, as well as women's help-seeking behaviour and any challenges and barriers to receiving support and protection. Research can help clarify and specify measures and tools of prevention. It can also

36. OSCE-led survey on violence against women: well-being and safety of women, Ukraine results report, 2019.
37. «Доступ до послуг та допомоги постраждалих від домашнього насильства та/або насильства за ознакою статі» | Пошук | Національна соціальна сервісна служба України.
38. www.drive.google.com/file/d/1h4ypRPlmX_fsM5N8AgJtJzGhzu4qzZJG/view; and UNFPA Ukraine: "Public opinion research on gender-based and domestic violence" 2025.
39. Explanatory Report to the Istanbul Convention, paragraph 77.
40. The Ministry of Social Policy, Family and the Unity of Ukraine with the support of UN Women conducts a study every two years on the impact of security challenges on girls and boys, women and men, taking into account the age, place of residence, and other social characteristics. One of the areas covered in the research is related to conflict-related sexual violence and other forms of gender-based violence committed in this context.

contribute to assessing the effectiveness of the judicial response to the different forms of violence against women and to identifying and understanding any existing legislative or policy gaps. This is particularly relevant for forms of violence beyond domestic violence. Moreover, in the context of the ongoing war of aggression by the Russian Federation, research is important to understand the differentiated impact of the war on women and girls in terms of their exposure to and experiences of gender-based violence and, in particular, the prevalence of intimate partner violence among women whose spouse/partner is serving or has served in the military.[41]

60. **GREVIO encourages the Ukrainian authorities to conduct, commission and support research, including quantitative and qualitative studies, on the different forms of violence against women, addressing also the experiences of women exposed to intersectional discrimination, such as women with disabilities, migrant women, women from national or ethnic minorities, women who are IDPs and LBTI women.**

41. See also Article 13, Awareness raising.

III. Prevention

61. This chapter contains a number of general and more specific obligations in the area of prevention. These include early preventive measures such as changing social and cultural patterns of behaviour of women and men, eradicating prejudices and gender stereotypes, and measures to involve all of society, including men and boys, in achieving gender equality and the prevention of violence against women. It also includes more specific preventive measures such as awareness raising and campaigning, ensuring the adequate training of all professionals, education in schools and other settings, and, last but not least, measures such as perpetrator programmes to prevent further victimisation.

A. General obligations (Article 12)

62. Article 12 delineates the fundamental foundations of the parties' duty to prevent violence against women. These include the parties' determination to promote changes in the social and cultural patterns of behaviour of women and men with a view to eradicating prejudices, customs, traditions and all other practices that are based on the idea of the inferiority of women or on stereotyped roles for women and men. Moreover, flowing from the premise that violence against women is a cause as much as a consequence of gender inequality, Article 12 further requires that parties adopt specific measures to empower women and to achieve greater gender equality in order to reduce women's vulnerability to violence.

63. GREVIO welcomes the efforts made by the Ukrainian authorities in recent years to raise awareness in society of violence against women as a human rights violation and a societal problem that requires a public response. Efforts to this extent have, in particular, taken place in the context of the process of ratification of the Istanbul Convention. Moreover, in 2023, the Ukrainian Government launched a communication strategy on gender equality that included measures to combat gender stereotypes. However, it appears that gender stereotypes and prejudices concerning women and men's roles in society remain prevalent in large segments of society. Domestic violence is still all too often considered a private matter and acceptance remains high.[42] In this context, GREVIO considers it of particular importance to develop primary prevention measures that seek to empower not only women and girls to recognise controlling and abusive behaviour but also men and boys to learn, reflect and challenge the harmful attitudes and behaviours they may display. To achieve the shift towards recognition of violence against women as a public matter, and a form of discrimination against women, it is important to invest in efforts that place the onus to act on those who engage in, or are bystanders to, violence against women and girls, and to address restrictive and harmful gender norms that exist for men and women in all areas. This can be done through comprehensive preventive measures delivered through the media, politics, leisure activities, education and workplaces.

64. The need for the above is all the more important in view of the growing concerns about the possible long-term harmful consequences on young people in Ukraine of the ongoing war of aggression. Experiences from other countries that have endured armed conflict show that the legacy of war can include strengthening and perpetuating attitudes and views opposing gender equality and glorifying the use of strength and violence, which in turn can lead to increased violence against women.[43] Such unwanted consequences of the war can be mitigated through preventive work among young people, in particular by deconstructing gender stereotypes, promoting gender equality and non-violent resolution of conflicts in domestic contexts.

42. See for example the OSCE-led survey on violence against women: well-being and safety of women, OSCE, 2019, pp. 17-21.
43. See for example, Siobhan McAlister, Gail Neill, Nicola Carr and Clare Dwyer, "Gender, violence and cultures of silence: young women and paramilitary violence", *Journal of Youth Studies*, 2021. See also UN Women, "Young Women in Peace and security: at the intersection of the YPS and WPS agendas. Progress study on youth, peace and security", UN Women, New York, April 2018.

65. Moreover, GREVIO notes with concern the increasing connection that is being made by the authorities between active military service and severe domestic violence perpetration in Ukraine.[44] It welcomes the measures taken by the Ukrainian authorities to actively prepare demobilised men, war veterans or those on leave from the frontlines for their return to civil life with a view to reducing the risk of violence or substance abuse as a result of any trauma or exposure to serious war-related violence. However, more extensive measures will be needed to comprehensively address this phenomenon.

66. **GREVIO strongly encourages the Ukrainian authorities to strengthen the primary prevention of all forms of violence against women by stepping up their efforts to eradicate gender stereotypes and attitudes that condone or accept such violence. This should be done with a view to involving men and boys in these efforts and on the basis of the measures set out in Council of Europe Recommendation CM/Rec(2019)1 of the Committee of Ministers to member States on preventing and combating sexism.**

B. Awareness raising (Article 13)

67. GREVIO notes that the Ukrainian authorities have carried out information and awareness-raising campaigns on violence against women, especially in the context of the International Day on the Elimination of Violence against Women (25 November). However, it notes that such campaigns have mostly focused on physical violence against women and less so on other forms of violence, notably psychological violence, economic violence or stalking and sexual harassment, including in their digital dimension. As a result, these are not always identified by women victims as a form of gender-based violence. International organisations working in Ukraine and several women's rights NGOs also implement awareness-raising campaigns, including in places such as public transportation and schools. For example, a campaign on the risks of victimisation during power cuts was launched by one NGO.[45] GREVIO also notes the information campaigns to encourage women victims of conflict-related sexual violence to report. Despite these initiatives, GREVIO notes with concern that existing initiatives do not always extend to rural areas, especially those located near the frontlines, and to groups of women such as older women, women with disabilities or Roma women, despite the work of Roma community mediators.[46] More efforts should also be made to raise awareness of young people about violence against women, including violence committed in the digital sphere.

68. The prevalence of violence against women in Ukraine appears to have been compounded by the war of aggression by the Russian Federation.[47] GREVIO takes note of information highlighting the high levels of stress to which people in Ukraine have been exposed since the beginning of the war of aggression and the fact that daily exposure to violence may lead to higher levels of acceptance of violence, including violence against women, in society in general.[48] Indeed, GREVIO was alerted to the fact that women's exposure to domestic violence has increased in two ways: first-time victimisation of women who had not previously experienced domestic violence; and increased frequency and intensity experienced by women with a history of being abused. Moreover, physical and sexual violence often comes to replace psychological violence.[49] It appears that this increase or escalation in domestic violence cases is largely due to the experiences and trauma related to the war, particularly among people who were in areas close to the frontlines, including of military personnel involved in the war and veterans. At the same time, the context of fending off a war of aggression makes it very difficult for women to report violence committed by men serving in the Ukrainian military.

44. Information obtained during the evaluation visit.
45. Information obtained during the evaluation visit.
46. Information obtained during the evaluation visit. See also Voice of Romni, Identity, gender aspects and traditions, study of the cases in Roma communities, 2024.
47. Information obtained during the evaluation visit.
48. Information obtained during the evaluation visit.
49. Information obtained during the evaluation visit. See also the submission by the Women's Perspectives centre, pp. 5, 36 and 37.

69. GREVIO welcomes the fact that the Ukrainian authorities are aware of this consequence of the war and that measures have been taken to mitigate the impact of post-traumatic stress disorder among military personnel and to prevent the commission of domestic violence, such as the dissemination of short videos on violence against women among military personnel serving on the frontline and the setting up of a "decompression procedure", which involves providing psychological support to soldiers before they return to their families. A helpline and an internet platform are also available to respond to the needs of demobilised soldiers and their families. While understanding that there is currently a shortage of funds to roll out such measures, GREVIO considers it crucial that they are pursued and expanded.[50]

70. Furthermore, despite the substantial efforts made by the Ukrainian authorities to provide support to victims of conflict-related sexual violence, information brought to GREVIO's attention indicates that the social stigma attached to this type of violence is high and, consequently, presents a barrier to women's (and men's) reporting of such crimes and to seeking support. It is therefore essential to continue to raise awareness within society that, despite the ongoing war of aggression, violence against women is not a private matter, that all victims deserve support and protection, that they shall not carry the burden of stigma and that shame belongs to the perpetrators. In this respect, GREVIO draws attention to the judgment in the case of *Ukraine and the Netherlands v. Russia*, in which the Court stressed that "the systematic rape of women as a weapon of war causes unthinkable physical, emotional and psychological suffering" and that "victims risked double victimisation, not only sustaining potentially dangerous and long-lasting injuries and trauma but also running the risk of stigmatisation and rejection by their families and communities".[51]

71. **GREVIO strongly encourages the Ukrainian authorities to carry out, on a regular basis, campaigns to increase awareness among the population of the different manifestations of all forms of violence covered by the Istanbul Convention, beyond domestic violence, in co-operation with women's rights organisations. These campaigns should address underlying patriarchal and stereotypical attitudes towards women, portray a gendered understanding of violence against women and highlight the need for the accountability of perpetrators. They should also aim to reduce the stigma experienced by women victims of violence, including stigma around conflict-related sexual violence and the increasing levels of domestic violence by family members who have experienced war-related trauma, including active military personnel or war veterans.**

72. **Moreover, GREVIO encourages the Ukrainian authorities to take all possible measures to raise awareness of violence against women among men serving in the military.**

C. Education (Article 14)

73. Attitudes, convictions and behavioural patterns are shaped very early in life. Educational establishments therefore have an important role to play in promoting equality between women and men and human rights. Article 14 therefore requires the design of teaching material that promotes equality between women and men, non-stereotyped gender roles, mutual respect, non-violent conflict resolution in interpersonal relationships and the right to personal integrity and that informs learners of the different forms of gender-based violence against women.

74. In the framework of their policy to promote gender equality, the Ukrainian authorities have in recent years launched several initiatives in the field of education. First, an audit of textbooks on gender stereotypes and forms of discrimination against women was carried out after the adoption, in 2020, of an order of the Ministry of Education and Science of Ukraine requiring a screening for discriminatory elements in textbooks published with state funding.[52] GREVIO welcomes this

50. See also Article 16, Preventive intervention and treatment programmes.
51. *Case of Ukraine and the Netherlands v. Russia*, Applications Nos. 8019/16, 43800/14, 28525/20 and 11055/22, judgment of 9 July 2025, paragraph 1 078.
52. Order No. 931 of the Ministry of Education and Science of Ukraine of 20 July 2020 "on the approval of the procedure for assigning standardisation marks for education literature and educational programmes".

development, which, according to the information brought to its attention, led to an improvement in the quality of textbooks when it comes to gender stereotypes and prejudice against women.[53] Moreover, all new textbooks to be published are to be screened for possible discriminatory content.

75. Additionally, in 2024, an audit was carried out within the Ministry of Education and Science to identify obstacles to gender equality. Similar gender equality audits have been carried out in some schools in the cities of Kyiv and Kharkiv.[54] And in March 2025 a new action plan for 2025-2027 was adopted to implement the Strategy for the Implementation of Gender Equality by Education by 2030, which aims to, *inter alia*, integrate a gender-sensitive approach into education at all levels.

76. While the availability of teaching material free of gender stereotypes is a key step in preventing violence against women, it is essential that teachers are adequately trained to use such material and that they are made aware of stereotyped narratives regarding the roles of women and men and prejudices against women. In December 2024, the Ministry of Education and Science, together with the NGO La Strada Ukraine, carried out an online survey on gender stereotypes among educational staff in secondary education, involving around 15 000 respondents. The results of the survey demonstrated the persistence of widespread stereotypes among educational professionals. Against this background, GREVIO notes with interest that the Ukrainian authorities plan to enhance teacher training.

77. Teaching on issues such as gender equality, non-stereotyped gender roles, mutual respect, the right to bodily integrity or consent is optional. Information provided to GREVIO indicates that, in practice, teaching on the principles listed under Article 14 of the Istanbul Convention remains limited and depends on the willingness of individual teachers. In some instances, it is ensured only by way of awareness-raising courses being supplied by women's rights NGOs upon the request of schools.[55] The same applies to comprehensive sexuality education. Moreover, information brought to GREVIO's attention suggests that in some schools and regions opposition to the teaching of issues such as gender equality, gender-based violence against women and sexuality persists.[56] In this context, GREVIO wishes to stress that the provision of age-appropriate sexuality education during schooling is recognised as one of the most powerful primary prevention tools for violence against women and girls.[57] In the context of such courses, pupils can be taught about the notion of freely given consent in sexual relations and the impact of sharing intimate images of oneself or others. The aim is also to strengthen young people's commitment to fundamental principles such as gender equality, mutual respect and non-violent conflict resolution.

78. At the level of tertiary education, GREVIO commends the adoption, in September 2025, of methodological recommendations on the implementation of policies to combat discrimination and sexual harassment and to promote equality in institutions of higher education in Ukraine. This guidance was drafted by the Ministry of Education and Science in close co-operation with women's rights organisations and experts. It aims to promote gender equality and non-discrimination in universities and to encourage the adoption of internal policies to prevent sexual harassment and discrimination and to provide an adequate, trauma-informed and victim-sensitive response to such forms of violence, of which women are frequently victims in institutions of higher education.

79. Additionally, GREVIO notes that school psychologists appear to play an important role in detecting and reporting violence against women. It is informed that, in 2023, 23 805 reports of domestic violence were filed, based on reports from teachers, pupils or psychologists themselves.[58] The role played by these professionals can greatly help to activate the potential that schools offer in

53. Information obtained during the evaluation visit.
54. Information provided by the Ukrainian authorities during the evaluation visit.
55. Information obtained during the evaluation visit.
56. See UNFPA: Sex education in Ukraine: What parents and teachers think about it, 2020.
57. Michau L. et al., "Prevention of violence against women and girls: lessons from practice", *The Lancet* 385.9978 (2015), pp. 1672-1684; Fulu E. et al. (2014), "What works to prevent violence against women and girls", *Evidence review of interventions to prevent violence against women and girls Pretoria: Medical Research Council*, 1, 580-1589.
58. Information provided by the Ukrainian authorities during the evaluation visit.

terms of identifying child victims and witnesses of domestic violence and other forms of gender-based violence.

80. **While welcoming measures taken to eliminate gender stereotypes and prejudices in education, GREVIO strongly encourages the Ukrainian authorities to strengthen efforts to ensure the teaching of the elements listed in Article 14 of the Istanbul Convention, including on the various forms of gender-based violence against women and girls.**

D. Training of professionals (Article 15)

81. The standard set by the Istanbul Convention in its Article 15 is that of systematic initial and in-service training of the relevant professionals who deal with victims or perpetrators of all acts of violence. The training that is required must cover the prevention and detection of such violence, equality between women and men, the needs and rights of victims and the prevention of secondary victimisation.

82. Since the ratification of the Istanbul Convention, the Ukrainian authorities have taken measures to enhance the level of training of several categories of professionals dealing with women victims of violence. GREVIO welcomes in particular the introduction in 2023 by the National Agency on Civil Service of training programmes on preventing gender-based violence and domestic violence, aimed at a range of professionals working with victims of violence against women. GREVIO also notes with satisfaction the setting up in 2023 of the National Training Centre for Gender-Based Violence Response, under the auspices of the Higher School of Public Governance and with the support of the UNFPA. This centre was initially created to provide training on violence against women to social workers, who do not have the status of civil servants and therefore do not have access to the training provided by the National Agency for Civil Service on these issues.

83. This new training centre responds to the training needs of a range of relevant professionals, including the providers of services to women victims of violence. The training it offers is partly delivered through interdisciplinary sessions. GREVIO welcomes this approach and underlines the high relevance of interdisciplinary training and the gathering of different professionals involved in providing support to women victims of violence, as this significantly strengthens co-operation. Since 2023, 10 specialised training programmes have been developed and around 3 000 civil servants and service providers have been trained, at national and regional levels. While they mainly focus on domestic violence, training programmes offered by the national centre also cover, to a lesser extent, rape, sexual harassment and conflict-related sexual violence. Teaching on the Istanbul Convention is also included. Moreover, GREVIO notes with interest that a new training programme on gender-sensitive communication was made available to all relevant professionals. The participation in training courses provided by the training centre, while not compulsory, allows professionals to obtain credits as part of the existing civil servants' training accreditation system.

84. GREVIO commends the Ukrainian authorities for this innovative approach to training on violence against women through a dedicated national centre that will overcome the fragmentation of training – a concern GREVIO was alerted to. This is an important step in enhancing training of professionals in contact with women victims of gender-based violence. In this context, it wishes to highlight the importance of ensuring that the training imparted by the national centre covers issues such as gender stereotypes; the difference between conflict and violence; the detection of victims; the rights and needs of victims; the prevention of secondary victimisation, the need for effective co-operation centred around the victims' needs; the content and objectives of perpetrator programmes; the impact of violence on children exposed to it; how to collaborate in an efficient network; and violence against women exposed to intersectional discrimination. It is also important to tap into the expertise of women's rights organisations in the provision of training.

85. As regards health professionals, licensing requirements have existed since 2019 when the provision of healthcare to women victims of violence was regulated, which GREVIO welcomes. This triggered requests for training, and in 2021 measures were taken to enhance the training of health

professionals on violence against women more generally.[59] With the beginning of the war of aggression by the Russian Federation, conflict-related sexual violence was added. While training on violence against women is currently not mandatory for health professionals, this is foreseen in the new Government Strategy for the Development of the Healthcare System until 2030 with a target set of at least 50% of healthcare professionals trained on this topic.[60] In this context, GREVIO welcomes the adoption, in April 2025, of an Order of the Ministry of Health on certifications of healthcare professionals which provides that all of these professionals are required to undergo training at least once during the certification period, including on violence against women related issues.[61] Moreover, in 2024, a reference book was compiled listing the practical skills that medical professionals should possess when treating patients with experiences of domestic violence and conflict-related sexual violence. Forensic doctors have also had access to training on violence against women to issue medical certificates and expert forensic opinions for use as evidence in court. This includes training on documenting bodily injury in cases of torture, in compliance with the UN Manual on Effective Investigation and Documentation of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment.[62]

86. Police officers follow one compulsory course on violence against women and gender equality as part of their initial training. Moreover, they have access to training provided by the National Training Centre for Gender-Based Violence Response. However, information made available to GREVIO indicates that many police officers across the country still lack adequate understanding of and knowledge about violence against women and its gendered nature and are not sufficiently trained in applying a human rights-based and victim-centred approach.[63] GREVIO notes with particular concern the reported lack of training on sexual violence and sexual harassment.[64] It notes, however, that following the introduction of sexual harassment to the legislation, training is to be provided.[65]

87. Prosecutors follow, as part of their initial training, one training module on human rights at pretrial investigation stage, including information on the Istanbul Convention. Moreover, online training modules on several aspects of violence against women are available and training has been provided, in co-operation with international organisations and women's rights organisations, on the investigation of violence against women cases.[66] However, training on the different forms of violence against women is not compulsory during initial and in-service training.[67]

88. As regards conflict-related sexual violence, GREVIO welcomes the fact that the capacity of police officers, prosecutors and members of the Security Service of Ukraine to respond to this type of violence has significantly increased since the beginning of the war of aggression. Important support has been provided by foreign donors and international organisations to enhance the skills of these professionals and their capacity to adopt a victim-centred and trauma-informed approach in

59. For example, online training tools from the World Health Organization (WHO) have been made available to doctors in the primary healthcare system.
60. Strategy for the development of the healthcare system for the period up to 2030 and approval of the operational plan for its implementation in 2025-2027.
61. The topics listed in the Order no. 650 of 16 April 2025 include: the procedure for conducting and documenting the results of medical examinations, documenting bodily injuries sustained by victims of domestic or other forms of violence, cruel/inhuman treatment (punishment) or torture, human trafficking, persons released from captivity or affected by the Russian Federation's military aggression against Ukraine, communicating with victims, organising measures to prevent domestic violence and violence against women, early detection of signs of such violence, referral skills, and the competencies of entities implementing measures in the field of preventing and countering domestic violence and gender-based violence. In addition, healthcare workers of all specialties employed in state-run specialized institutions where forensic medical examinations are conducted are required to undergo professional development at least once per certification period, specifically in the following areas: ethical issues (gender equality and prevention of discrimination, stigmatisation, confidentiality, vulnerability, the impact of war, empathy, bioethics).
62. Also known as the Istanbul Protocol, adopted in 2004 and revised in 2022.
63. See also Article 50, Immediate response, prevention and protection.
64. Information obtained during the evaluation visit.
65. Law of Ukraine on Amendments to the Code of Ukraine of Administrative Offences and Other Laws of Ukraine in Connection with the Ratification of the Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence, 22 May 2024, No. 3733-IX.
66. See the state report, addendum submitted in 2025, p. 6.
67. Including the Council of Europe HELP course on violence against women.

such cases. GREVIO commends this development and notes with satisfaction the emphasis placed by the Prosecutor General's Office on the protection, needs and rights of victims. It notes with regret the difficult circumstances in which prosecutors operate and the resulting high turnover or shortage of staff. GREVIO thus points to the need to ensure that any training designed or provided, including by foreign donors and external partners, closely meets the fast-evolving needs of the Ukrainian law-enforcement agencies. Among these are training of frontline police officers to detect and handle cases of conflict-related sexual violence and further follow-up to initial training.[68] It is also important to ensure that professionals involved in investigating and prosecuting conflict-related sexual violence, and other war crimes, have access to adequate psychological support and supervision.

89. Last, GREVIO wishes to emphasise the importance of a comprehensive and adequate understanding of conflict-related sexual violence for any law-enforcement officers assigned to such cases. This includes the understanding of women's specific victimisation on account of their being women, but also the desire to dominate and control through the humiliation of the enemy population. It is often accompanied by extreme cruelty and results in serious trauma, which in turn impacts on investigations and prosecutions.[69] Any knowledge and skills developed in handling cases of conflict-related sexual violence in a victim-centred and trauma-informed manner should be applied in relation to all other forms of violence against women, notably sexual violence committed in the context of intimate partner violence or in other circumstances.

90. As for the training of the judiciary, following a reform in 2024 of the training of judges, training on violence against women and gender stereotypes is mainstreamed across all training courses. This training is compulsory for all candidate judges. It focuses in particular on the legislative changes in the field of violence against women since ratification of the Istanbul Convention. Additionally, incumbent judges must undergo 40 hours of training every three years, choosing from a voluntary training catalogue. Training has also been given on preventing gender-based discrimination in courts.

91. Despite the above, gender bias and stereotypes continue to exist among the judiciary, compounded or reinforced by a persisting lack of understanding of the root causes and dynamics of violence against women, in particular among judges operating at the local level.[70] Moreover, not all judges seem to have an adequate understanding of the forms of violence against women covered by the Istanbul Convention, such as psychological violence, stalking, female genital mutilation (FGM), forced marriage, forced sterilisation and forced abortion. The same applies to the consent-based definition of rape introduced by the 2017 amendments to the Criminal Code and the paradigm shift this represents. GREVIO was alerted to the fact that judges often lack training on handling rape cases in a victim-centred and trauma-informed manner.[71] This is exacerbated by the fact that not all legal professionals working at the free legal aid centres are adequately trained in the field of violence against women.[72]

92. Last, GREVIO is not aware of any evaluation of the training programmes on violence against women.

68. Information obtained during the evaluation visit.
69. See in particular the European Court of Human Rights, *Ukraine and the Netherlands v. Russia*, and the reports of the Independent International Commission of Inquiry on Ukraine: www.ohchr.org/en/hr-bodies/hrc/iicihr-ukraine/index.
70. Information obtained during the evaluation visit. See also the submission by the Women's Perspectives centre, 2025.
71. Information obtained during the evaluation visit. See also Analytical Centre JurFem: report on the findings of the study on the training and advanced training programmes on criminal offences related to sexual violence for the legal community.
72. Information obtained during the evaluation visit. See also the submission by the Women's Perspectives centre and Article 57, Legal aid.

93. **GREVIO encourages the Ukrainian authorities to take additional steps to ensure that all professionals working with victims or perpetrators of all forms of violence covered by the Istanbul Convention, in particular the judiciary, receive systematic and mandatory initial and in-service training to identify and respond to all forms of violence covered by the Istanbul Convention. To this end, the Ukrainian authorities should, in particular:**

- **a. ensure that the training provided covers issues such as gender stereotypes; the difference between conflict and violence; the identification of victims; the rights and needs of victims; the prevention of secondary victimisation; victim-centred co-operation among all professionals; the content and objectives of perpetrator programmes; the impact of violence on children exposed to it; and violence against women exposed to intersectional discrimination;**
- **b. ensure that follow-up is provided to initial training, including that delivered by NGOs;**
- **c. evaluate the impact of training programmes on different professional groups.**

E. Preventive intervention and treatment programmes (Article 16)

1. Programmes for perpetrators of domestic violence

94. A model programme for perpetrators of domestic violence was drawn up by the Ministry of Social Policy in 2018 and updated in 2021.[73] The programme, which includes among other topics work on stereotypes and prejudices about gender roles, was devised to serve as a basis for local authorities and other bodies, including NGOs delivering perpetrator programmes. In 2023, another programme for perpetrators was made available under the auspices of the Ministry of Justice.[74] This programme was designed in the context of the introduction of probation in Ukraine. Perpetrators of domestic violence on probation can therefore be ordered by a court to participate in and complete this programme.

95. However, information brought to GREVIO's attention indicates that only a limited number of perpetrators are court-mandated to attend such programmes, including in the context of probation programmes, and that even fewer complete the programme. This seems to result from the lack of clear criteria available to judges regarding the eligibility of perpetrators to enrol in such programmes and from a lack of information exchange and co-ordination of all the relevant bodies in implementing court decisions on perpetrator programmes. In 2023, a total of 1 265 people were referred to such programmes and 848 completed them. This figure rose to 1 300 in 2024 and then fell to 1 254 in 2025, with a persistently low number of perpetrators completing the programme (225 in 2025).[75] Perpetrators may also participate on a voluntary basis but rarely do so. In addition to the above programmes, a programme for persons feeling uncontrolled outbursts of violence is being developed, which GREVIO notes with interest.

96. Moreover, GREVIO draws attention to several concerns regarding the work with perpetrators of domestic violence. First, the short duration of the existing programmes, which is 46 hours over a period of one to three months. This is not likely to result in lasting changes in the behaviour of perpetrators. Second, the need to update content in the light of existing promising international practices and to ensure that they address the root causes of perpetration and tackle sexist prejudices and stereotypes.[76] Third, the serious shortage of trained specialists to work with perpetrators due to the lack of standardised training courses based on clearly defined qualification requirements. Fourth,

73. Order No. 1434 of the Ministry of Social Policy of 1 October 2018.
74. Order of the Ministry of Justice No. 2362/5 on approval of probation programmes for minors and adults on "overcoming domestic violence". The programme for perpetrators on probation was updated in 2024.
75. Information provided by the Ukrainian authorities. See also JurFem shadow report, 2023, indicating that, in the Kyiv region, 588 perpetrators completed perpetrator programmes in 2018, 599 in 2020, 290 in 2021 and 83 in 2022.
76. See in particular "Guidance for safe and effective perpetrator programmes: Article 16 of the Istanbul Convention. A comparative study and recommendations on programmes for perpetrators of domestic and sexual violence", Council of Europe, 2024.

the lack of sustainable funding that impacts not only on the quality of the work with perpetrators carried out but also on the continuity and geographical roll-out of such programmes.[77] Consequently, not all regions of Ukraine are able to provide perpetrator programmes staffed with trained professionals.[78] The resulting difficulties for perpetrators living in rural areas to access programmes represents a particular challenge, which can lead to barriers to accessing programmes or to low completion rates.

97. In addition, perpetrator programmes are frequently delivered by social services, which also provide support services to victims of domestic violence.[79] Therefore, they are sometimes carried out in the same premises as victim support services. This situation may generate substantial risks for the safety of women victims of violence. GREVIO wishes to highlight the fact that the safety of victims should always be at the centre of any work with perpetrators. It is therefore essential to run the programmes with adequately trained specialists who fully understand the goals of perpetrator programmes and the need to ensure the safety of the victims. Perpetrator programmes should also implement risk assessment, which does not seem to be the case currently, and victims should be provided with adequate information on attendance by the perpetrator. To this end, procedures should be put in place to regulate communication and co-operation between perpetrator programmes and victim support services.[80]

98. Moreover, GREVIO stresses the importance of ensuring that common standards apply across the country regarding the objectives of perpetrator programmes, the methodology to be used, the length of courses, the management of risks for the safety of victims of violence and the evaluation. GREVIO notes with interest that the Ukrainian authorities have undertaken work to update guidance for perpetrator programmes and that they plan to develop a uniform training programme. In this context, it draws their attention to the recently published European standards for perpetrator programmes, which fully align with the Istanbul Convention's requirements and could serve as a reference when establishing national minimum standards for such programmes.[81]

99. Last, GREVIO notes with concern that the war of aggression by the Russian Federation has resulted in an increase in violence against women perpetrated by military personnel, in particular soldiers returning from the frontlines suffering from war-related trauma.[82] While acknowledging the complexity of the situation, GREVIO underlines the importance of providing an adapted and co-ordinated response, by developing targeted programmes for work with this specific sub-set of domestic violence perpetrators. Likely to face harmful consequences of the war in intersecting aspects of their health and personal relationships as drivers of violent behaviour, it would be important to deliver programmes that address the causes of perpetration in a tailored manner. Such programmes could take different forms, within existing perpetrator programmes or as part of the work of veteran centres or other institutions supporting them.

100. **GREVIO strongly encourages the Ukrainian authorities to:**

- **a. pursue efforts to increase the quality of perpetrator programmes by developing a common methodology and minimum standards for work with perpetrators, in line with the Istanbul Convention and on the basis of the European standards for perpetrator programmes. They should include a gender-sensitive approach, the deconstruction of gender stereotypes and address the responsibility of perpetrators for their behaviour;**

77. Information obtained during the evaluation visit.
78. Parliament Commissioner for Human Rights of Ukraine, Annual report 2024, p. 294. The report indicates the specialists have been trained to implement such programmes in 19 out of the 24 regions (*oblast*s).
79. Information obtained during the evaluation visit.
80. For more detailed information, see "Guidance for safe and effective perpetrator programmes: Article 16 of the Istanbul Convention", Council of Europe 2024; this publication is available in Ukrainian at: www.rm.coe.int/european-standards-for-perpetrator-programmes-ukr/1680b692ad.
81. www.work-with-perpetrators.eu/european-standards-for-perpetrator-programmes.
82. Information obtained during the evaluation visit. See also the submission by the Women's Perspectives centre, pp. 5, 36 and 37. See also Article 13, Awareness raising.

b. strengthen the capacity of perpetrator programmes and roll them out throughout the country;
c. take measures to increase the level of attendance and the rate of completion of perpetrator programmes;
d. take the necessary steps to ensure specific training of the professionals working in perpetrator programmes;
e. embed systematic risk-assessment procedures in work with perpetrators of domestic violence in order to ensure the safety of the victims and their children;
f. ensure systematic evaluation of the programmes' effectiveness and absence of adverse effects.

101. **Moreover, GREVIO urges the Ukrainian authorities to design and implement targeted programmes for perpetrators of domestic violence by military personnel and war veterans as part of a co-ordinated strategy for its prevention.**

2. Programmes for perpetrators of sexual violence

102. No specific programmes for perpetrators of sexual violence exist in Ukraine. GREVIO highlights the importance of introducing such programmes in order to prevent perpetrators of sexual violence from reoffending.

103. **GREVIO strongly encourages the Ukrainian authorities to take steps to comply with the requirements of Article 16, paragraph 2, of the Istanbul Convention concerning the establishment of treatment programmes for perpetrators of sexual violence, taking due account of best practices developed internationally and guaranteeing a human rights-based approach.**

F. Participation of the private sector and the media (Article 17)

104. Women are under-represented in the Ukrainian media, even more so since the beginning of the war of aggression, and studies demonstrate that gender stereotypes regarding the role of women and men continue to prevail in reporting.[83] Against this background, GREVIO welcomes the fact that, since 2021, amendments to existing laws have been passed to tackle the issue of discrimination in media reporting and advertising. The Law on Advertising was, in this respect, amended in order to impose sanctions for discrimination based on gender in advertising.[84] A prohibition on disseminating pornographic or discriminatory content that prejudices individuals or groups based on several grounds, including sex, was also introduced through the Law on Media. The National Council of Ukraine on Television and Radio Broadcasting is responsible for ensuring compliance with the law, including ensuring gender equality in the media sector and protecting citizens from discrimination.

105. GREVIO notes with satisfaction the regular publication by the Broadcasting Council of nationwide studies entitled "Gender Profile of Ukrainian Media", including – for the 2025 issue – a review of technology-facilitated gender-based violence against women journalists.[85] Such studies are prepared in close co-operation with civil society organisations.

106. While the Code of Ethics of Journalists does not contain any specific provision regarding gender-sensitive reporting, the Ministry of Culture and Information Policy issued in 2023 methodological guidance on media coverage of issues related to gender equality, sexist stereotypes and the prevention of violence against women. These recommendations provide detailed guidance on how to report on violence against women, including conflict-related sexual violence, in an ethical manner that respects the rights and dignity of victims and avoids sensationalism and secondary

83. See the National Council of Ukraine on Television and Radio Broadcasting, "Gender Profile of Ukrainian Media" (since 2023), accessible at: www.webportal.nrada.gov.ua/category/gendernyj-balans-u-media/.
84. Law No. 3427 on amendments to the Law of Ukraine on Advertising regarding combating gender-based discrimination.
85. www.webportal.nrada.gov.ua/category/gendernyj-balans-u-media/.

victimisation. GREVIO commends this development and underlines the important role that the media play in preventing violence against women and tackling sexist stereotypes and prejudices. In 2024, a standard policy for gender equality in media content was issued, under the auspices of the Ukrainian Commission on Journalism Ethics, providing guidelines on how to ensure gender equality within editorial teams and how to report on gender equality and violence against women.[86] Training of journalists on reporting on violence against women has also taken place.[87]

107. Despite all these efforts, GREVIO notes with concern information indicating a pattern of widespread online violence against women journalists.[88] The 2025 report "Gender Profile of Ukrainian Media" highlights that 81% of Ukrainian women journalists have encountered online attacks, while only 25% of media outlets have practices to respond to such violence.[89] It points to the need to encourage media organisations and journalists' unions to take concrete steps to eradicate gender-based discrimination, victim-blaming attitudes and violations of the privacy of victims of gender-based violence against women and their children in all their journalistic activities.[90] Instances of online violence against women journalists should also be duly investigated and prosecuted.[91]

108. With the war of aggression and the conscription of many men, women are increasingly taking an active role in traditionally male-dominated employment sectors, such as energy, mining or transportation, where they are exposed to high levels of harassment, including sexual harassment.[92] Moreover, GREVIO was alerted to the fact that many women have had to work in the informal sector, where protection against sexual harassment is non-existent. Therefore, it welcomes the fact that, in 2024, the law on ensuring equal rights and opportunities for women and men was amended to include a definition of sexual harassment. In the same year, the Code of Administrative Offences was amended to provide administrative liability for sexual harassment.[93] The new definition covers the workplace. It is therefore essential to ensure that it is effectively implemented, that accessible complaint mechanisms are available and that private-sector enterprises are made aware of the need to prevent sexual harassment at work and co-operate in this matter with professional organisations and trade unions.

109. Furthermore, GREVIO notes with interest the measures taken in the defence sector to allow the reporting of abuse, including sexual harassment, through specific helplines.[94]

110. **Bearing in mind the important role of the media in promoting equality between women and men and reducing the level of social acceptance of violence against women, GREVIO encourages the Ukrainian authorities to continue to promote the development of specific standards of self-regulation for a balanced, non-sexist and non-sensationalist coverage of violence against women.**

111. **GREVIO encourages the Ukrainian authorities to ensure that women victims of violence and harassment at work are adequately supported and to evaluate the implementation of the new legal framework by collecting data on the number of women victims of sexual harassment at work, the complaints filed by the victims and their outcome.**

86. OSCE, Commission on Journalism Ethics and Women in Media, Gender equality policy in media content, 2024.
87. Information obtained during the evaluation visit.
88. See Women in Media, "Her voice, their target: gendered online violence against Ukrainian Women Journalists", April 2025, with the support of UNESCO and Japan. The study shows that 81% of the 180 women journalists surveyed experienced at least one form of online violence. See also Women in Media, "Online violence against Ukrainian media workers: impacts gaps, requirements", August 2025.
89. www.wim.org.ua/en/materials/gender-profile-of-ukrainian-media-2025/.
90. See also GREVIO General Recommendation No. 1 on the digital dimension of violence against women, 2021.
91. See also Article 50, Immediate response, prevention and protection.
92. Information obtained during the evaluation visit.
93. See also Article 40, Sexual harassment.
94. Ibid.

IV. Protection and support

112. Chapter IV of the Istanbul Convention aims at a multifaceted, professional and victim-oriented support structure for any woman who has experienced any of the forms of violence covered by the convention.

A. General obligations (Article 18)

113. Article 18 of the Istanbul Convention sets out a number of general principles to be respected in the provision of both general and specialist protective and supportive services. One of these principles is the need for services to act in a concerted and co-ordinated manner with the involvement of all the agencies concerned, taking into account the relationship between victims, offenders, children and their wider social environment. Addressing the complexity of violence against women requires establishing an intervention system that involves all relevant policy sectors and administrative levels and bodies. Multisectoral and multi-agency interventions across the national, regional and local levels are key to ensuring an effective and cohesive response to all forms of violence. Effective co-ordination at local levels is particularly important in terms of ensuring that responses fit the community needs and provide “one-stop-shop” services to victims.

114. Following the adoption of the 2017 law on domestic violence, a procedure was adopted in 2018 to provide guidance on the interaction of entities involved in preventing and combating domestic violence and gender-based violence, including guiding principles on referring victims.[95] Protocols also exist for social workers to refer women victims of violence to specialist support services. Moreover, memorandums of understanding between state services and services provided by NGOs at the local level are often in place to ease their co-operation. GREVIO recognises the multitude of parties involved in service provision for victims in Ukraine, which include state authorities, national NGOs, international organisations and foreign donors, and the existing efforts to ensure co-ordination. However, it points to the importance of ensuring, on the one hand, the provision of support services on the basis of the principles and obligations laid out in the Istanbul Convention, and on the other hand, the provision of services within all parts of the country. In this respect, GREVIO highlights the need to map existing support services with a view to identifying possible gaps in terms of location and type of violence addressed.

115. While efforts are being made to ensure co-ordination at regional and municipal levels, notably by establishing co-ordinating councils on violence against women, some local authorities seem to lack the capacity to set these up. Moreover in practice, co-operation and information sharing between the relevant authorities are often lacking, resulting in an inadequate response to violence that can lead to repeated violence and in some cases, to gender-related killings of women.[96] Gaps in co-ordination can result from different factors, including a lack of human resources and of trained personnel and security issues in areas close to the frontlines. Moreover, referral protocols are not always in place in practice and it can sometimes be difficult for victims to obtain comprehensive information on where to find help. GREVIO notes with concern that such gaps in the co-ordination of support also affect the provision of services to victims of conflict-related sexual violence.[97] Effective co-operation between all relevant state sectors (including the defence and health sectors), specialist support services and women’s rights organisations is also necessary to respond to the growing problem of violence against women and domestic violence committed by men who are part of the heavily traumatised military personnel.[98]

95. Resolution of the Cabinet of Ministers of Ukraine on approval of the procedure for interaction between entities implementing measures in the field of prevention and counteraction to domestic violence and gender-based violence.
96. Information obtained during the evaluation visit. See also Parliament Commissioner for Human Rights, Annual report 2024 p. 290.
97. Ibid., p. 295. See also DCAF, Geneva Centre for Security Sector Governance, Security sector reform and conflict-related sexual violence, 2024.
98. See Article 12, General obligations, and Article 16, Preventive intervention and treatment programmes.

116. Article 18 of the convention foresees that the authorities shall provide consular and other protection and support to their nationals entitled to protection, including to women victims of violence abroad. A large number of women and children have left Ukraine since the beginning of the war of aggression. In some of its country evaluations regarding countries of destination for Ukrainian women and children, GREVIO found that they are highly vulnerable to different forms of violence and exploitation as a result of their displacement.[99] Against this background, it notes with interest that in 2023 a draft law aimed at strengthening the national response mechanism to domestic violence and gender-based violence against Ukrainian citizens abroad was prepared with the aim of assigning foreign diplomatic and consular missions of Ukraine with competences in the field of protection from domestic violence.[100] Moreover, since 2023, Ukrainian women living abroad can contact the government helpline 1543 in the event that they become victims of domestic or gender-based violence; the helpline consequently forwards the information to the relevant services in the Ministry of Foreign Affairs.

117. **GREVIO strongly encourages the Ukrainian authorities to take measures to step up the co-ordination of responses and enhance networking among existing resources to cater more efficiently to the needs of women victims of all forms of violence covered by the Istanbul Convention, including by ensuring more effective use is made of referral protocols and by mapping existing services at the local level.**

B. Information (Article 19)

118. GREVIO notes with concern the persistence of an overall lack of information for women victims of violence on their rights and on existing remedies, including on access to free legal aid.[101] In this context, it welcomes the measures taken by the Office of the Parliament Commissioner for Human Rights (referred to as "the ombudsman") to disseminate information about the rights of victims of domestic violence, in particular through its regional offices.[102] Despite these welcome efforts, GREVIO considers that more measures are needed from the authorities to disseminate in a systematic manner accessible information about existing remedies and services to all women victims of violence, including those belonging to national minorities, women with disabilities and those living in rural areas and close to frontline areas.[103] In view of the multiplicity of services available at different territorial levels, the accessibility of information implies that information be provided in a somewhat centralised manner so that women do not have to go from one service to another to receive appropriate information and support. It is also essential to disseminate information on available protection and support for all forms of violence against women beyond domestic violence, including information on remedies in cases of sexual violence.

119. **GREVIO strongly encourages the Ukrainian authorities to disseminate comprehensive and easily accessible information about existing support services, specialist and general, that are available to women victims of violence across Ukraine.**

C. General support services (Article 20)

1. Social services

120. Women victims of violence may apply to social services centres for families, children and youth in order to obtain information and psychological and social support. They may also be referred

99. See for instance GREVIO baseline evaluation on Luxembourg, 2023, paragraph 23; GREVIO baseline evaluation report on Greece, 2023, paragraph 348; and GREVIO baseline evaluation on the United Kingdom, 2025, paragraph 196. See also Article 4, Fundamental rights, equality and non-discrimination.
100. The law is yet to be passed.
101. See Article 57, Legal aid.
102. See also the manual prepared by the ombudsman's office on preventing and combating domestic violence ("Violence hides in silence. Don't stay silent!") containing guidance for local authorities on identifying this form of violence and referring them to existing support services.
103. See Voice of Romni, 2024.

to a domestic violence shelter or a crisis room (emergency crisis accommodation for up to 10 days). However, these centres, which operate under the auspices of local authorities, are often underfunded and under-resourced. Moreover, the level and quality of services provided varies greatly between different regions of the country.[104]

121. Since 2023, Resilience Centres have been set up by the Ministry of Social Policy, Family and the Unity of Ukraine in more than 300 communities. Their aim is to provide social and psychological support to people affected by the war, including to women victims of violence. As a flagship initiative of the First Lady of Ukraine, these centres provide much needed support across many aspects of war-affected civilian life, in particular mental health. Recognising the importance of such new offers of support, GREVIO draws attention to the need to ensure that, in as far as their offer includes support for women victims of domestic violence, rape or any other type of violence against women covered by the Istanbul Convention, this support be provided by specially trained staff.

2. Healthcare services

122. The war of aggression by the Russian Federation has generated enormous challenges for the Ukrainian health system: the destruction of many hospitals and other healthcare facilities, coupled with a shortage of professionals, is hindering the access of many people to healthcare. Additionally, the war has substantially increased the need for mental health support, particularly among those displaced or liberated from Russian occupation, while at the same time the country faces a shortage of psychologists and other medical professionals in the field of mental health.[105] Against this background, a number of general practitioners have been trained to detect signs of mental health issues among their regular patients. Moreover, several NGOs provide comprehensive humanitarian and psychological support to women exposed to or confronted with gender-based violence, including through mobile teams that make it possible to reach out to people displaced by the war, and initiatives such as the SafeWomenHUB platform.[106] The Aurora platform, set up with support of the UNFPA, provides remote, specialised psychotherapeutic support to people who have experienced war-related violence, including sexual violence.[107] It also serves the needs of Ukrainians abroad and of people living in territories of Ukraine temporarily occupied by the Russian Federation. GREVIO commends the work of these professionals who, despite the very difficult circumstances, continue to provide assistance and support to women victims of violence, sometimes at risk to their lives.

123. Despite the above constraints, GREVIO notes with satisfaction that the authorities have taken measures to improve the access of women victims of violence to adequate healthcare. In 2019, a care path for women victims of violence was created, which also includes some guidance on referrals to specialist support services (such as free legal aid services).[108] This document provides guidance to healthcare professionals on the steps to be taken and includes an obligation to report cases of violence to the police.[109] Moreover, since 2017, all urgent services for victims of sexual violence are provided free of charge by hospitals, including the detection of sexually transmitted diseases and the provision of emergency and longer-term contraception. In this context, a number of specific service delivery points for victims of violence against women have been set up in hospitals to provide, on a confidential basis, information on sexual and reproductive health and rights, emergency care and other treatment and referral to other services.[110] A system of assistance and support in relation to sexual and reproductive health concerns was also set up by the UNFPA,

104. Information obtained during the evaluation visit.
105. See UN Human Rights Council, Report of the Independent International Commission of Inquiry on Ukraine, 19 March 2025.
106. www.healthright.org/news/article/safewomenhub-platform-created-to-provide-emergency-care-to-girls-and-mothers-in-ukraine/.
107. www.ukraine.unfpa.org/en/topics/gbv-response-and-prevention-programme.
108. Order No. 278 of the Ministry of Health of 1 February 2019 on a Procedure for Conducting and Documenting the Results of Medical Examinations of Victims of Domestic Violence / Potential Victims and Providing Them with Medical Care.
109. See also Article 28, Reporting by professionals.
110. The setting up the service delivery points was supported by the UNFPA.

comprising a national helpline and mobile teams.[111] Additionally, about 1 000 emergency doctors and nurses have been trained to respond to victims of sexual violence.[112] In particular, substantial training was provided to healthcare professionals to address the needs of victims of conflict-related sexual violence with a victim-centred and trauma-informed approach.

124. Despite these developments, information brought to GREVIO's attention indicates that there is a persisting lack of detailed and specific protocols for healthcare providers on the detection, care and support and referral of cases of violence against women. In this respect, GREVIO notes with concern that women victims of rape may be compelled to undergo unnecessary gynaecological examinations in the forensic assessment of the rape.[113] Clearer guidance and training on the steps healthcare professionals should take when dealing with victims of rape could contribute to overcoming such concerns, and more generally, to better integrating gender-based violence against women as a key concern for healthcare professionals. Moreover, up-to-date guidance, aligned with the International Protocol on the Documentation and Investigation of Sexual Violence in Conflict, should also be provided to healthcare professionals regarding victims of conflict-related sexual violence.[114] Last, it appears that healthcare professionals are not always involved in mechanisms set up at the local level to provide co-ordinated support to women victims of violence. GREVIO underlines that these professionals are often the first to come into contact with a woman victim of violence and that it is therefore essential that they are fully integrated into such co-operation mechanisms.[115]

125. At the same time, GREVIO notes with concern that while the need for forensic expertise has significantly increased with the war, there is a severe shortage of such experts, with a total number of 697 for the entire country, even though new forensic doctors were appointed in 2024.[116] This situation results in forensic examinations in cases of rape being delayed or unavailable. Access to forensic psychological expertise appears to be particularly challenging.[117] Evidence in cases of sexual violence can be stored for a period of up to 20 years, if ordered by a court, or as long as it is needed for the investigation. GREVIO notes with interest the plans to improve the documentation of bodily injuries in hospitals to speed up and ease the work of forensic specialists. A project aimed at training forensic nurses is also underway. GREVIO welcomes these developments and highlights that the availability of adequately trained forensic nurses can both mitigate the lack of forensic doctors and contribute to the work of the multidisciplinary mobile teams.[118]

126. **While welcoming the measures taken to improve the response of the healthcare system to women victims of violence, GREVIO strongly encourages the Ukrainian authorities to take further measures to ensure the availability of clear and updated protocols on the detection, care and referral of women victims of all forms of violence.**

127. **Furthermore, GREVIO encourages the Ukrainian authorities to increase the ability of the healthcare sector to ensure forensic documentation in relation to the different forms of violence against women covered by the Istanbul Convention.**

D. Specialist support services (Article 22)

128. The aim of specialist support is to ensure the complex task of empowering victims through optimal support and assistance catered to their specific needs. Much of this is best ensured by

111. www.ukraine.unfpa.org/en/topics/sexual-and-reproductive-health.
112. In co-operation with the World Health Organization and Health International.
113. Information obtained during the evaluation visit. See also the shadow report on sexual violence and stigmatisation of victims, EHRAC, Women's initiatives for gender justice, La Strada Ukraine, ULAG and Equality Now, 2024.
114. See International Protocol on the Documentation and Investigation of Sexual Violence in Conflict, Best practice on the documentation of sexual violence as a crime or violation of international law, second edition, March 2017.
115. See also Article 18, General obligations.
116. Information provided by the Ukrainian authorities. Forensic specialists are required to cater for the needs of returning prisoners of war and victims of conflict-related sexual violence, among other things.
117. Information obtained during the evaluation visit.
118. See Article 22, Specialist support services.

women's organisations and by support services provided, for example, by local authorities with specialist and experienced staff with in-depth knowledge of gender-based violence against women. It is important to ensure that these services are sufficiently spread throughout the country and are accessible to all victims. Moreover, these services and their staff need to be able to address the different types of violence covered by the scope of the Istanbul Convention and to provide support to all groups of victims, including hard-to-reach groups.

129. As of May 2025, the Ukrainian network of specialist services, which was reinforced in 2022, comprised 59 shelters and 108 crisis rooms (short-term emergency accommodation) across the country for victims of domestic violence. In addition to these services, there were 29 helplines, 120 legal aid services and 109 services providing psychological support. Moreover, GREVIO welcomes the fact that around 700 mobile teams provide social and psychological support directly to women victims of domestic violence across the country. All these services are provided by the authorities and by NGOs.[119] Services provided by the authorities are funded through allocations from the state budget to the local authorities responsible for setting up specialist services. While welcoming the availability of a range of specialist support services for women victims of violence, GREVIO notes that women may face serious obstacles to accessing such services due to the martial law in effect and the safety concerns related to the war of aggression. Another issue of concern brought to GREVIO's attention is the residence requirement for anyone wishing to access services provided at the local level. Many IDPs, however, refrain from registering at their new place of residence, or may not settle sufficiently long. Administrative hurdles and the fear of being stigmatised appears to be among the reasons for not registering, and a number of IDP women victims of violence are subsequently unable to access specialist support services.[120]

130. Moreover, several challenges in the operation of these services seem to exist. These include the lack of well-trained professionals and, at the same time, the increasingly complex needs of those turning to the network of specialist services. The complexity arises from war-related disability, IDP status, experiences as prisoners of war or conflict-related sexual violence, among other aspects.[121] Additionally, there is a lack of sustainable funding for specialist support services and the distribution of services across the country is uneven.[122] Rural areas lack accessible specialist support services and the situation is even more challenging in areas close to the frontlines. Resources available to the network of specialist services are sometimes reallocated by local authorities to other priorities, including humanitarian needs.[123] In this context, GREVIO welcomes the work of the multidisciplinary mobile teams that can reach out to women in need of support in such areas, while also providing basic humanitarian support and, in some cases, supporting evacuations. It notes, however, that these mobile teams are often underfunded,[124] cannot provide psychological support, operate only during working hours and sometimes lack the basic conditions to be able to function, such as petrol for the cars.[125]

131. Essential specialist services, including support through mobile teams, are also provided by NGOs.[126] Moreover, 12 survivor relief centres have been set up with the support of the UNFPA to provide comprehensive assistance to victims of war, including victims of conflict-related sexual violence. GREVIO notes that some of the projects currently implemented in the context of the war could serve as a source of experience to further strengthen the network of specialist services.[127] Therefore, it considers it important that, beyond the situation of emergency caused by the ongoing war, such projects are evaluated, the expertise acquired is retained and, as appropriate, they are integrated within the network of state support services.

119. Information provided by the Ukrainian authorities.
120. Information obtained during the evaluation visit.
121. See also Article 15, Training of professionals.
122. See Article 8, Financial resources.
123. Information obtained during the evaluation visit. See also Article 7, Comprehensive and co-ordinated policies.
124. Even though some of them benefit from support from international donors.
125. Information obtained during the evaluation visit.
126. See Article 20, General support services.
127. See also Article 25, Support for victims of sexual violence.

132. **While commending the measures taken to enhance the availability of specialist support services, GREVIO strongly encourages the Ukrainian authorities to:**

- **a. safeguard access to specialist support services by investing in an adequate geographical distribution and ensuring their long-term sustainability;**
- **b. evaluate and integrate promising practices and pilot projects into the state-funded network of specialist services.**

E. Shelters (Article 23)

133. Through the network of shelters, around 1 000 beds are available for women victims of violence and their children.[128] Shelters are usually run by municipalities. Women can in principle stay in shelters for a period of up to three months, renewable once. Crisis rooms are available as emergency accommodation for up to 10 days, after which victims may move to a shelter. Access to shelters and crisis rooms is free of charge.[129]

134. Individual plans are prepared for women staying in shelters, including psychological support, legal assistance, support to children and assistance in finding employment and reaching out to social services. While shelters may be accessed without filing a complaint, the police are usually notified of any woman accommodated in a shelter. Self-referrals are possible, although many are referred after having called the national police helpline 102. Victims of conflict-related sexual violence often turn directly to shelters for advice and support.[130]

135. GREVIO notes with concern that the number of shelters (59) appears to be very low for a country the size of Ukraine and in view of the number of registered complaints for domestic violence (151 716 in 2024). According to information brought to GREVIO's attention by women's rights organisations, 345 family places are currently available in Ukrainian shelters, which is far from meeting the standard of one family place per 10 000 inhabitants provided for by the Explanatory Report to the Istanbul Convention.[131] Furthermore, many shelters are not operating at full capacity, and occupancy rates are as low as 38%.[132] Professionals working with women victims of violence have drawn GREVIO's attention to the reasons why women do not seek protection in shelters.[133] These include a lack of information among women victims of violence about existing shelters, the location of many shelters in urban areas that are difficult to reach for rural women, complex administrative requirements to gain access to shelters, the derelict state of some of them and lack of funds to maintain them, safety concerns caused by the fact that not all shelters have adequate bomb shelters or the fact that many shelters are not accessible for women with disabilities.

136. In addition, in some regions domestic violence shelters have been re-purposed to house IDPs.[134] Other regions do not have domestic violence shelters at all.[135] In this context, GREVIO notes with interest the existence of a project seeking to pool specialist support, including shelters, between several municipalities through a co-funding scheme.[136] This is a welcome development, which could contribute to increasing women victims' access to dedicated domestic violence shelters and to maximising the use of existing resources.

128. No information was provided to GREVIO on the number of available family places.
129. The operation of shelters is regulated by the Standard Regulations on Shelters for Victims of Domestic Violence and/or Gender-Based Violence, approved by Resolution No. 655 of the Cabinet of Ministers of Ukraine of 22 August 2018.
130. Information obtained during the evaluation visit.
131. Explanatory Report to the Istanbul Convention, paragraph 135. See the submission by the Women's Perspectives centre.
132. See the submission by the Women's Perspectives centre, which indicates that in 2024 the occupancy rate was 38% for the entire country.
133. Information obtained during the evaluation visit.
134. Information obtained during the evaluation visit. This was in particular the case in western and central Ukraine after the beginning of the war of aggression by Russia. See also the submission by the Women's Perspectives centre, p. 31.
135. Luhansk, Ternopil, Chernihiv.
136. This project is supported by the UNFPA as part of the project Cities and Communities Free from Domestic Violence, carried out in 53 communities.

137. **GREVIO strongly encourages the Ukrainian authorities to identify and address, as far as possible, the factors hindering women's access to shelters and to remove any unnecessary access requirements.**

138. **GREVIO encourages the Ukrainian authorities to take further measures to ensure the availability of a sufficient number of shelter places for women victims of violence and their children. In doing so, they should in particular:**

- **a. ensure an even geographical distribution of shelters across the country;**
- **b. implement funding schemes that make it possible to pool resources, based on existing positive practices.**

F. Telephone helplines (Article 24)

139. A government helpline for combating human trafficking and for preventing and combating domestic and gender-based violence and violence against children has been operating since 2020, on a 24/7 basis.[137] Access is free of charge and services are provided on a confidential basis. The helpline provides psychological, social and legal advice to victims of violence against women in Ukrainian and, as needed, in Russian. Messages in other languages can be sent through the online platform. It has received around 220 000 calls and messages since 2020. Since 2023, the helpline has also been accessible from abroad to Ukrainian women living in other countries. While 90% of the calls relate to domestic violence, victims of rape also call the line, including for conflict-related sexual violence (1-2% of all calls). It also provides information and advice aimed at ensuring the safety of children. GREVIO notes that this helpline operates mostly as a referral system to other specialist support services and is hence in line with the requirements of the Istanbul Convention.

140. Another well-established national helpline, operating since 1997, is run by the women's rights organisation La Strada Ukraine. It received almost 24 000 calls in the first six months of 2025, on domestic violence, gender-based discrimination and trafficking in human beings, but also heard concerns brought by IDPs and soldiers and their families. It is also open to calls from Ukrainian women living abroad, as well as women living in territories of Ukraine temporarily occupied by the Russian Federation. The staff of La Strada helpline have also been providing specialised training to other helplines, including the government-run line. Several other helplines exist at regional level, run either by public authorities (for example the Kyiv City helpline, which is part of the Kyiv network of specialist services) and by NGOs.[138] The Ukrainian police also operate a helpline for victims (102), which receives some calls from women victims of violence and often refers them to specialist services.[139]

141. According to the information provided by the authorities and women's rights NGOs, the multiple helplines have a well-established referral practice, based on the needs of victims and their geographical location, minimising the risk of overlap or confusion for service users. GREVIO notes that this system of co-operation and referrals appears to function effectively. Nonetheless, it notes with concern that despite the high degree of co-operation between different helplines, women victims of violence may face difficulties in finding information, from a centralised source, on the helplines available to them.[140]

G. Support for victims of sexual violence (Article 25)

142. There are currently no rape crisis or sexual violence referral centres in Ukraine. Women victims of rape and sexual violence may seek support from the police, hospitals or existing specialist support services for women victims of violence. Nonetheless, GREVIO notes with interest the

137. The 1547 helpline.
138. The SafeWomenHub helpline and the Odessa region helpline run by the 10th of April organisation, for example.
139. See also Article 50, Immediate response, prevention and protection.
140. See the submission by the Analytical Centre JurFem, 2023. See also Article 19, Information.

existence of several practices and services that could constitute a solid basis for the setting up of such specialist services for victims of sexual violence. For example, victims of rape can turn to the crisis rooms for women victims of violence for emergency accommodation and support, to the helpline specifically devoted to sexual and reproductive health issues for advice and information, and to the relief centres for war victims and the Aurora platform for immediate psychological support. The growing number of healthcare professionals being trained to deal with conflict-related sexual violence can also contribute to easing the collection of forensic evidence. In addition, a legal basis entitling victims of conflict-related sexual violence to care and support has already been introduced.[141]

143. GREVIO wishes to underline that women victims of sexual violence need comprehensive trauma-informed and victim-centred care and support, including short- and long-term psychological support and legal assistance. Support for victims of sexual violence may take different forms. Rape crisis centres usually provide long-term psychological help, contact with other specialist services and support during court proceedings. Sexual violence referral centres provide more immediate medical care, forensic examinations, immediate intervention, trauma support and referrals to other services. Specialised training of the staff working in such facilities is particularly important. Rape crisis centres or referral centres should be in sufficient numbers (one per 200 000 inhabitants)[142] and easily accessible, including to women exposed to intersectional discrimination, such as women with disabilities, Roma women, migrant women, women who are IDPs, LBTI women or women with addictions. Moreover, GREVIO stresses that such services should come in addition to, not as a replacement for, general healthcare services and other specialist support services.[143] GREVIO notes that a more appropriate response to the short-term, but also long-term, needs of victims of all forms of sexual violence could be developed following the approaches and the example of responding to the needs of victims of conflict-related sexual violence.

144. **GREVIO strongly encourages the Ukrainian authorities to:**

- **a. set up specialist support services for women victims of sexual violence, making use of existing useful practices and experience at national level and drawing inspiration from positive practices at international level;**
- **b. ensure that such services provide immediate medical care, victim-sensitive forensic examinations and short-term and long-term trauma-informed psychological assistance by qualified professionals, in line with the standards set by the Istanbul Convention;**
- **c. ensure that a victim's access to such support services is not conditional on her willingness to lodge a complaint.**

H. Protection and support for child witnesses (Article 26)

145. The obligation set out in this article is to ensure that whenever children have witnessed domestic violence, rape, sexual harassment or other forms of violence covered by the convention, the services provided to direct victims should also cater for the needs and rights of any children exposed to such violence. While this is most relevant to domestic violence cases, it is important to bear in mind that children may also be exposed to other forms of violence.

146. Research has shown that children who witness one of the parents assaulting the other one in the home are at risk of showing development disorders, somatic and emotional problems, cognitive functioning disorders and internalisation of patterns of violence that need to be addressed in the long term.[144] It is thus of crucial importance to ensure their access to psychological counselling and therapy as soon as they come to the attention of the authorities.

141. Law No. 4067-IX of 20 November 2024.
142. Explanatory Report to the Istanbul Convention, paragraph 142.
143. See Mid-term horizontal review of GREVIO baseline evaluation reports, 2022, pp. 84-87.
144. "Problems associated with children's witnessing of domestic violence", Jeffrey L. Edleson, VAW Net, available at www.vawnet.org/material/problems-associated-childrens-witnessing-domestic-violence

147. The 2017 law on domestic violence recognises children who witness domestic violence as victims, with all the rights conferred by the status of victim of domestic violence, including the right to free legal aid.[145] Despite this legal recognition, experts in the field have drawn GREVIO's attention to the fact that, in practice, children exposed to domestic violence are often not acknowledged and protected as such.[146] Police records frequently omit to mention the presence of children in situations of domestic violence and, when they are mentioned in police reports, courts do not always grant them the status of victims. Moreover, while the referral of children exposed to domestic violence to appropriate support services should be systematic, it appears that this is not always ensured in the context of police interventions in cases of domestic violence.[147] GREVIO highlights that protocols and questionnaires could be made available to police officers intervening in cases of domestic violence in order to ensure that they systematically enquire about the presence of children.

148. Additionally, age-appropriate psychological examinations and support are rarely available to children exposed to domestic violence, although shelters often provide psychological support to children as well as to their mothers.[148] Against this background, GREVIO welcomes the amendments made in 2024 to the Code of Administrative Offences requiring the recognition of children exposed to domestic violence as victims, regardless of whether harm was caused to them. Importantly, the amendments introduce administrative liability of public servants for failure to report domestic violence against a child. GREVIO highlights the importance of ensuring that these legal provisions translate into practice and that children exposed to violence against women are granted, in practice, access to effective protection and support.

149. **GREVIO urges the Ukrainian authorities to ensure that children exposed to domestic violence are systematically recognised by the authorities and all relevant professionals as victims and afforded the protection and rights they are entitled to by law.**

150. **Moreover, GREVIO strongly encourages the Ukrainian authorities to take measures to improve the access of children exposed to domestic violence to adequate counselling and psychological support.**

I. Reporting by professionals (Article 28)

151. Under Ukrainian law, professionals are required to inform the police if there are grounds to believe that a crime has been committed. Situations of domestic violence must be reported to law-enforcement officers within 24 hours when the victim is a person with a disability or a child.

152. The 2019 reporting procedure for healthcare professionals imposes a specific obligation to report cases of domestic violence, which includes violence against an adult intimate partner.[149] According to the authorities, plans are underway to amend the existing legislation as the reporting obligation may deter women victims of violence from seeking medical support as it equates seeking help with reporting. While noting that several forms of violence against women, including domestic violence and rape, without aggravating circumstances are not investigated *ex officio* and require a statement by the victim, GREVIO stresses that extensive reporting obligations may raise issues around the provision of victim-centred and gender-sensitive services that respect women's autonomy.[150] Such reporting obligations may also jeopardise the doctor–patient relationship, of which confidentiality is a fundamental element.

145. The Supreme Court, in a decision of 2021, confirmed that children witnessing domestic violence should be considered as victims of such violence; see Judgment No. 753/19409/19 of 17 February 2021.
146. Information obtained during the evaluation visit. See also the submissions by JurFem and by the Women's Perspectives centre.
147. Information obtained during the evaluation visit.
148. A pilot project aiming to involve specially trained psychologists in criminal proceedings involving children through the regional centres for free secondary legal aid is also under way since 2023.
149. Order 278 of the Ministry of Health of 1 February 2019.
150. See Article 55, *Ex parte* and *ex officio* proceedings.

153. The obligation entailed by Article 28 of the convention is thus carefully worded in order to allow healthcare staff, where they have reasonable grounds to believe that a serious act of violence has been committed and that further serious acts of such violence are to be expected against an adult, to report their suspicion to the competent authorities without risking being sanctioned for breaching their professional duty of confidentiality. In cases where there are no reasonable grounds to believe that further serious acts of violence are likely to be committed, however, the personal autonomy and choice of the woman concerned should be respected. The Explanatory Report to the Istanbul Convention explicitly states that this provision does not impose an obligation on such professionals to report.[151] The exception would be cases such as where the victim is a minor or is unable to protect her or himself because of physical or mental disabilities.

154. **GREVIO encourages the Ukrainian authorities to ensure that the duty to report imposed on professionals is tempered by full and sensitive information being provided to the victim to allow her to make an informed decision herself and maintain autonomy, while also ensuring the safety of all, especially children.**

151. Explanatory Report to the Istanbul Convention, paragraph 147.

V. Substantive law

155. Chapter V of the Istanbul Convention covers a range of provisions related to substantive law, in the area of both civil and criminal law. Their aim is to help create, in all parties to the convention, the necessary legislative framework to prevent violence against women, protect them from further victimisation and to ensure robust intervention and prosecution by law-enforcement agencies. In the interest of prioritisation, this section of the report addresses several but not all provisions of Chapter V of the convention.

A. Civil law

1. Civil remedies against the state – ensuring due diligence (Article 29)

156. A core aim of the convention is to end impunity for acts of violence against women. This not only requires that individual perpetrators be held accountable through criminal law and other measures but also that legal avenues be available to challenge and address any failure of state actors to comply with their due diligence obligation to prevent, investigate and punish acts of violence (Article 5, paragraph 2, of the convention).

157. The 2017 law on domestic violence foresees the liability of public officials for failure to comply with the requirements of the law.[152] Victims and perpetrators can appeal against decisions, actions and omissions of the authorities and apply, in court or through an administrative procedure, for compensation for harm caused by a state authority, the authority of the Autonomous Republic of Crimea or a local self-government body, by an official or employee of these authorities or by a body conducting operational and investigative activities and pretrial investigation, the prosecutor's office or a court.[153] In the absence of data on women seeking redress for negligent behaviour of the authorities, it is difficult for GREVIO to assess the efficiency of existing civil remedies. Nevertheless, information brought to its attention indicates that such remedies are not often used by women victims of violence and that the amounts granted as compensation are small.[154]

158. GREVIO welcomes the crucial role played by the ombudsman in Ukraine in terms of receiving citizens' complaints for violations of their rights, including at the hands of representatives of the authorities. It notes that in 2024 the ombudsman's office received 265 complaints about cases of domestic violence and 95 for other cases of gender-based violence, compared to 135 and 36 respectively in 2023.[155] The ombudsman can make recommendations to the authorities, including local authorities, where there are gaps in co-operation concerning the provision of support and protection to victims of violence. In several cases related to violence against women, its interventions led to internal investigations into police behaviour and the opening of investigations into cases of alleged gender-related killings of women.

159. **GREVIO encourages the Ukrainian authorities to ensure that existing legal remedies against state authorities for failures to prevent or respond to violence against women are accessible and effective in practice, including through improved information and monitoring of their use and outcomes. Progress in this area should be measured by collecting data on the number of civil lawsuits initiated, their outcomes and the damages awarded to victims.**

2. Compensation (Article 30)

160. According to the 2017 law on domestic violence, victims of domestic violence have the right to receive compensation for harm or financial losses, including for expenses related to their

152. Article 31.
153. Articles 1173, 1174 and 1176, part 6 of the Civil Code.
154. See the Decision of the Sosnovsky District Court of Cherkasy of 23 July 2024, Case No. 712/3308/23.
155. Information obtained during the evaluation visit.

treatment, counselling and cost of living, such as rent after separating from their abuser, and "recurring expenses for their everyday life, support for children or other family members who are (were) dependent on the perpetrator".[156] Compensation for material and moral harm can be sought under Articles 1 166 and 1 167 of the Civil Code as part of criminal proceedings or through separate civil proceedings. In the latter case, victims will be required to pay court fees.[157] Court fees are waived when claims are filed as part of criminal proceedings and if the offence resulted in serious injury to the health of the victim or in their mutilation.

161. In general, not many women victims of violence seem to seek compensation for experiences of gender-based violence. In 2024, out of 1 037 people that were recognised as victims of domestic violence under Article 126 of the Criminal Code of Ukraine, only 101 were granted material and moral damages.[158] No information is available on the number of women victims of domestic violence who were granted damages. This seems to be linked to the rather limited use by women victims of violence of the system of free legal aid as it is difficult to claim compensation without the help of a lawyer. Additionally, proceedings to obtain compensation can be lengthy and it appears that civil judges are at times reluctant to grant compensation to victims of violence against women.[159] Moreover, no specific procedure is available to victims for claiming the costs of treatment, counselling or accommodation rental, as foreseen in Article 26, paragraph 9, of the law on domestic violence.

162. As regards compensation paid by the state, GREVIO notes that Ukraine entered a reservation with regard to Article 30, paragraph 2, of the Istanbul Convention. It also notes that while Article 127 of the Criminal Procedure Code of Ukraine and Article 1 177 of the Civil Code of Ukraine provide that "harm caused to the victim as a result of a criminal offence shall be compensated to him/her at the expense of the state budget of Ukraine in the cases and in the manner provided for by law", no implementing law has yet been adopted. As a result, victims of violent crimes, which includes victims of domestic violence, rape and sexual violence, cannot seek compensation from the state, except in cases of conflict-related sexual violence.

163. GREVIO welcomes the willingness of the Ukrainian authorities to ensure accountability for conflict-related sexual violence and to provide the many victims of this widespread form of violence with redress and reparations.[160] In 2024, a law on the legal and social protection of survivors of sexual violence related to the armed aggression of the Russian Federation against Ukraine, and the provision of urgent interim reparations to them was adopted.[161] It grants victims of conflict-related sexual violence the right to receive immediate interim reparations, including cash payments, and the right to receive information on their rights and existing remedies. GREVIO welcomes the fact that the authorities set up in 2024, before adopting the above-mentioned law, a pilot project on urgent interim reparations for survivors of sexual violence related to the armed aggression of the Russian Federation against Ukraine. This project forms part of the Action Plan for the Framework Programme of Co-operation between the Government of Ukraine and the United Nations Organization on the Prevention and Counteraction of Conflict-related Sexual Violence, whose implementation is supported by the Interagency Working Group on Countering Sexual Violence Related to Russia's Armed Aggression against Ukraine and Assistance to Victims (IAWG).[162] As of May 2025, 878 applications for reparation had been received and 609 persons had been granted compensation (out of which 236 were women).[163] Victims of conflict-related sexual violence can be recognised as

156. Article 26, paragraph 9, of the Law on Preventing and Combating Domestic Violence.
157. Between €27 and €339.
158. State Judicial Administration of Ukraine, Court statistics for 2024.
159. See for instance the decision of the Obolonskyi District Court of Kyiv of 6 March 2025 in Case No. 756/1827/24.
160. See the European Court of Human Rights, Ukraine and the Netherlands v. the Russian Federation, Applications Nos. 8019/16, 43800/14, 28525/20 and 11055/22, Grand Chamber Judgment of 9 July 2025, paragraph 1078.
161. Law No. 4067-IX of 20 November 2024.
162. The project, launched under the auspices of the Office of the deputy Prime Minister, the Government Commissioner for Gender Policy and the Global Survivor Fund, is implemented by the Global Survivor Fund.
163. Interagency Working Group on Countering Sexual Violence Related to Russia's Armed Aggression against Ukraine and Assistance to Victims, Report on the outcomes of the realization of the Plan for the implementation of the Framework of Cooperation between the Government of Ukraine and the United Nations on the Prevention and Counteraction of Conflict-related Sexual Violence for the period from 1 January 2024 to 31 December 2024.

such based on their testimony, even though they have not initiated legal proceedings. This pilot project should serve as a basis for establishing a sustainable, nationwide mechanism for compensation, as foreseen by the law on the legal and social protection of survivors of sexual violence related to the armed aggression of the Russian Federation against Ukraine, and the provision of urgent interim reparations to them. However, the lack of sustainable funding for this pilot scheme is of concern.

164. In 2023, the Register of Damage Caused by the Aggression of the Russian Federation against Ukraine (known as the Register of Damage for Ukraine) was set up under an Enlarged Partial Agreement of the Council of Europe, comprising 45 participants and associate members.[164] It functions as a record of all eligible claims seeking compensation for the damage, loss and injury inflicted by the aggression of the Russian Federation in and against Ukraine. Since March 2025, victims of conflict-related sexual violence are also eligible to submit their claims. Eligible claims are recorded in the register for further examination and evaluation by the International Compensation Commission for Ukraine, formally set up and opened for signatures on 15 December 2025.[165] It will assess all compensation claims filed by individuals, legal entities, and the State of Ukraine. Following an agreement in 2025 between the Register of Damage and the Ukrainian authorities, individuals wishing to submit a claim to the register will be able to benefit from the free legal aid system as well as use evidence collected by Ukrainian law-enforcement authorities to support their claim. GREVIO welcomes these developments and underlines the importance for victims of conflict-related sexual violence to be able to rely on assistance and support in the process of claiming reparations. Similarly, it is essential that all victims are informed of the possibilities to claim compensation. In this context, GREVIO commends the work of the ombudsman's office, which provides support to victims of conflict-related sexual violence in submitting claims for compensation.

165. **GREVIO encourages the Ukrainian authorities to take further measures to ensure that victims of all forms of violence covered by the Istanbul Convention, including conflict-related sexual violence, are systematically informed of their right to claim compensation and of the procedures to be followed and that they are provided with adequate support to do so.**

3. Custody, visitation rights and safety (Article 31)

166. Custody and visitation decisions in relation to families with a history of abuse require a careful balancing of the different interests at stake. Article 31 of the Istanbul Convention seeks to ensure that incidents of violence covered by the convention, in particular domestic violence, are taken into account in decisions on custody and visitation rights to ensure that the exercise of these rights does not harm the rights and safety of the victim or children.[166]

167. The 2017 Law on Preventing and Combating Domestic Violence formulates an obligation for courts and guardianship and custody authorities to take into account facts of domestic violence against a child or committed in his/her presence when taking decisions on custody and visitation rights.[167] Additionally, the guardianship and custody authorities may withdraw the exercise of custody

164. The Partial Agreement, set up at the Council of Europe Summit in Reykjavik, Iceland, on 16-17 May 2023, involves 44 states and the European Union: www.rd4u.coe.int/en/news.
165. The International Claims Commission was established based on the Convention establishing an International Claims Commission for Ukraine (CETS No. 229), adopted by the Committee of Ministers of the Council of Europe on 15 October 2025. See www.coe.int/en/web/portal/convention-establishing-an-international-claims-commission-for-ukraine
166. In the case of *Bîzdîga v. the Republic of Moldova* (Application No. 15646/18, 17 October 2023, available at https://hudoc.echr.coe.int/?i=001-228152), the European Court of Human Rights held that in proceedings concerning the custody and visitation rights regarding children in a domestic violence context, the primary focus must be on the best interests of the child, and an assessment of any risks of violence or other forms of ill-treatment therefore has to form an integral part of such proceedings. For this reason, it found that an alleged history of domestic violence was a relevant and even mandatory factor to be weighed in the assessment of domestic authorities when deciding on contact rights (§ 62). In the recent case of *Luca v. the Republic of Moldova* (Application No. 55351/17, 17 October 2023, available at: https://hudoc.echr.coe.int/?i=001-228151), the Court found a violation of Article 8 of the European Convention on Human Rights (the Convention) on account of the failure of the Moldovan authorities to take into account incidents of domestic violence in the determination of child contact rights.
167. Article 22, paragraph 4.

rights of children where guardians fail to fulfil their duties, which includes domestic violence against the child. In order to determine the child's residence, facts concerning domestic violence against the child or committed in the child's presence should also be taken into account.[168] Despite the absence of data on the number of decisions in which custody and visitation rights are suspended or withdrawn on grounds of a history of domestic violence, information brought to GREVIO's attention indicates that, in practice, very few court decisions lead to restrictions on custody and visitation rights in such cases.[169] This situation can result from a lack of training and guidance provided to judges and other child-protection authorities on the fact that joint parenting may be a means for a perpetrator of domestic violence to continue to maintain control and domination over the mother and her children and that intimate partner violence should therefore be an essential factor in determining child custody and other parental rights.

168. Moreover, GREVIO notes with concern the lack of co-ordination between civil and criminal courts. While civil judges are in charge of taking decisions on custody and visitation rights, breaches of protection orders are dealt with by criminal courts and there is no automatic communication of information between civil and criminal courts. As civil judges do not have any legal obligation to investigate whether there is a history of domestic violence in cases of divorce and decisions on custody and visitation rights, it is for the parties to indicate whether parallel criminal proceedings for violence are ongoing.

169. Furthermore, GREVIO notes with grave concern that children are often not mentioned in police records of domestic violence incidents.[170] Consequently, judges and child-protection authorities cannot discharge their duty of ensuring the safety and well-being of children when taking decisions on custody and visitation rights. Against this background GREVIO stresses that exposure of children to domestic violence breeds fear, causes trauma, adversely affects children's health and development and is recognised as a form of psychological violence.[171] Thus, it points to the need for appropriate training of law-enforcement officers, judges and other relevant professionals with a view to raising their awareness about the importance of taking into account the presence of children in cases with a history of abuse in order to protect their safety and best interests.

170. According to the information available to GREVIO, there are no specific premises to enable the exercise of visitation rights in conditions that make it possible to guarantee the safety of the children and their mother. GREVIO underlines the importance for the safety of women and children of having facilities in which visitation rights can be exercised under the supervision of specifically trained staff and with clear rules and protocols.[172] The availability of such facilities is a crucial tool to limit the secondary victimisation of women victims of violence in custody and visitation proceedings.

171. Civil society organisations active in this field have alerted GREVIO to the fact that disputes over the custody of children have become more acute since the beginning of the war of aggression by the Russian Federation. This is due to the fact that custody of at least three children is a ground for exemption from mobilisation. Moreover, GREVIO notes with grave concern allegations brought to its attention by civil society organisations active in the field of cases of abduction of children by their fathers following a divorce in situations with a history of domestic violence, in violation of court decisions on custody and with the support of an organisation disseminating hateful messages against women and inciting violence against them. Lawyers and organisations working with women victims of violence have also expressed concern that failures by law-enforcement officers to report the presence of children in cases of domestic violence can make it easier for fathers to abduct children, especially in a context marked by population displacement due to the war.[173]

168. Resolution of the Cabinet of Ministers of Ukraine of 24 September 2008 No. 866 on issues around the activities of guardianship and custody bodies related to the protection of children's rights.
169. Information obtained during the evaluation visit.
170. Information obtained during the evaluation visit. See also the submission by the Women's Perspectives centre, pp. 15-21, and Article 26, Protection and support for child witnesses.
171. See UN Committee on the Rights for the Child, General Comment No. 13, adopted on 18 April 2011, paragraph 21*e*, CRC/C/GC/13.
172. See GREVIO Thematic perspectives on the implementation of the Istanbul Convention, compilations of focus sections no. 1 to 5 (from June 2015 to December 2023), p. 52.
173. Information obtained during the evaluation visit.

172. **GREVIO urges the Ukrainian authorities to take the necessary measures to ensure that when determining custody and visitation rights and introducing measures affecting the exercise of parental authority, the competent authorities are required to take into account all incidents of violence against women and domestic violence. To this end, the Ukrainian authorities should:**

- **a. base policies and practices on the recognition that, in a context of domestic violence, joint parenting may be a means for the perpetrator to continue to maintain control and domination over the mother and her children;**
- **b. regulate co-operation between courts through legislative measures or directives so as to ensure that the authorities taking decisions on custody and visitation rights systematically take account of incidents of domestic violence;**
- **c. carry out a thorough review of the judicial practice regarding the legal provisions requiring judges to withdraw custody and visitation rights in cases of parental separation with a history of violence, in order to determine whether the current practice complies with the provisions of Article 31 of the Istanbul Convention;**
- **d. set up supervised visitation facilities, focusing on the safety of children and their mothers, staffed with trained professionals and operating on the basis of clear rules and protocols;**
- **e. encourage appropriate training and the preparation of professional guidelines alerting the relevant professionals to the harmful effects of violence on children, including child witnesses, and familiarising them with the provisions of the Istanbul Convention on custody and visitation rights.**

173. **Moreover, GREVIO urges the Ukrainian authorities to take resolute measures to investigate all allegations of incidents amounting to the abduction of children in situations of separation with a history of domestic violence.**

B. Criminal law

1. Psychological violence (Article 33) and Physical violence (Article 35)

174. Psychological violence is not criminalised as a specific offence in Ukrainian law. It is included under the definitions of domestic violence enshrined in Article 126-1 of the Criminal Code and Article 173-2 of the Code of Administrative Offences.[174] Moreover, it is covered under Article 120 and Article 129 of the Criminal Code on, respectively, incitement to suicide and the threat to kill. Physical violence is also an element of the definitions of domestic violence contained in the Code of Administrative Offences and the Criminal Code.[175] It is also criminalised outside the context of domestic violence.[176]

175. While GREVIO welcomes the existence of specialist domestic violence offences, one enshrined in the Criminal Code, one in the Code of Administrative Offences, it points to the convention's requirement to criminalise any of the behaviour set out in Articles 33 to 39. This means that in order to comply with the Istanbul Convention, acts of domestic violence, be they

174. Article 173-1 of the Ukrainian Code of Administrative Offences defines domestic violence as: "committing domestic violence, i.e. intentionally committing any act (action or failure to act) of a physical, psychological or economic nature … resulting in harm to the physical or mental health of the victims". Article 126-1 of the Criminal Code states: "domestic violence i.e. the intentional systematic infliction of physical, psychological or economic violence against a spouse or former spouse or another person with whom the perpetrator is (was) in a family or close relationship, which results in physical or psychological suffering, health disorders, loss of working capacity, emotional dependence or deterioration of the quality of life of the victim".

175. Mentioned in Article 91-1, part 6 of Article 194, paragraph 7 of Part 1 of Article 284, and Article 496 of the Criminal Procedure Code of Ukraine.

176. Physical violence is criminalised through different provisions of the Criminal Code, including Article 115 on premeditated murder; Article 121 on intentional grievous bodily harm; Article 122 on intentional bodily injury of moderate severity; Article 125 on intentional light bodily harm; Article 126 on beatings and torture; and Article 127 on torture.

psychological, physical or sexual in nature, must be criminalised. While this is the case in Ukrainian criminal law, GREVIO notes with concern that a high threshold is applied for charging decisions to be made under the Criminal Code offence of domestic violence. In order for domestic violence to be dealt with as a criminal offence, it must be perpetrated in a "systematic" manner.[177] Incidents of domestic violence below this threshold are generally handled as an administrative offence. In the absence of a legal definition of the term "systematic", the practice seems to vary significantly across the country.[178] According to the authorities, domestic violence is considered systematic and will come within the remit of the Criminal Code, if it has prompted three consecutive charges under the administrative offence or if a protection order has been issued.[179]

176. GREVIO notes with concern that the current legal framework operates on the basis of two co-existing offences for domestic violence without clear guidance as to their application and the criteria to use. While noting that draft law No. 12297 of 9 December 2024 providing for amendments to the Criminal Code contains a definition of the concept of "systematic violence" so as to ensure a more consistent interpretation, GREVIO points to the fact that the types of sanctions applicable under the administrative offence compared to that of the criminal offence differ greatly and generally amount to a fine. In view of the convention's requirement to criminalise physical, sexual and psychological violence as elements of domestic violence, an approach that allows for administrative sanctions for such behaviour is inadequate. GREVIO thus points to the need to ensure criminal liability for the intentional conduct that constitutes domestic violence. One way of achieving this would be to remove the administrative offence of domestic violence to ensure that acts of domestic violence are punishable by effective, proportionate and dissuasive criminal sanctions that may involve the deprivation of liberty, where appropriate.

177. GREVIO notes that, in the absence of an offence of stalking, some forms of violence against women committed in the digital sphere, such as online stalking, are increasingly treated by the prosecution services as psychological violence.[180] Ensuring criminal responsibility for acts of psychological violence committed online and through the use of technology is important in view of this growing phenomenon. In this regard, GREVIO points to its General Recommendation No. 1 on the digital dimension of violence against women, in which it explained that all forms of violence against women perpetrated in the digital sphere have a psychological impact and could be categorised as psychological violence exerted online and with the use of technology. Moreover, individual acts of violence that are not criminalised may reach the threshold of psychological violence when combined with the mob mentality and repetition facilitated by the internet: a teasing comment may escalate to cyberbullying when made repetitively or by a large number of people. Certain groups of women, including politicians, journalists and human rights defenders and activists, are particularly exposed to such violent acts.[181] In addition, online hate speech, defamation and other forms of abuse perpetrated in the digital sphere can have an enormous psychological impact on victims and are increasingly widespread. GREVIO therefore points to the need to ensure the effective criminalisation of the behaviour set out in Article 33 of the Istanbul Convention.

178. **GREVIO encourages the Ukrainian authorities to ensure that acts of psychological violence, including single or isolated acts and those committed in the digital sphere, are criminalised.**

179. **GREVIO strongly encourages the Ukrainian authorities to ensure criminal liability for the intentional conduct of physical violence in the context of domestic violence.**

177. See Article 3, Definitions.
178. Information obtained during the evaluation visit.
179. Information obtained during the evaluation visit.
180. Information obtained during the evaluation visit.
181. GREVIO's General Recommendation No. 1 on the digital dimension of violence against women, adopted on 20 October 2021, paragraphs 43-44.

2. Stalking (Article 34)

180. In Ukrainian legislation, there is no specific offence of stalking that meets the requirements of Article 34 of the Istanbul Convention. The 2017 Law on Preventing and Combating Domestic Violence considers stalking as one of the forms of psychological violence.[182] In practice, administrative liability for stalking as a form of psychological violence arises under Article 173-2 of the Code of Administrative Offences if committed once; if the offence is repeated once within the previous year, it is considered as a repeated administrative offence.[183] If committed three times or more, it is considered systematic and can be prosecuted under Article 126-1 of the Criminal Code, as a domestic violence offence. It is not possible to identify the number of cases of stalking that have been brought to courts and prosecuted as part of domestic violence.

181. GREVIO notes that beyond the context of domestic violence, the Ukrainian legislation currently does not enshrine criminal liability for the intentional conduct of repeatedly engaging in threatening conduct directed at another person, causing him or her to fear for their safety. It notes with interest that a draft law providing for amendments to the Criminal Code and the Code of Criminal Procedure aimed at improving compliance with the Istanbul Convention includes the offence of stalking.[184] GREVIO points to the need to criminalise the intentional conduct of stalking that fully meets the requirements of Article 34 of the Istanbul Convention and that is subject to an effective and dissuasive punishment. It is essential that the constituent elements of the offence allow law-enforcement officers, prosecution services and members of the judiciary to draw the distinction with psychological violence and make full use of this provision to prosecute and sanction stalking, including in its digital dimension.

182. **GREVIO strongly encourages the Ukrainian authorities to criminalise the intentional conduct of stalking as defined in Article 34 of the Istanbul Convention, including by considering establishing a specific offence, to enable incidents of online and offline stalking to be investigated, prosecuted and punished effectively.**

3. Sexual violence, including rape (Article 36)

183. In 2017, the Criminal Code definitions of rape and of sexual violence were amended to better align with Article 36 of the Istanbul Convention, even though the convention had not yet been ratified by Ukraine. The definition of rape covers any sexual act involving vaginal, anal or oral penetration committed without the voluntary consent of the victim, including “acts committed against a spouse or former spouse or another person with whom the perpetrator is (was) in a family or close relationship” (Article 152 on rape). According to the Criminal Code, consent is considered voluntary if it is the result of a person’s free will, taking into account the surrounding circumstances.[185] GREVIO notes with satisfaction this alignment with the requirements set out in Article 36 of the Istanbul Convention and acknowledges the efforts made by the Ukrainian authorities to train judges on understanding how to evaluate consent in the light of the surrounding circumstances.

184. However, sexual violence is defined as “any violent act of a sexual nature not involving penetration without the voluntary consent of the victim” (Article 153 on sexual violence).[186] GREVIO notes with concern that this definition appears to imply that the use of violence is a constitutive element of the offence, while at the same time referring to the notion of consent. This dual framing risks creating ambiguity and potential misunderstandings regarding the central role of consent in

182. Article 1-14.
183. Article 173-2, paragraph 3, of the Code of Administrative Offences.
184. Draft law No. 12297 of 9 December 2024 “On Amendments to the Criminal Code and the Code of Criminal Procedure of Ukraine to Ensure the Full Implementation of International Law Provisions on Combating Domestic and Other Forms of Violence, Including Violence Against Children.”
185. Article 152 of the Criminal Code.
186. Articles 152 and 153 of the Criminal Code.

defining sexual violence. GREVIO highlights that any definition of sexual violence implying the use of violence is not in line with Article 36 of the Istanbul Convention.[187]

185. In addition to the definitions of rape and sexual violence, the Criminal Code also criminalises forcing a person to perform a sexual act with another person, committing sexual acts with a person under the age of 16, committing lewd acts against a person under the age of 16 and the solicitation of a child for sexual purposes.[188]

186. Information brought to GREVIO's attention indicates, however, that despite this important legislative change, patriarchal stereotypes and rape myths persist in Ukrainian society, including in the judiciary, leading to low reporting and conviction rates. Discrepancies in interpretations given by lower courts to Articles 152 (rape) and 153 (sexual violence) persist when it comes to assessing whether the victim consented or not, the use of force or threat still being used as a decisive element of rape in contradiction with the constituent elements of the amended criminal offence.[189]

187. The statute of limitation for rape and sexual violence without aggravated circumstances is five years, calculated from the commission of the offence until the issuance of a final judgment.[190] GREVIO stresses that short statutes of limitation may seriously hamper women's access to justice for experiences of rape. It highlights the fact that victims of rape often need time, sometimes several years, to be able to report the violence that was inflicted on them. Having enough time to initiate legal proceedings is even more important for child victims of sexual violence. It is therefore important to ensure that the statute of limitation for initiating any legal proceedings for sexual violence continues for a period of time that is sufficient and commensurate with the gravity of the offence, to allow for the efficient initiation of proceedings after the victim has reached the age of majority, as prescribed by Article 58 of the Istanbul Convention.

188. Conflict-related sexual violence has been defined since 2024 as sexual violence committed against any person in connection with Russia's war of aggression, beginning 20 February 2014. The definition covers rape, forced pregnancy or sterilisation, sexual slavery, forced prostitution, sexual exploitation, and threats or attempts thereof.[191] It is usually prosecuted under Article 438 of the Criminal Code on war crimes, which does not, however, specifically mention sexual violence. GREVIO takes note of the fact that, in October 2024, Ukraine ratified the Rome Statute of the International Criminal Court and adopted the Law on Amendments to the Criminal Code and the Criminal Procedure Code of Ukraine in Connection with the Ratification of the Rome Statute of the International Criminal Court and its Amendments, which made it possible to incorporate the most serious international crimes into domestic legislation, including crimes against humanity, genocide and conflict-related sexual violence .[192]

189. **GREVIO urges the Ukrainian authorities to take steps to ensure that the definition of sexual violence in the Criminal Code fully complies with Article 36 of the Istanbul Convention.**

187. See GREVIO, Focus section no. 4 on "Approaches taken in states parties to the Istanbul Convention on the criminalisation and prosecution of sexual violence, including rape", 2023, in Thematic perspectives on the implementation of the Istanbul Convention, 2025.
188. Respectively, Articles 154, 155, 156 and 156-1 of the Criminal Code.
189. See Article 50, Immediate response, prevention and protection. See also the NGO shadow report "Sexual violence and stigmatisation of victims", submitted by EHRAC, Women's Initiative for Gender Justice, La Strada Ukraine, ULAG and Equality Now, July 2024.
190. Article 442-1 of the Criminal Code. No statute of limitations applies to conflict-related sexual violence. For sexual violence committed against a child, the statute of limitation is of 10 years, extended to 15 in case of rape. It begins upon reaching the age of majority.
191. Law No. 4067-IX of 20 November 2024 on the legal and social protection of survivors of sexual violence related to the armed aggression of the Russian Federation against Ukraine, and the provision of urgent interim reparations to them.
192. Law No. 11484 of 9 October 2024 on Amendments to the Criminal Code and the Criminal Procedure Code of Ukraine in Connection with the Ratification of the Rome Statute of the International Criminal Court and its Amendments.

190. **GREVIO strongly encourages the Ukrainian authorities:**

a. to take steps to further improve the legislation governing offences of sexual violence with a view to removing the remaining barriers that limit the effectiveness of the definition of rape based on the notion of freely given consent;
b. to ensure sufficient time to initiate and complete legal proceedings in cases of rape.

4. Forced marriage (Article 37)

191. Since 2017, Article 151-2 of the Ukrainian Criminal Code has criminalised forced marriage and forced cohabitation and the act of "inducing a person to move to the territory of a state other than the one in which he or she resides for this purpose". Additionally, the act of inducing forced marriage repeatedly, or by conspiracy of a group of persons, or against a person under the legal age of marriage (18 or 16 if authorised by a court) or against two or more persons, is also criminalised.

192. While commending the Ukrainian authorities for having criminalised forced marriage in line with Article 37 of the Istanbul Convention, GREVIO notes that only two cases of forced marriage have been registered since 2018.[193] This very low prosecution rate may stem from victims' reluctance to bring criminal proceedings against family members and those they are close to, from the difficulty of providing evidence of coercion and from fear of reprisals. In GREVIO's view, a detailed analysis of the obstacles that may prevent victims of forced marriages from lodging complaints, and of any procedural barriers, is needed to better understand the situation.

5. Female genital mutilation (Article 38)

193. Article 121 of the Criminal Code criminalises "genital mutilation as intentional grievous bodily harm". GREVIO notes that this conceptualisation of genital mutilation does not correspond to the conduct that Article 38 requires parties to the convention to criminalise. It notes that a draft law aimed at further aligning Ukrainian legislation with the requirements of the Istanbul Convention contains a new definition of genital mutilation (FGM).[194] However, the conduct covered in the draft law does not entirely meet the requirements of Article 38 of the convention. While it aims at criminalising "intentional grievous bodily harm that has caused the (…) mutilation of genital organs", as well as "inducing or coercing a person to mutilate his/her genital organs", it does not cover the intentional conduct of "excising, infibulating or performing any other mutilation" required by Article 38 a. Moreover, GREVIO notes that both Article 121 as currently phrased and the draft law providing for a new definition do not refer specifically to acts of mutilation performed on a woman's labia majora, labia minora or clitoris.

194. **GREVIO strongly encourages the Ukrainian authorities to take additional measures, including legislative ones, in order to ensure that the offence of female genital mutilation is fully aligned with Article 38 of the Istanbul Convention and with the convention's aim to prosecute and punish this offence and to support and protect victims.**

6. Forced abortion and forced sterilisation (Article 39)

195. Article 134 of the Ukrainian Criminal Code criminalises "forced abortion without the voluntary consent of the victim" and "forced sterilisation without the voluntary consent of the victim". GREVIO notes, however, that very few criminal proceedings for these offences have been initiated.[195] According to the authorities, this is because such practices do not occur in Ukraine, including in institutions for people with disabilities. But GREVIO notes that there have been allegations of

193. Unified Report on Criminal Offences.
194. Draft law no. 12297 of 9 December 2024 on "Amendments to the Criminal Code and the Criminal Procedure Code of Ukraine on Ensuring the Completeness of Implementation of International Legal Standards in Combating Domestic and Other Forms of Violence."
195. According to the Unified Report on Criminal Offences, no such offences were registered in the period 2023-2024 and only one case was registered in 2020 and one in 2021.

the administration of contraceptives without consent to women with intellectual and/or psychosocial disabilities who reside in long-term care facilities, including by coercion and threat.[196]

196. Moreover, GREVIO highlights that the current definition of forced sterilisation does not provide any detail on this form of violence, unlike Article 39 of the Istanbul Convention, which defines forced sterilisation as "performing surgery which has the purpose or effect of terminating a woman's capacity to naturally reproduce without her prior and informed consent or understanding of the procedure". The limited conceptualisation of forced sterilisation, provided by the Criminal Code, focusing exclusively on the formal absence of consent to the procedure, might hinder the understanding and detection of cases of forced sterilisation of women by the relevant professionals. In view of the very limited number of cases of these forms of violence brought to the attention of the authorities, GREVIO considers that investigations into the reasons for such low numbers should be undertaken to assess whether they indeed result from a low prevalence of these forms of violence or from gaps in the legislation or barriers in detecting and reporting cases of forced abortion or forced sterilisation.

197. **GREVIO strongly encourages the Ukrainian authorities to take measures to amend the Criminal Code to cover the intentional conduct of performing surgery that has the purpose or effect of terminating a woman's capacity to naturally reproduce without her prior and informed consent or understanding of the procedure.**

7. Sexual harassment (Article 40)

198. GREVIO welcomes the adoption, in 2024, of an administrative provision introducing liability for sexual harassment, defined as "the intentional commission of offensive, humiliating acts of a sexual nature expressed verbally or non-verbally (words, gestures, body movements, including through electronic communications), against the person's will".[197] It notes, however, that the definition adopted does not fully align with Article 40 of the Istanbul Convention, which defines sexual harassment as "unwanted, verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person … when creating an intimidating, hostile, degrading and humiliating or offensive environment". Before the adoption of this new administrative offence, GREVIO understands that sexual harassment was often recorded and prosecuted as "hooliganism" without any consideration for the gendered dimension of this form of violence.[198] Sexual harassment appears to be widespread in different spheres of life and has been reported to also occur in places such as bomb shelters where people take refuge during shelling. Sexual harassment in the digital sphere is also a growing concern, with women in certain professions being especially targeted (such as women in politics and journalists).[199] However, it appears that very few women and girls in Ukraine report this form of violence.

199. In the defence sector, measures have been taken to allow the reporting of abuse, including sexual harassment, through specific helplines, which GREVIO welcomes. It notes with interest that, in 2025, a draft law on internal disciplinary measures to prevent and combat sexual harassment, gender-based violence, gender-based discrimination and offences against the sexual integrity and freedom in the armed forces was being prepared.[200] In view of the large number of women involved in the Ukrainian armed forces, which is approximately 70 000, it is essential to ensure that they are adequately protected against all forms of violence against women, including sexual harassment.

200. Information brought to GREVIO's attention indicates that there is a need for awareness raising and training of all professionals, in particular law-enforcement officers, to identify and

196. UN Committee on the Rights of Persons with Disabilities, Concluding observations on the combined second and third periodic reports of Ukraine, 2 October 2024, paragraphs 34 and 35.
197. Article 173-7 of the Code of Administrative Offences.
198. See the submission by JurFem.
199. See Article 17, Participation of the private sector and the media.
200. Draft law no. 13037 on amendments to the Disciplinary Statute of the Armed Forces of Ukraine and the Statute of the Internal Service of the Armed Forces of Ukraine regarding the improvement of mechanisms for ensuring military discipline, preventing and countering manifestations of discrimination and sexual harassment.

investigate sexual harassment in compliance with the new administrative law provision. Police officers and prosecutors still too often incorrectly classify cases of sexual violence as sexual harassment, the latter being an administrative offence carrying less severe sanctions.[201] In this context, GREVIO notes with interest the authorities' intention to step up training of the police and other professionals on sexual harassment. It considers it important that guidance is provided to them on how to identify and prosecute sexual harassment, including in the digital sphere.

201. **GREVIO welcomes the steps taken by the Ukrainian authorities to introduce a specific offence of sexual harassment and encourages them to take additional steps to ensure that the definition of sexual harassment fully aligns with Article 40 of the Istanbul Convention.**

8. Unacceptable justifications for crimes, including crimes committed in the name of so-called "honour" (Article 42)

202. GREVIO notes with satisfaction that, according to the 2017 law on domestic violence, "customs, religious beliefs, creeds, traditions cannot be considered as a justification for any form of domestic violence … or be a ground for exemption of the perpetrator from liability".[202] However, it is unclear to what extent and how this is implemented in practice in judicial proceedings.

9. Sanctions and measures (Article 45)

203. The sanctions foreseen for offences of domestic violence under Article 126-1 of the Criminal Code include community service and fines. In 2024, out of 1 349 persons convicted under Article 126-1, 450 were sentenced to community service, 399 were released from criminal liability and placed on probation, 85 were detained, 109 were sentenced with restrictions to their liberty and 22 were fined.[203] Sanctions for sexual harassment also consist in administrative penalties in the form of a fine, community service or correctional labour. Perpetrators of administrative offences can also be kept in preventive detention for 12 hours.[204]

204. Experts in the field alerted GREVIO to the fact that several factors limit the effective implementation of community service. These including safety concerns connected to the ongoing war, the fact that local authorities are in charge of implementing such sanctions and often lack resources to do so, and evasion from the sanction by perpetrators alleging illness and other circumstances. Additionally, probation authorities often submit to courts' requests to substitute community work with a fine.[205]

205. GREVIO notes with concern that sentences for the different forms of violence are generally lenient and often limited to a fine and community service. It points out in particular that the imposition of fines may have a detrimental impact on the family budget, should the perpetrator not be able to assume his financial obligations, and is hence often perceived negatively by victims, who may be deterred from reporting. In addition, GREVIO notes with interest the amendments in 2024 to Article 22 of the Code of Administrative Offences that remove the possibility of issuing a verbal warning and hence closing a case of domestic violence. It wishes to draw attention to the fact that the convention requires sanctions that match the seriousness of the offence and that are effective, proportionate and dissuasive.[206] Therefore, it emphasises the importance of ensuring that all offences established under the Istanbul Convention are punishable by effective, proportionate and dissuasive sanctions and that full use is made of the sentencing range in order to build public trust in the system and send the message that violence against women is not acceptable.

201. Information obtained during the evaluation visit.
202. Article 4, part 4.
203. State Judicial Administration's statistical form no. 6/2024.
204. Article 263 of the Code of Administrative Offences.
205. Information obtained during the evaluation visit.
206. Explanatory Report to the Istanbul Convention, paragraph 232.

206. **GREVIO urges the Ukrainian authorities to ensure that sentences and measures imposed for offences of domestic violence and other forms of violence against women covered by the scope of the Istanbul Convention are effective, proportionate and dissuasive, including where appropriate, sentences involving the deprivation of liberty. Pending changes to the legislative framework, the Ukrainian authorities should ensure that sanctions imposed under the Code of Administrative Offences are effective, dissuasive and proportionate.**

10. Aggravating circumstances (Article 46)

207. Several of the aggravating circumstances required by Article 46 of the Istanbul Convention form part of the elements of the crime in the Ukrainian Criminal Code, thus qualifying them as more serious offences punishable by harsher sentences. These include circumstances such as the fact that "the offence is committed against a former or current spouse or another person with whom the perpetrator is (was) in a family or close relationship" or "against or in the presence of a child".

208. However, information brought to GREVIO's attention indicates that these aggravating circumstances are not systematically applied in cases of domestic violence.[207] It is unclear to what extent the application of aggravating circumstances regarding other forms of violence against women is ensured. Furthermore, GREVIO notes with regret that the circumstance that "the offence was committed with the use or threat of a weapon" (Article 46, paragraph *g*, of the Istanbul Convention) is not included in the exhaustive list of aggravating circumstances enshrined in Article 67 of the Criminal Code. Similarly, the fact that an offence is preceded or accompanied by extreme levels of violence does not form part of the list, although Article 67 spells out the circumstance of "committing a crime with particular cruelty".

209. GREVIO strongly encourages the Ukrainian authorities to take measures to ensure that all circumstances listed in Article 46 of the Istanbul Convention may be taken into consideration as aggravating circumstances for all forms of violence covered by the Istanbul Convention and that they are effectively applied by the judiciary.

11. Prohibition of mandatory alternative dispute resolution processes or sentencing (Article 48)

210. In Ukraine, alternative dispute resolution procedures (referred to as "conciliation" in the Ukrainian Criminal Code) can be concluded as part of criminal proceedings in cases concerning misdemeanours, minor crimes and private criminal proceedings. The law does not explicitly prohibit such a procedure in criminal cases involving violence against women, except regarding criminal offences related to domestic violence, which may be concluded only at the initiative of the victim, his/her representative or legal representative.[208] However, civil society organisations and lawyers working with women victims of violence have alerted GREVIO to the fact that women are often encouraged to enter an alternative dispute resolution procedure by police officers or legal professionals who are not sufficiently trained on the dynamics of domestic violence and the dangers of alternative dispute resolution processes in such cases. Moreover, women may perceive such an alternative process as compulsory due to a lack of information on the procedure and for fear of negative outcomes. As a result of the ongoing abuse, manipulation and control, women victims of domestic violence do not enter such procedures on a par with the perpetrator. As GREVIO has had occasion to note, it is important to ensure women victims' full and informed consent when proposing alternative dispute resolution, duly explaining the voluntary nature of such processes and their impact on the criminal proceedings.[209] It stresses that practices that suggest reaching agreements or amicable settlements between victims and abusers as an alternative to court-imposed regulations, with refusals carrying the potential for negative outcomes for victims, may be tantamount to mandatory mediation (i.e. quasi-mandatory mediation).

207. See, for example, the submission by JurFem.
211. Article 469 of the Code of Criminal Procedure.
212. First thematic evaluation report on Italy, paragraphs 112-114.

211. Furthermore, GREVIO notes with concern that in criminal proceedings related to forms of violence against women other than domestic violence, alternative dispute resolution procedures are still possible in cases of misdemeanours, minor crimes and private criminal proceedings. This implies that alternative dispute resolution is an option, *inter alia*, in cases of rape or sexual violence without aggravating circumstances, which are not prosecuted *ex officio*. GREVIO stresses the importance of ensuring that adequate safeguards are in place to guarantee the full and informed consent of women to alternative dispute resolution processes in such circumstances. Against this background, GREVIO notes with interest the existence of a draft law according to which the list of offences in which a settlement agreement can be concluded only at the initiative of the victim, his/her representative or legal representative is expanded to include cases of rape and sexual violence, forced marriage, forced abortion and forced sterilisation.[210]

212. In civil law, GREVIO welcomes the amendment in 2024 of the Family Code to prohibit reconciliation, aimed at reuniting couples wishing to separate, in situations with a history of domestic violence and gender-based violence.[211] However, it notes with concern that when no parallel criminal or administrative cases of domestic violence are opened, judges do not necessarily screen for a history of coercive control and abuse and therefore still often impose a reconciliation period of six months.

213. GREVIO draws attention to the fact that separation from a perpetrator of domestic violence frequently entails significant risks for victims and their children, and the practice of requiring a reconciliation period is likely to increase the risks for women because they remain under the control of the perpetrator and are easily exposed to further violence. Reconciliation periods may therefore jeopardise the safety of women and her children leaving an abusive relationship. More must be done, including by ensuring robust screening in any requests for divorce to ascertain whether the relationship has been marred by violence, to ensure that the newly introduced prohibition of reconciliation is upheld in cases with a history of abuse.

214. In addition to prohibiting alternative dispute resolution processes in cases involving all forms of violence against women, GREVIO considers it essential to ensure that mediators and other professionals involved in alternative dispute resolution processes and other out-of-court proceedings are trained and receive adequate guidance on the dynamics of domestic violence and the risks for women victims of entering such processes.

215. GREVIO urges the Ukrainian authorities to take legislative and any other steps to ensure that in criminal proceedings alternative dispute resolutions processes do not constitute quasi-mandatory mediation in cases with a history of domestic violence and that they are not imposed on women victims of any form of violence against women.

216. While welcoming measures to prohibit reconciliation in divorce cases with a history of domestic violence, GREVIO strongly encourages the Ukrainian authorities to introduce screening mechanisms to ensure the systematic detection of domestic violence by judges and mediators with a view to effectively implementing the prohibition of reconciliation in family law cases with a history of domestic violence.

213. Draft law on amendments to the Criminal Procedure Code of Ukraine on the conclusion of reconciliation agreements and criminal proceedings in the form of private prosecution in connection with the ratification of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention).
214. In Ukraine, there is a practice of granting a reconciliation period of up to six months to spouses willing to divorce.

VI. Investigation, prosecution, procedural law and protective measures

217. Full accountability for all acts of violence against women requires an adequate response from law-enforcement agencies and the criminal justice sector. Chapter VI of the Istanbul Convention establishes a set of measures to ensure criminal investigations, prosecutions and convictions of the various forms of violence covered therein.

A. General obligations (Article 49) and Immediate response, prevention and protection (Article 50)

218. A key principle of an adequate response to violence against women is that of swift and effective investigations and judicial proceedings that are based on a gendered understanding of these types of offences and that take into consideration the rights of the victim during all stages.

1. Reporting to, immediate response and investigations by law-enforcement agencies

219. In 2024, the police recorded 2 810 cases of domestic violence under Article 126-1 of the Criminal Code, compared to 1 498 in 2022 and 2 705 in 2023.[212] Moreover, according to the data available to GREVIO, in 2024, over 100 000 people were brought to administrative liability under Article 173-2 of the Code of Administrative Offences.[213] Among the measures taken to improve the police response to violence against women, GREVIO welcomes the operation, since 2018, of mobile police response groups to domestic violence incidents, composed of police officers trained on how to respond to cases of domestic violence and able to reach out to victims in the places where they live. There are currently 86 such mobile units. GREVIO notes that their work is all the more important in the context of the war of aggression by the Russian Federation in which women victims of violence face increased barriers to accessing support services, including the police, especially in areas heavily affected by the war. There is, however, a need for more such specialised mobile units in order to meet existing demands. Additionally, police emergency helpline operators have been trained to better detect and assist victims of domestic violence. An app for women in need of emergency help has also been developed to enable them to contact the police rapidly and discreetly.[214] Last, the law on domestic violence prescribes the right for a victim to talk to a female police officer.[215]

220. Despite these positive steps, according to indications from civil society organisations, a substantial number of reports and calls by women victims of domestic violence go unrecorded and are not responded to by the police. GREVIO notes with concern consistent reports indicating that police officers often consider that domestic violence that has not resulted in grave physical consequences is not serious enough to trigger protection or other measures.[216] While increased training has been made available following the introduction of new offences into Ukrainian law, the capacity among police officers to recognise and understand the seriousness of psychological violence seems to remain limited beyond the specialised units. The view that domestic violence is mainly a private matter, unless it results in serious physical consequences, seems to prevail among law-enforcement officers. Furthermore, GREVIO notes with concern the lack of recording, in situations of domestic violence, of the presence of children and the lack of effective response given

212. Unified Report on Criminal Offences.
213. Information obtained during the evaluation visit.
214. The app KRYLA.
215. Article 21 of the law on domestic violence prescribes that “a victim shall be entitled to … select a specialist based on their sex”.
216. Information obtained during the evaluation visit. See also the submissions by the Women’s Perspectives centre and by EHRAC/Women’s initiatives/La Strada/ULAG/Equality Now, 2024. See also Article 26, Protection and support for child witnesses.

to children contacting the police for support in cases of domestic violence.[217] Additionally, the capacity of police officers to deal with the growing digital dimension of violence against women, including violence against women journalists, remains limited.

221. Furthermore, GREVIO notes with concern persisting gaps in the police response to victims of sexual violence and rape outside of conflict-related sexual violence, such as victim-blaming attitudes, unjustified investigations into the victim's sexual history and conduct, the lack of a victim-centred and trauma-informed approach and the lack of a context-sensitive assessment of the evidence in order to establish whether the victim has freely consented to a sexual act.[218] Consequently, many women victims of sexual violence do not report violence to the police. In 2024, only 389 criminal offences were recorded by the police under Article 152 of the Criminal Code (rape) and 157 under Article 153 (sexual violence).[219]

222. In contrast, GREVIO commends the resolute measures taken since 2022 to encourage reporting by victims of conflict-related sexual violence and to investigate and prosecute such cases. A specialised police unit in charge of dealing with war crimes, including conflict-related sexual violence, was set up in 2022 and police officers have been trained to provide a trauma-informed response centred around the needs and safety of the victim.[220] Despite these measures, it notes the widespread reluctance among women victims to report conflict-related sexual violence to the police, due to a persisting lack of trust in institutions but also the shame and stigma associated with this form of violence. In order to ease reporting, GREVIO highlights the importance of strengthening the intersectional approach to better respond to the needs of victims of conflict-related sexual violence such as LBTI women, Roma women or women with disabilities. They require a response that is adapted to their specific needs and vulnerabilities. Lessons learned from responding to the needs of victims of conflict-related sexual violence could be usefully applied to the overall response of the Ukrainian police to victims of all forms of violence against women covered by the Istanbul Convention.

223. While welcoming the measures taken to respond to victims of conflict-related sexual violence, GREVIO urges the Ukrainian authorities to improve the response of the law-enforcement authorities to women victims of all forms of violence covered by the Istanbul Convention. They should in particular:

- **a. provide all relevant law-enforcement authorities with the resources, knowledge and powers to respond promptly, appropriately and with a gender-sensitive and trauma-informed perspective to all forms of violence covered by the Istanbul Convention, including sexual violence, psychological violence, sexual harassment and violence committed in the digital sphere;**
- **b. increase the availability of specialised units for domestic violence, including mobile units;**
- **c. develop further guidance for police officers to ensure the systematic identification and adequate needs assessment and protection of children exposed to domestic violence;**
- **d. identify and address any obstacles preventing victims from reporting violence against women, in particular sexual violence;**
- **e. identify the expertise accumulated by the police teams in charge of dealing with victims of conflict-related sexual violence, take measures to formalise these skills and further disseminate them.**

217. Information obtained during the evaluation visit. See also the submission by the Women's Perspectives centre. It is to be noted that, since 2020, a procedure has been in place to assess a child's safety level with the aim of immediately identifying threats to the life or health of a child who has been subjected to abuse (pursuant to Resolution No. 585 of the Cabinet of Ministers of Ukraine dated June 1, 2020 "On Ensuring Social Protection for Children in Difficult Life Circumstances).
221. Information obtained during the evaluation visit.
219. Source: Unified report on criminal offences for 2024: www.gp.gov.ua/ua/posts/pro-zareyestrovani-kriminalni-pravoporushennya-ta-rezultati-yih-dosudovogo-rozsliduvannya-2.
220. See also Article 15, Training of professionals.

2. Effective investigation and prosecution

224. GREVIO welcomes the setting up in 2023 of a specialised unit on domestic violence in the Prosecutor General's Office in response to the growing number of cases of violence reported by victims. A specialisation programme was also introduced for regional and local level investigators and prosecutors on how to conduct pretrial investigations in criminal proceedings related to domestic violence offenses and oversee such proceedings. Additionally, standards for pretrial investigation of criminal offences related to domestic violence are being developed.[221] However, GREVIO reiterates its concern about the reported difference in practice among law-enforcement officers, notably in terms of their interpretation of the systematic nature of domestic violence, as well as the reported lack of training of some law-enforcement officers on newly introduced offences, such as sexual harassment, or on the digital manifestations of violence against women.[222]

225 Another difficulty lies with the understanding and interpretation of the criminal provision providing for "crimes related to domestic violence". While no definition is provided in the Criminal Code for this category of offences, the Supreme Court has interpreted it as "the commission of a crime, but also other socially dangerous acts that have signs of domestic violence".[223] Situations in which this provision can be used include for example a crime committed against a partner/ex-partner or a murder committed in the presence of a child. GREVIO understands that this provision is designed to cover offences related to domestic violence that are not included in Article 126-1 on domestic violence and that require greater sanctions than those foreseen under Article 126-1, such as serious bodily harm or rape. However, in practice, it appears that there is little clarity on whether to use this qualification or aggravating circumstances.[224] GREVIO notes with concern that this lack of clarity makes it difficult to apply this provision in practice and to benefit from the procedural guarantees provided for this offence, such as the possibility of continuing prosecution in case the victim withdraws her statement or of allowing a reconciliation procedure only at the initiative of the victim.[225] It also has an impact on the application of Article 91-1 of the Criminal Code, which provides for the application of restrictive measures in the interests of a victim of a crime related to domestic violence.

226. Information brought to GREVIO's attention also highlights the difficulty for women victims of violence committed by spouses or partners serving in the military to report domestic violence. Against this background, GREVIO notes with concern that domestic violence incidents involving military personnel may be handled by military officials rather than law-enforcement agencies, without any reports made to the police and subsequent investigations opened.[226] Against this background, it welcomes the adoption of guidelines on the elimination of gender-based violence in the army and takes note of the existence of a draft law on combating discrimination, sexual harassment and other forms of gender-based violence.[227] Moreover, GREVIO considers it important that law-enforcement officers are provided with guidance highlighting the importance of adequately investigating all cases of domestic violence, including those committed by military personnel, and avoiding impunity for such offences.

227. As regards sexual violence and rape, GREVIO notes with concern the restrictive interpretation of the notion of consent by some prosecutors at the stage of investigations.[228] Despite an increasing number of cases of rape and sexual violence being referred to courts for criminal proceedings, a context-sensitive assessment of the evidence in order to establish whether or not the victim has freely consented to the sexual act is not always carried out. This situation results in persisting over-reliance on evidence resulting from physical examinations, including unnecessary

221. See the addendum to the state report, pp. 20-21. See also Article 56, Measures of protection.
222. See Article 33, Psychological violence.
223. Supreme Court Decision of 7 April 2020, case no. 647/1931/19[1].
224. Information obtained during the evaluation visit.
225. See Article 48, Prohibition of mandatory alternative dispute resolution processes or sentencing, and Article 55, *Ex parte* and *ex officio* proceedings.
226. See the submission by the Women's Perspectives centre.
227. Draft law 13037, see Article 40, Sexual harassment.
228. Information obtained during the evaluation visit. See also the submission by EHRAC/Women's initiatives/La Strada/ULAG/Equality Now.

gynaecological examinations imposed on women victims, which GREVIO notes with concern.[229] This, as well as the reported practice of re-enacting the crimes at the crime scene in order to assess the victim's credibility, may amount to secondary victimisation, which GREVIO notes with grave concern.[230] In this context, GREVIO notes with satisfaction that joint training sessions are being conducted for investigators and prosecutors, in order to help gradually mitigate the risks of subjective interpretation of the concept of "voluntary consent" and to ensure a consistent interpretation of this notion.

228. As regards conflict-related sexual violence, the comprehensive efforts of the Ukrainian authorities made since 2022 and supported by international partners have resulted in important steps being taken to hold perpetrators accountable. As of 1 January 2026, 391 instances of conflict-related sexual violence had been documented since the beginning of the war of aggression by the Russian Federation by the Prosecutor General's Office, of which 245 were committed against women. At the time of GREVIO's visit, 128 criminal proceedings for conflict-related sexual violence had been initiated, 23 people had been indicted and 16 convicted.[231] In 2022, an agreement was concluded between the Ukrainian authorities and the UN Special Representative on sexual violence in conflict to enhance protection and response to sexual violence occurring as a result of the war of aggression by the Russian Federation. The agreement foresees, *inter alia*, joint action and partnerships to develop relevant policies, enhance protection and mitigate the risk of conflict-related sexual violence, ease reporting and evidence collection and increase the capacity of law enforcement and the judiciary to handle such cases. In 2023, a specialised unit was set up in the Prosecutor General's Office to deal specifically with conflict-related sexual violence and a "Strategy to ensure a victim and witness-focused approach to conflict-related sexual violence prosecution" was adopted. Specialised prosecutors are also operating in regional prosecutors' offices. Standards for pretrial investigations of war crimes, including conflict-related sexual violence, have been adopted. Within this framework, prosecutors have benefited from substantial training in order to adopt a victim-centred and trauma-informed response. Practices and tools have been put in place to limit secondary victimisation and improve the victim's well-being, such as the adoption of procedural guidelines for interviews, measures to avoid repeated testimonies, the presence as needed of supporting persons (psychologists or NGOs), information of the victim throughout the process, anonymisation of the files and measures to avoid changes in investigators assigned to a case in order to reinforce the trust of the victim. GREVIO commends the political will demonstrated by the Ukrainian authorities to prioritise investigations into and the prosecution of conflict-related sexual violence and to develop an approach centred on the needs and safety of the victims, in spite of the very difficult working conditions prosecutors investigating such cases are confronted with.

229. Moreover, GREVIO welcomes the ongoing co-operation with the International Criminal Court to ease the reporting and investigation of crimes covered by the Rome Statute. While noting that the Prosecutor General's Office was recently restructured, GREVIO considers it essential that the work on conflict-related sexual violence continues to be given high priority in the investigation into and prosecution of war crimes and crimes against humanity, to provide redress to the victims and overcome impunity for such crimes.

230. GREVIO strongly encourages the Ukrainian authorities to take further measures to:

- **a. ensure a context-sensitive interpretation of the circumstances of non-consensual sexual acts, through standardised operating procedures for prosecutors, in order to ensure a common understanding of rape and sexual violence as offences based on the absence of consent;**
- **b. ensure a uniform approach by law-enforcement authorities to all cases of domestic violence.**

229. Submission by EHRAC/Women's initiatives/La Strada/ULAG/Equality Now.
230. Ibid.
231. Data provided by the Ukrainian authorities.

3. Conviction rates

231. GREVIO notes with satisfaction the efforts made in recent years to train the judiciary on violence against women, including on the offences recently introduced into legislation to enhance compliance with the Istanbul Convention. Despite the increased awareness of the need to combat impunity for violence against women, GREVIO notes with concern that domestic violence is still perceived by some members of the judiciary as a quarrel or a conflict between individuals, with insufficient recognition for the gendered nature and dynamics of power and control in cases of domestic violence. Consequently, incidents of domestic violence that come within the remit of Article 173-2 of the Code of Administrative Offences are often reclassified as minor offences, leading only to a verbal warning and the closing of the case.[232] This course of action does not allow for the cyclical nature of domestic violence to be addressed, violence that is frequently repeated over time with a tendency to escalate, as it prevents prosecution under Article 126-1 of the Criminal Code when the violence is repeated. Against this background, GREVIO welcomes the amendments made in 2024 to the existing legislation aimed at prohibiting the practice of releasing a perpetrator of domestic violence from administrative liability on the grounds of the insignificance of the offence.[233] While too early to evaluate the effect of this legislative change, GREVIO stresses the importance of ensuring adequate criminal liability through effective case building that takes into account the repeated nature of domestic violence.

232. Moreover, GREVIO notes with concern that the sanctions handed down to people convicted of sexual harassment have until now mainly consisted of small fines,[234] which may convey a sense of impunity for this type of violence against women.

233. In cases of rape and sexual violence, legal experts alerted GREVIO to the fact that gender stereotypes and myths about rape and sexual violence that are widespread in society also persist in the judiciary. While the case law has evolved since the adoption of a definition of rape and of sexual violence based on the notion of consent, it appears that significant discrepancies persist in the application of the law and the understanding of the notion of consent, leading to diverging court interpretations. Last, GREVIO notes with concern that, in practice, should the parties decide to enter a reconciliation procedure, the perpetrator's sanctions are often lenient.[235]

234. GREVIO strongly encourages the Ukrainian authorities to take the necessary measures to ensure the adequate handling of all acts of violence against women and domestic violence at the level of the judiciary, including through an appropriate interpretation of consent and an effort to reduce the use of gender stereotypes and limit the influence of such stereotypes on the assessment of the situation, the context and the victim's testimony. They should also ensure the issuance of appropriate sanctions and assess progress made in order to identify possible gaps in the judicial response to violence against women and to ascertain where attrition might occur.

B. Risk assessment and risk management (Article 51)

235. Concern for the victim's safety must lie at the heart of any intervention in cases of all forms of violence covered by the Istanbul Convention. Article 51 thus establishes the obligation to ensure that all relevant authorities, not just law-enforcement authorities, effectively assess and devise a plan to manage the safety risks a victim faces on a case-by-case basis, according to standardised procedures and in co-operation with each other.

232. See the submission by JurFem and by the Women's Perspectives centre: in 2023, about 10% of the cases aimed at holding perpetrators administratively liable for domestic violence were reclassified as "insignificant".
233. Law No. 3733-IX of 22 May 2024, in force since December 2024. See also Article 45, Sanctions and measures.
234. Between €30 and €45. Information obtained during the evaluation visit.
235. See Article 48, Prohibition of mandatory alternative dispute resolution processes or sentencing.

236. GREVIO welcomes the fact that the Ukrainian authorities have introduced systematic risk assessment in situations of domestic violence. Risk assessment is carried out based on a standardised form containing an extensive list of questions covering the main risk factors, including non-fatal strangulation. According to an order from the Ministry of Social Policy and Ministry of Interior, authorised bodies in the field of preventing and combating domestic violence may use the results of risk assessment when applying measures to combat such violence in accordance with the law on domestic violence.[236]

237. However, lawyers and organisations working with women victims have drawn GREVIO's attention to the fact that there is no protocol for the interinstitutional sharing of the outcome of any risk assessment. Moreover, risk assessment is carried out by one entity only, the law-enforcement agencies, and it is unclear to what extent information from other entities, including specialist support services, is incorporated. GREVIO points to the need to ensure that risk management follows any risk assessment and that safety plans are established based on the outcome of risk-assessment procedures, in close co-operation with all the relevant authorities and organisations (police, prosecution, specialist support services, civil society organisations, family and friends, neighbours, etc.) in order to provide both safety and support to the victim. This can be achieved through practices such as multi-agency risk-assessment conferences, where information on a specific person at risk can be shared among relevant authorities and a risk-management plan centred on the needs and resources of the victim is drawn up to protect her and her children from further abuse.[237]

238. Furthermore, risk assessment does not appear to be repeated over time with a view to assessing the dynamic evolution of a risk to a victim. In particular, where repeated incidents of domestic violence come to the attention of the authorities over time and are consequently handled as a criminal offence, there is in most cases no ongoing risk assessment by investigators. Prosecutors and judges consequently work on the basis of an outdated risk assessment.[238] Additionally, GREVIO draws attention to the fact that risk is not a static element and that it is likely to evolve rapidly in situations of domestic violence. It is therefore important to repeat risk-assessment procedures at different stages of the investigation to ensure the safety of victims and avoid them being lulled into a false sense of security.

239. Access to firearms is a very important risk factor in terms of serious violence and gender-related killings or threats of killings, and GREVIO welcomes the fact that the risk-assessment form used by the Ukrainian authorities includes a question on access to weapons. In the current situation of the war of aggression, such a risk is substantially increased by the fact that many men serving in the military carry a firearm.[239] In these circumstances, GREVIO considers it essential that the authorities apply regular risk-assessment procedures, not least to check whether the perpetrator has access to a firearm, and to take systematic measures in this respect, including confiscations and licence suspensions. Last, GREVIO notes with regret that no mechanism to carry out a retrospective analysis of cases of gender-related killings or attempted gender-related killings is in place. It stresses the importance of such mechanisms to prevent future gender-related killings of women and to hold to account both the perpetrator and the multiple agencies that come into contact with the victim.

240. GREVIO notes with concern that risk assessment is carried out only for cases of domestic violence and does not appear to be carried out for other forms of violence against women, such as sexual harassment, sexual violence or forced marriage, nor in the context of any forms of violence that manifest online or through technology, such as threats or harassment.

236. Order No. 369 of 13 March 2019.
237. See GREVIO's baseline evaluation report on the United Kingdom, 2025, paragraph 393.
238. Information obtained during the evaluation visit.
239. Information obtained during the evaluation visit. See also the submission by the Women's Perspectives centre; and Small Arms Survey, "Unsteady ground: gender-responsive small arms control in Ukraine", April 2025 and "From conflict to consequence: nearly half of Ukrainian men would like to own a firearm, or already have one, December 2023.

241. While commending the existence of an exhaustive risk-assessment form, GREVIO strongly encourages the Ukrainian authorities to take steps to improve their practices for all forms of violence against women, including by introducing multi-agency co-operation in risk assessment that is carried out over time, in order to assess the evolving nature of the risk, and that results in risk-management plans implemented by all relevant bodies and institutions.

242. GREVIO also encourages the Ukrainian authorities to consider setting up a system, such as a domestic homicide review mechanism, to analyse all cases of gender-related killings of women, with a view to preventing them in the future and resolving any systemic shortcoming in the risk-assessment process.

C. Emergency barring orders (Article 52)

243. In 2017, emergency barring orders (EBOs) were introduced through the law on domestic violence, which GREVIO welcomes. Such orders may be issued by the police against a perpetrator of domestic violence, "should there exist a direct threat to the victim's life and health in order to stop domestic violence, prevent its continuation or recurrence".[240] An EBO may be requested by the victim or by a police officer and is granted for a duration of 10 days, but appears to require a risk-assessment procedure. According to the data available, the use of EBOs has been on the rise in recent years, with 43 341 EBOs issued in 2020, 49 861 in 20211, 43 341 in 2022 and 98 947 in 2023.[241] Breaches of EBOs or the failure of the perpetrator for whom an EBO was issued to report his new place of residence to the police have been considered since 2024 as administrative offences of domestic violence under Article 173-8 of the Code of Administrative Offences and sanctioned by a fine, community work or an administrative arrest of up to 10 days. Information provided by the authorities indicates that in the first months of 2025, they amounted to 10% of the orders granted.[242]

244. Organisations and lawyers working with women victims of domestic violence have drawn GREVIO's attention to the fact that while the law provides for the eviction of the perpetrator from the place of residence shared with the victim, a ban from re-entering it or a contact ban, most EBOs take the form of a contact ban.[243] Consequently, perpetrators often continue to live together with their victims and only have to abide by the prohibition to talk to them. GREVIO notes with regret that such practices do not effectively ensure the safety of victims and their children and run counter to the effective implementation of Article 52.

245. More alarmingly, it appears that the imposition of an EBO may be interpreted by some judges as a sanction for domestic violence. This means that where cases of administrative proceedings for domestic violence are initiated, no sanctions are imposed on the grounds that a perpetrator cannot be punished twice for the same offence.[244] GREVIO reiterates the protective nature of an emergency barring order and underlines the importance of providing clear guidance to judges and other relevant professionals on the fact that EBOs, as prescribed by Article 52 of the Istanbul Convention, should be imposed to protect the safety of a victim in case of immediate danger, irrespective of the existence of other legal proceedings.[245]

240. Article 25 of the Law on Preventing and Combating Domestic Violence.
241. See the state report for data from 2020 to 2022 and the submission by the Women's Perspectives centre for data for 2023.
242. Information provided by the authorities during the evaluation visit.
243. EBOs consisted in evictions of the perpetrator from the shared domicile in only 27% of the cases in 2021, 28% in 2022 and 25% in 2023. Source: submission by the Women's Perspectives centre.
244. Submission by the Women's Perspectives centre.
245. See Council of Europe, "Emergency barring orders in situations of domestic violence: Article 52 of the Istanbul Convention" (2017).

246. GREVIO strongly encourages the Ukrainian authorities to take the necessary legislative and other measures to ensure that emergency barring orders are implemented in a manner that effectively protects the safety of victims of domestic violence in case of immediate danger by temporarily barring the perpetrator from entering the joint residence with the victim.

D. Restraining or protection orders (Article 53)

247. In addition to emergency barring orders, the 2017 law on domestic violence provides for longer-term restraining orders.[246] These may entail a prohibition on entering the joint residence or contacting the victim, restrictions on communication with the victim's children and a no-go order covering the joint residence, the workplace and any other location entered by the victim. Restraining orders can be issued by a civil judge for six months and may be renewed once. They may be requested by victims, who in these circumstances are exempted from paying court fees, which GREVIO welcomes. Restraining orders should be issued by courts within 72 hours.

248. However, despite the availability of civil law protection orders as required by the Istanbul Convention, GREVIO notes that the number of restraining orders requested and issued remains low compared to the number of recorded cases of domestic violence. For example, in 2024, while 151 716 persons filed a complaint for domestic violence, only 1 436 applications for protection orders were made. Restraining orders were granted in 63% of the applications.[247] Organisations working with women victims of domestic violence have drawn GREVIO's attention to several factors that might prevent victims from requesting restraining orders, including the lack of access to legal aid.[248] Moreover, the 72 hours deadline is not always respected by courts, which limits the effectiveness of the protection granted to the victim and may, in particular, lead to a lack of continuity in the protection offered in the period after the expiry of an emergency barring order and before the issuance of a protection order. [249] It also appears that some courts refuse to grant restraining orders if no charges have been brought against the perpetrator for domestic violence under Article 173-2 of the Code of Administrative Offences.[250]

249. GREVIO notes with concern that courts do not consistently collect data on restraining orders issued in cases of domestic violence. As regards breaches of restraining orders, they can result in administrative and criminal liability for the perpetrator. However, no data are available on sanctions issued for such breaches. Additionally, GREVIO notes with concern that the restraining orders provided for by the Law on Preventing and Combating Domestic Violence and by the Law on Ensuring Equal Rights and Opportunities for Women and Men only protect victims of domestic violence. They do not cover women victims of other forms of gender-based violence, such as sexual harassment or stalking, and do not extend to any behaviour online or violence committed through technology.

250. Last, although the law provides that the children of the victim can benefit from restraining orders, GREVIO notes with concern that this is not often the case in practice due to the failure of law-enforcement officers to identify and record the presence of children exposed to domestic violence.[251]

246. Article 26 of the Law on Preventing and Combating Domestic Violence.
247. National police of Ukraine: Unified register of statements and reports of criminal offences and other events related to domestic violence. In the report on the results of the work of the national police of Ukraine on preventing and combating domestic violence for 12 months of 2024.
248. See Article 57, Legal aid.
249. Submission by JurFem.
250. Ibid.
251. See also Article 26, Protection and support for child witnesses, and Article 50, Immediate response, prevention and protection.

251. GREVIO urges the Ukrainian authorities to take steps to increase the use of restraining and protection orders for women victims of all forms of violence covered by the Istanbul Convention. To do so, they should:

- **a. provide clear guidance to the judiciary about the aims and use of restraining orders;**
- **b. ensure that restraining orders are available and accessible to victims of all forms of violence against women covered by the Istanbul Convention and to children exposed to domestic violence;**
- **c. collect data on the number of restraining orders issued, the number of violations and the sanctions imposed as a result of such breaches.**

E. *Ex parte* and *ex officio* proceedings (Article 55)

1. *Ex parte* and *ex officio* proceedings

252. Article 55, paragraph 1, of the Istanbul Convention places on parties the obligation to ensure that investigations into a number of categories of offences shall not be wholly dependent upon the report or complaint filed by a victim and that any proceedings underway may continue even after the victim has withdrawn her statement of complaint.

253. GREVIO notes with concern that although Ukraine has not entered a reservation to Article 55, paragraph 1, of the convention, several of the offences that should be prosecuted *ex officio* may only be prosecuted upon a victim's complaint. This is the case for domestic violence when prosecuted under Article 126-1 of the Criminal Code, forced abortion and forced sterilisation and forced marriage. Moreover, rape without aggravating circumstances and sexual violence and coercion to a sexual act with a third person (Articles 152 and 153 of the Criminal Code) are only prosecuted upon a victim's complaint, while all other forms of sexual violence enshrined in the Criminal Code are prosecuted *ex officio*. The onus is therefore on the victim to initiate proceedings. This situation is likely to deter victims from reporting rape and sexual violence, can lead to over-reliance of the law-enforcement authorities on the victim's testimony and send the message that some forms of rape or sexual violence are less serious than others. GREVIO highlights that the aim of Article 55, paragraph 1, of the convention is to take into account the particularly traumatising nature of the offences for which the convention prescribes *ex officio* proceedings and to enable criminal investigations and proceedings to be carried out without placing the onus on the victim to initiate such proceedings and secure convictions.[252] In this context, GREVIO notes that offences associated with domestic violence can still be prosecuted if the victim withdraws her complaint. GREVIO notes that a bill has been pending before the parliament since 2024 to amend the Code of Criminal Procedure and it appears that it will make it possible to continue proceedings even if the victim withdraws her statement for the offences of rape without aggravating circumstance, sexual violence and coercion to a sexual act, domestic violence, forced abortion and sterilisation, and forced marriage.[253] GREVIO stresses the importance of improving compliance of the Ukrainian legislation with Article 55, paragraph 1, of the Istanbul Convention to reinforce the effectiveness of the judicial response to violence against women and combat impunity.

254. GREVIO urges the Ukrainian authorities to take the legislative measures required to improve the compliance of Ukrainian legislation with Article 55, paragraph 1, of the Istanbul Convention and allow for *ex officio* prosecution of offences established in accordance with Articles 35 to 39 of the convention.

252. See the Explanatory Report to the Istanbul Convention, paragraph 279.
253. Draft law No. 12297 of 9 December 2024.

2. Victim support in legal proceedings

255. With a view to empowering victims and to encouraging them to go through with criminal proceedings, paragraph 2 of Article 55 requires parties to ensure that victims' organisations, specifically trained domestic violence counsellors or other types of support/advocacy services may assist and support victims during investigations and judicial proceedings.

256. Ukrainian legislation does not provide for the possibility for victims' support organisations and counsellors to assist women victims of violence during judicial proceedings, beyond the services provided by the free legal aid centres. The support of psychologists can be provided by local social services. However, the latter often lack funds to cover such expenses.

257. GREVIO strongly encourages the Ukrainian authorities to take steps to ensure that women victims of violence and their children receive the necessary support throughout court proceedings, to minimise the risks of secondary victimisation while fully supporting their empowerment.

F. Measures of protection (Article 56)

258. GREVIO welcomes the fact that Ukrainian legislation provides for measures to protect victims from secondary victimisation in legal proceedings. These include the possibility to hold court hearings with the remote participation of the perpetrator to avoid physical confrontation, the possibility of holding such proceedings in camera and of recording statements of victims so as to avoid repeat testimonies. Confidentiality concerning the victim's address can also be safeguarded. However, information brought to GREVIO's attention indicates that the application of these procedural safeguards is inconsistent across the country and that women victims of violence remain exposed to high levels of secondary victimisation, including repeated interviews, intrusive questions, victim-blaming and the lack of a trauma-informed and gender-sensitive approach.[254]

259. In this context, GREVIO notes with satisfaction that practices aimed at avoiding secondary victimisation of women victims of violence and at carrying out sensitive, trauma-informed proceedings are being formalised as guidance for the attention of prosecutors. It also expects that the experience gained in cases of conflict-related sexual violence of adopting victim-centred and trauma-informed practices will be mainstreamed and applied more widely to victims of other forms of violence against women.[255]

260. Regarding the protection of children, GREVIO welcomes the ongoing setting up of Barnahus centres in Ukraine, in which children victims of sexual violence can receive comprehensive support in the form of a one-stop shop.[256] Moreover, in 2024, standards were approved for prosecutors' work in criminal proceedings involving children. They require, among other things, that children be interviewed in child-friendly interview rooms with mandatory video recording and the presence of a psychologist, prompt pre-trial investigations and priority court proceedings and co-operation with all relevant child-protection sectors in order to ensure a comprehensive approach to such cases. GREVIO points to the importance of making these services accessible to children exposed to domestic violence by one parent against the other, for example when being interviewed in the context of child custody procedures.

254. Information obtained during the evaluation visit.
255. See Article 50, Immediate response, prevention and protection.
256. Since 2024, the work of the Barnahus centres is regulated in law. Five regional child protection centres operating under the government strategic plan "Bring children back UA" have been set up in in Kyiv, Dnipro, Lutsk, Rivne, and Kharkiv, providing comprehensive assistance and support to children who have suffered from or witnessed violence in various regions of Ukraine. Moreover, 13 Barnahus centres are currently operating, under the leadership of Health Rights International and with the support of UNICEF.

261. GREVIO invites the Ukrainian authorities to step up efforts to protect the rights and interests of women victims of all forms of violence covered by the Istanbul Convention and children exposed to such violence in order to prevent secondary victimisation throughout legal proceedings. To do so, they should take measures to ensure that law-enforcement officers and the judiciary effectively and consistently make use of existing safeguards.

G. Legal aid (Article 57)

262. Ukraine has a widespread network of free legal aid centres, with 477 such centres across the country.[257] Free legal aid can in principle be provided to remedy rights violations. It can be granted up to six times a year. Free legal aid centres can provide both primary legal (information and advice, drafting of complaints, assistance in securing access to secondary legal aid and mediation) and secondary legal aid (defence, representation in court and before other state bodies, drafting of legal documents). Free primary legal aid is granted to all persons under the jurisdiction of Ukraine while free secondary legal aid is granted to persons with low income and to people with disabilities, to children aged 14 and older, to IDPs, to war veterans and, since 2018, to women victims of domestic and gender-based violence.[258] GREVIO notes with concern that while victims of conflict-related sexual violence are entitled to free legal aid, this is not the case for victims of rape committed outside the context of the war or of intimate partner relationships.

263. However, information brought to GREVIO's attention highlights that only a small proportion of women victims of violence make use of free legal aid. It is estimated that only about 1% of victims that report domestic violence to the police apply for free legal aid.[259] Access to legal aid remains nonetheless crucial for women victims of violence, in particular to request protection orders and, for victims of conflict-related sexual violence, to initiate steps to obtain compensation.

264. Several factors may explain this low use of free legal aid by women victims of violence: a lack of information on existing possibilities, a lack of effective referral to free legal aid centres by the police and social workers, and a widespread lack of trust in state institutions and reluctance to undertake legal proceedings for fear of reprisals and/or secondary victimisation. GREVIO understands that many women victims of violence, including of conflict-related sexual violence, prefer to turn to NGOs for support and legal advice. Moreover, GREVIO notes with concern allegations indicating that some victims have had their application for free legal aid turned down due to a narrow interpretation of the legal services to be provided by the legal aid centres and a lack of specific training on violence against women among some lawyers working for the centres. Against this background, GREVIO notes that the Ukrainian authorities are aware of the need to enhance the access of women victims of violence to the free legal aid services they are entitled to and have taken steps in this direction, such as the launch of information campaigns and the training of legal aid professionals employed by the centres on issues such as the specific needs of IDPs and of victims of conflict-related sexual violence. GREVIO highlights the importance of removing obstacles for women victims of violence to access free legal aid in order to ease their access to justice and to effective protection measures. This is also an important means of support for victims of conflict-related sexual violence to obtain redress and ensure accountability.

265. While welcoming the availability of free legal aid through the extensive network of free legal aid centres, GREVIO encourages the Ukrainian authorities to step up efforts to identify and remove any obstacles for victims of all forms of violence against women covered by the Istanbul Convention to access free legal aid.

257. As of 2025, around 70 legal aid centres were not operational due to the war of aggression by the Russian Federation.
258. For most categories of persons entitled to free secondary legal aid, the eligibility for such aid depends on the person's legal status, whereas for low-income persons and persons with disabilities, an income-based criterion applies. For certain categories of recipients of free secondary legal aid, a limitation of up to six grants per budget period applies.
259. See the submission by the Women's Perspectives centre.

VII. Migration and asylum

266. In the area of migration and asylum, the main requirement of the Istanbul Convention is to ensure that residence status laws and asylum procedures do not turn a blind eye to the realities of women living in abusive relationships or women subjected to sexual violence and exploitation and other forms of gender-based violence. Residence status laws shall provide for the possibility of obtaining autonomous residence permits for women in specific circumstances (Article 59). Asylum procedures, on the other hand, must be gender-sensitive and allow women to disclose their stories in full, and grounds for persecution shall be interpreted in a gender-sensitive manner. This can only be achieved if, in turn, reception procedures and support services for asylum seekers are sensitive to the needs of women victims or those at risk of violence (Article 60).

267. The war of aggression by the Russian Federation has caused an outflow of refugees from Ukraine itself, and the number of migrants and asylum seekers arriving in Ukraine significantly decreased as a result of this war. While migration to Ukraine still takes place, the current situation in Ukraine does not offer enough information to allow for a thorough evaluation of the measures taken by the Ukrainian authorities in the field of migration and asylum and their implementation in practice. GREVIO's findings under this chapter therefore focus on the examination of the compatibility of the legislation in force with Articles 59, 60 and 61 of the convention.

A. Residence status (Article 59)

268. Article 59 of the Istanbul Convention includes provisions that seek to reduce the dependency of women victims of violence on their perpetrators by offering access to an autonomous residence permit. The Ukrainian laws on immigration and on the legal status of foreigners and stateless persons do not contain any specific provisions addressing the status of women victims of gender-based violence. Therefore, GREVIO notes with concern that there is at the moment no possibility for women victims of violence to apply for an independent residence permit in case of separation from an abusive partner/spouse; no specific measures to avoid a situation where the deportation of the abusive partner/spouse also results in the deportation of the victim; and no recourse for women and girl victims of forced marriage abroad to regain their residence permit in Ukraine. Moreover, GREVIO is not aware of any guidance for the migration authorities on how to deal with such circumstances. GREVIO wishes to highlight the fact that fear of deportation or loss of residence status is a powerful tool used by perpetrators to prevent victims of violence against women and domestic violence from seeking help or from separating from the perpetrator. It is therefore essential to ensure that the risk of losing their residence status does not constitute an impediment to victims leaving an abusive and violent marriage or relationship.[260] In this regard, GREVIO also draws attention of the Ukrainian authorities to the Council of Europe Committee of Ministers recommendation on the rights of migrant, refugee and asylum-seeking women and girls and to the practical guide to support the implementation of this recommendation.[261]

269. GREVIO strongly encourages the Ukrainian authorities to take the necessary legislative and other measures to ensure conformity of Ukrainian legislation with Article 59 of the Istanbul Convention, notably by ensuring that migrant women victims whose residence status depends on that of their spouse have access to an autonomous residence permit in order to be able to leave an abusive relationship.

260. Explanatory Report to the Istanbul Convention, paragraphs 301-309.
261. Committee of Ministers' Recommendation CM/Rec(2022)17 and Practical guide for public authorities to support the implementation of the Council of Europe Recommendation on protecting the rights of migrant, refugee and asylum-seeking women and girls, Strasbourg, 2025.

B. Gender-based asylum claims (Article 60)

1. Gender-sensitive asylum determination procedure

270. Before the war of aggression, Ukraine had been both a transit and a destination country for people seeking international protection. In 2021, about 5 000 refugees and asylum seekers were recorded, many of them coming from Afghanistan but also from Syria, Somalia, Iraq and the Russian Federation.[262] About one third of asylum seekers present in Ukraine in 2021 have reportedly left the country since the beginning of the war.[263] Others are likely to still be present in Ukraine. Very few claims for international protection are currently being processed in Ukraine. They originate mainly from persons coming from the Russian Federation and Tajikistan.[264] Access to the asylum procedure has been, and reportedly remains, difficult.[265]

271. Gender-based violence is not explicitly recognised as a form of persecution giving rise to international protection under Ukrainian law. Moreover, no specific procedure to screen for vulnerabilities among persons seeking international protection seems to exist.[266] GREVIO highlights the importance of acknowledging gender-based violence as a form of persecution in order to give a possibility to women having experienced gender-based violence to seek international protection on this ground and to ensure a gender-sensitive interpretation of the grounds for requesting and granting refugee status as defined by the 1951 Convention relating to the Status of Refugees (the Geneva Convention), which Ukraine acceded to in 2002. It draws attention to the fact that adopting a gender-sensitive interpretation of the Geneva Convention implies recognising and understanding how gender can have an impact on the reasons behind the types of persecution or harm suffered.[267]

2. Accommodation

272 In Ukraine, asylum seekers are accommodated in temporary accommodation centres that do not, however, seem to offer procedures for vulnerability screening or any other measures to address special protection needs, including of women victims of gender-based violence.[268] Moreover, persons who have expressed their intention to seek protection in Ukraine but whose formal refugee procedure has not yet been initiated cannot be accommodated in temporary accommodation centres, which renders them vulnerable to homelessness, violence, including gender-based violence, and exploitation. [269]

273. As regards access to specialist support services for women asylum seekers for experiences of gender-based violence, whether en route to or while in Ukraine, it is unclear to what extent this is facilitated through the temporary accommodation centres, or whether the status of these women as asylum seekers allows for this.

262. Source: UNHCR, quoted in HIAS and Right to Protection, asylum seekers and refugees in Ukraine, addressing protection risks during wartime, April 2023.
263. Ibid.
264. See the Asylum Information Database (AIDA), country report on Ukraine, available at https://ecre.org/aida-country-report-on-ukraine-update-on-2025/
265. HIAS and Right to Protection, asylum seekers and refugees in Ukraine, addressing protection risks during wartime, 2023.
266. Ibid.
267. Explanatory Report to the Istanbul Convention, paragraph 312. See also UNHCR, Handbook and guidelines on procedures and criteria for determining refugee status (RSD), gender-related persecution within the context of Article 1A(2) of the 1951 Convention and/or its 1967 Protocol relating to the Status of Refugees, 2011.
268. AIDA, country report on Ukraine.
269. Right to Protection: alternative report to the committee on the elimination of racial discrimination (CERD), review of the periodic report of Ukraine, the right to protection, 2025.

274. GREVIO urges the Ukrainian authorities to take the necessary legislative and other measures to comply with the requirements of Article 60 of the Istanbul Convention, notably by ensuring a gender-sensitive interpretation of the grounds for requesting and granting refugee status and asylum, by introducing vulnerability screening to ensure adequate protection for women victims of gender-based violence or for those at risk thereof in any accommodation provided, as well as by ensuring their access to specialist support services.

Concluding remarks

275. GREVIO welcomes the strong commitment to preventing and combating violence against women demonstrated by the Ukrainian authorities by ratifying the Istanbul Convention in 2022, during the war of aggression by the Russian Federation. This step was preceded by many measures taken to align Ukrainian legislation and practice with the requirements of the Istanbul Convention, taken as early as 2017. Several of these measures have focused on the area of domestic violence, seeking to encourage greater recognition among professionals of the state's responsibility to address it and garnering more generally an understanding of domestic violence as a public rather than a private matter among society at large.

276. Ukraine's journey towards greater compliance with the many provisions of the Istanbul Convention has continued systematically since then, resulting in innovation in some areas but also exposing the need for greater alignment in others. An example of innovative practical approaches in ensuring support and protection for victims of domestic violence across the country is the introduction of multi-agency mobile support teams. Composed of various professionals, including psychologists, social workers and healthcare workers, their aim is to provide support and protection to those in need, including in rural areas and those with restrictions on mobility. Another example of promising developments is the setting up of a national training centre for a gender-based violence response. The war of aggression against Ukraine by the Russian Federation has placed considerable strains on the ability of the Ukrainian authorities to provide effective responses to the many forms of violence against women covered by the Istanbul Convention. It has also brought into sharp relief the need for robust measures to ensure the safety of women and girls, as well as all other members of society, from conflict-related sexual violence – and from forms of violence such as domestic violence that manifest differently or more profoundly during times of conflict.

277. While identifying room for improvement in many areas, including in the criminal justice system, the report attests to the Ukrainian authorities' commendable willingness – despite the difficult circumstances and the significant limits on financial and human resources – to sustain support services for victims and the adequate functioning of the judicial system in order to hold perpetrators to account. This includes the inspiring efforts made to ensure state-of-the-art technical and legal skills among forensic experts and prosecution services for the effective prosecution of conflict-related sexual violence. It extends to the comprehensive efforts made to ensure that the Ukrainian military offers sufficient protection from and reporting channels for incidents of gender-based violence against its female personnel and the awareness demonstrated by the authorities of the war's impact on the frequency and severity with which women experience domestic violence, including at the hands of military personnel. GREVIO recognises the impact of the trauma resulting from the war on Ukrainian society and the widespread need for psychological support, coupled with very basic humanitarian needs that are to be met among those internally displaced or living close to the frontlines. The report emphasises the strong co-operation between state sectors in Ukraine and women's rights organisations and civil society more generally to meet these needs, and it highlights the determination visible among the Ukrainian authorities to learn from international partners and benefit from promising practices and innovation tried and tested elsewhere in order to improve their national responses to the forms of violence against women covered by the Istanbul Convention.

278. With the present report, GREVIO wishes to support the Ukrainian authorities in this endeavour and invites them to keep it regularly informed of developments with regard to the implementation of the Istanbul Convention. GREVIO looks forward to continuing its fruitful co-operation with the Ukrainian authorities.

279. With a view to facilitating the implementation of its suggestions and proposals, GREVIO requests the national authorities to translate this report into their official national language(s) and to ensure that it is widely disseminated, not only to the relevant state institutions at all levels (national, regional and local), in particular to the government, the ministries and the judiciary, but also to NGOs and other civil society organisations that work in the field of violence against women.

Appendix I
List of proposals and suggestions by GREVIO

I. Purposes, definitions, equality and non-discrimination, general obligations

B. Scope of application of the convention and definitions (Articles 2 and 3)

1. While commending the Ukrainian authorities' efforts to adopt definitions in line with the Istanbul Convention, GREVIO strongly encourages them to take further steps to ensure that existing definitions are fully aligned with those of the Istanbul Convention, to simplify the existing legal framework on domestic violence to ensure greater clarity and to pursue efforts to develop a common recognition and understanding, based on existing definitions, of the phenomenon of violence against women as a form of gender-based violence. (paragraph 11)

C. Fundamental rights, equality and non-discrimination (Article 4)

2. Intersectional discrimination

2. While welcoming the measures taken by the Ukrainian authorities to anchor measures to prevent and combat violence against women in policies on gender equality, GREVIO encourages them to strengthen their efforts to implement measures to prevent and combat violence against all women, to include the perspectives and needs of groups of women exposed to intersectional discrimination, and to provide them with appropriate protection and support. (paragraph 17)

E. Gender-sensitive policies (Article 6)

3. GREVIO strongly encourages the Ukrainian authorities to take measures to reinforce the gender perspective in all the measures taken to implement the Istanbul Convention. This gender-sensitive approach should be based on an understanding of the link between violence against women, gender stereotypes and the structural inequalities between women and men, in order both to address the specific needs of women victims and to raise awareness of professionals and the general population and to counteract the negative stereotypes against women that legitimise and sustain violence against them. (paragraph 21)

II. Integrated policies and data collection

A. Comprehensive and co-ordinated policies (Article 7)

4. While welcoming the co-operation mechanism and the existing strategic policy documents on violence against women and while fully acknowledging the constraints resulting from the war of aggression by the Russian Federation, GREVIO strongly encourages the Ukrainian authorities to:

a. reinforce existing measures for the Istanbul Convention's consistent implementation throughout the country;
b. ensure that policies and programmes address all forms of violence against women covered by the Istanbul Convention, including in particular sexual violence committed outside of the context of the war and violence against women committed in the digital sphere. (paragraph 30)

5. Moreover, GREVIO strongly encourages the Ukrainian authorities to take measures to ensure that, in the provision of humanitarian assistance, due attention is paid to preventing violence against women and girls and to protecting them from violence. (paragraph 31)

B. Financial resources (Article 8)

6. While acknowledging the immense challenges resulting from the war of aggression in terms of funding priorities, GREVIO encourages the Ukrainian authorities to take steps to ensure the sustainability of the financial resources allocated to measures and policies for preventing and combating violence against women, including in particular to women's rights organisations that run specialist support services for women victims of all forms of violence, with a view to:

a. ensuring that organisations providing specialist services to women victims of violence have access to suitable funding opportunities, for example through long-term grants based on transparent procurement procedures, in order to ensure continuity of care and preserve existing expertise;
b. taking steps to identify more effectively the sums spent on preventing and combating violence against women by all relevant national and local institutions and ensure the adequate availability of funding across the country. (paragraph 36)

C. Non-governmental organisations and civil society (Article 9)

7. GREVIO encourages the Ukrainian authorities to ensure that the recognition of the essential role played by civil society and specialist women's rights organisations in preventing and combating violence against women, including conflict-related sexual violence, is translated into effective and consistent co-operation across all regions and territories. (paragraph 41)

D. Co-ordinating body (Article 10)

8. Mindful of the context for implementation of the Istanbul Convention, which is marked by the war of aggression by the Russian Federation, GREVIO strongly encourages the Ukrainian authorities to take measures to enhance the co-ordination, implementation, monitoring and evaluation of policies and measures with regard to violence against women, in particular by:

a. allocating, as far as possible, the necessary human and financial resources for these functions;
b. setting up or designating an independent body to monitor and evaluate, on a regular basis, national policies and measures for preventing and combating violence against women and domestic violence, by co-ordinating the collection of robust data on the basis of comparable indicators covering the whole country, in close consultation with civil society and women's rights organisations. (paragraph 46)

E. Data collection and research (Article 11)

1. Administrative data collection

9. GREVIO strongly encourages the Ukrainian authorities to pursue efforts to develop a system of administrative data collection on all forms of violence covered by the Istanbul Convention in order to allow for evidence-based policy making. In doing so, they should:

a. ensure that data collected by all relevant stakeholders (namely law-enforcement agencies, judicial authorities and healthcare facilities and social services) are disaggregated with regard to the sex and age of the victim and the perpetrator, their

relationship, geographical location and the different forms of violence covered by the Istanbul Convention, and that information on the presence of children exposed to domestic violence is also included;

b. harmonise data collection between law-enforcement agencies and the judiciary with the aim of, inter alia, allowing the assessment of conviction and attrition rates and of recidivism rates and enabling a thorough analysis of the pathway of cases through the criminal justice system chain – from initial contact with law enforcement through prosecutors' offices and finally to the courts;
c. introduce a data-collection system that allows the recording of the registration and outcomes of asylum claims made on the basis of gender-related persecution;
d. ensure that the process of collecting, storing and transforming collected data complies with standards on personal data protection, as stipulated in the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data. (paragraph 55)

2. Population-based surveys

10. GREVIO encourages the Ukrainian authorities to regularly conduct population-based surveys on all forms of violence against women covered by the scope of the Istanbul Convention. (paragraph 57)

3. Research

11. GREVIO encourages the Ukrainian authorities to conduct, commission and support research, including quantitative and qualitative studies, on the different forms of violence against women, addressing also the experiences of women exposed to intersectional discrimination, such as women with disabilities, migrant women, women from national or ethnic minorities, women who are IDPs and LBTI women. (paragraph 60)

III. Prevention

A. General obligations (Article 12)

12. GREVIO strongly encourages the Ukrainian authorities to strengthen the primary prevention of all forms of violence against women by stepping up their efforts to eradicate gender stereotypes and attitudes that condone or accept such violence. This should be done with a view to involving men and boys in these efforts and on the basis of the measures set out in Council of Europe Recommendation CM/Rec(2019)1 of the Committee of Ministers to member States on preventing and combating sexism. (paragraph 66)

B. Awareness raising (Article 13)

13. GREVIO strongly encourages the Ukrainian authorities to carry out, on a regular basis, campaigns to increase awareness among the population of the different manifestations of all forms of violence covered by the Istanbul Convention, beyond domestic violence, in co-operation with women's rights organisations. These campaigns should address underlying patriarchal and stereotypical attitudes towards women, portray a gendered understanding of violence against women and highlight the need for the accountability of perpetrators. They should also aim to reduce the stigma experienced by women victims of violence, including stigma around conflict-related sexual violence and the increasing levels of domestic violence by family members who have experienced war-related trauma, including active military personnel or war veterans. (paragraph 71)

14. Moreover, GREVIO encourages the Ukrainian authorities to take all possible measures to raise awareness of violence against women among men serving in the military. (paragraph 72)

C. Education (Article 14)

15. While welcoming measures taken to eliminate gender stereotypes and prejudices in education, GREVIO strongly encourages the Ukrainian authorities to strengthen efforts to ensure the teaching of the elements listed in Article 14 of the Istanbul Convention, including on the various forms of gender-based violence against women and girls. (paragraph 80)

D. Training of professionals (Article 15)

16. GREVIO encourages the Ukrainian authorities to take additional steps to ensure that all professionals working with victims or perpetrators of all forms of violence covered by the Istanbul Convention, in particular the judiciary, receive systematic and mandatory initial and in-service training to identify and respond to all forms of violence covered by the Istanbul Convention. To this end, the Ukrainian authorities should, in particular:

a. ensure that the training provided covers issues such as gender stereotypes; the difference between conflict and violence; the identification of victims; the rights and needs of victims; the prevention of secondary victimisation; victim-centred co-operation among all professionals; the content and objectives of perpetrator programmes; the impact of violence on children exposed to it; and violence against women exposed to intersectional discrimination;
b. ensure that follow-up is provided to initial training, including that delivered by NGOs;
c. evaluate the impact of training programmes on different professional groups. (paragraph 93)

E. Preventive intervention and treatment programmes (Article 16)

1. Programmes for perpetrators of domestic violence

17. GREVIO strongly encourages the Ukrainian authorities to:

a. pursue efforts to increase the quality of perpetrator programmes by developing a common methodology and minimum standards for work with perpetrators, in line with the Istanbul Convention and on the basis of the European standards for perpetrator programmes. They should include a gender-sensitive approach, the deconstruction of gender stereotypes and address the responsibility of perpetrators for their behaviour;
b. strengthen the capacity of perpetrator programmes and roll them out throughout the country;
c. take measures to increase the level of attendance and the rate of completion of perpetrator programmes;
d. take the necessary steps to ensure specific training of the professionals working in perpetrator programmes;
e. embed systematic risk-assessment procedures in work with perpetrators of domestic violence in order to ensure the safety of the victims and their children;
f. ensure systematic evaluation of the programmes' effectiveness and absence of adverse effects. (paragraph 100)

18. Moreover, GREVIO urges the Ukrainian authorities to design and implement targeted programmes for perpetrators of domestic violence by military personnel and war veterans as part of a co-ordinated strategy for its prevention. (paragraph 101)

2. Programmes for perpetrators of sexual violence

19. GREVIO strongly encourages the Ukrainian authorities to take steps to comply with the requirements of Article 16, paragraph 2, of the Istanbul Convention concerning the establishment of treatment programmes for perpetrators of sexual violence, taking due account of best practices developed internationally and guaranteeing a human rights-based approach. (paragraph 103)

F. Participation of the private sector and the media (Article 17)

20. Bearing in mind the important role of the media in promoting equality between women and men and reducing the level of social acceptance of violence against women, GREVIO encourages the Ukrainian authorities to continue to promote the development of specific standards of self-regulation for a balanced, non-sexist and non-sensationalist coverage of violence against women. (paragraph 110)

21. GREVIO encourages the Ukrainian authorities to ensure that women victims of violence and harassment at work are adequately supported and to evaluate the implementation of the new legal framework by collecting data on the number of women victims of sexual harassment at work, the complaints filed by the victims and their outcome. (paragraph 111)

IV. Protection and support

A. General obligations (Article 18)

22. GREVIO strongly encourages the Ukrainian authorities to take measures to step up the co-ordination of responses and enhance networking among existing resources to cater more efficiently to the needs of women victims of all forms of violence covered by the Istanbul Convention, including by ensuring more effective use is made of referral protocols and by mapping existing services at the local level. (paragraph 117)

B. Information (Article 19)

23. GREVIO strongly encourages the Ukrainian authorities to disseminate comprehensive and easily accessible information about existing support services, specialist and general, that are available to women victims of violence across Ukraine. (paragraph 119)

C. General support services (Article 20)

2. Healthcare services

24. While welcoming the measures taken to improve the response of the healthcare system to women victims of violence, GREVIO strongly encourages the Ukrainian authorities to take further measures to ensure the availability of clear and updated protocols on the detection, care and referral of women victims of all forms of violence. (paragraph 126)

25. Furthermore, GREVIO encourages the Ukrainian authorities to increase the ability of the healthcare sector to ensure forensic documentation in relation to the different forms of violence against women covered by the Istanbul Convention. (paragraph 127)

D. Specialist support services (Article 22)

26. While commending the measures taken to enhance the availability of specialist support services, GREVIO strongly encourages the Ukrainian authorities to:

a. safeguard access to specialist support services by investing in an adequate geographical distribution and ensuring their long-term sustainability;
b. evaluate and integrate promising practices and pilot projects into the state-funded network of specialist services. (paragraph 132)

E. Shelters (Article 23)

27. GREVIO strongly encourages the Ukrainian authorities to identify and address, as far as possible, the factors hindering women's access to shelters and to remove any unnecessary access requirements. (paragraph 137)

28. GREVIO encourages the Ukrainian authorities to take further measures to ensure the availability of a sufficient number of shelter places for women victims of violence and their children. In doing so, they should in particular:

a. ensure an even geographical distribution of shelters across the country;
b. implement funding schemes that make it possible to pool resources, based on existing positive practices. (paragraph 138)

G. Support for victims of sexual violence (Article 25)

29. GREVIO strongly encourages the Ukrainian authorities to:

a. set up specialist support services for women victims of sexual violence, making use of existing useful practices and experience at national level and drawing inspiration from positive practices at international level;
b. ensure that such services provide immediate medical care, victim-sensitive forensic examinations and short-term and long-term trauma-informed psychological assistance by qualified professionals, in line with the standards set by the Istanbul Convention;
c. ensure that a victim's access to such support services is not conditional on her willingness to lodge a complaint. (paragraph 144)

H. Protection and support for child witnesses (Article 26)

30. GREVIO urges the Ukrainian authorities to ensure that children exposed to domestic violence are systematically recognised by the authorities and all relevant professionals as victims and afforded the protection and rights they are entitled to by law. (paragraph 149)

31. Moreover, GREVIO strongly encourages the Ukrainian authorities to take measures to improve the access of children exposed to domestic violence to adequate counselling and psychological support. (paragraph 150)

I. Reporting by professionals (Article 28)

32. GREVIO encourages the Ukrainian authorities to ensure that the duty to report imposed on professionals is tempered by full and sensitive information being provided to the victim to allow her to make an informed decision herself and maintain autonomy, while also ensuring the safety of all, especially children. (paragraph 154)

V. Substantive law

A. Civil law

1. Civil remedies against the state – ensuring due diligence (Article 29)

33. GREVIO encourages the Ukrainian authorities to ensure that existing legal remedies against state authorities for failures to prevent or respond to violence against women are accessible and effective in practice, including through improved information and monitoring of their use and outcomes. Progress in this area should be measured by collecting data on the number of civil lawsuits initiated, their outcomes and the damages awarded to victims. (paragraph 159)

2. Compensation (Article 30)

34. GREVIO encourages the Ukrainian authorities to take further measures to ensure that victims of all forms of violence covered by the Istanbul Convention, including conflict-related sexual violence, are systematically informed of their right to claim compensation and of the procedures to be followed and that they are provided with adequate support to do so. (paragraph 165)

3. Custody, visitation rights and safety (Article 31)

35. GREVIO urges the Ukrainian authorities to take the necessary measures to ensure that when determining custody and visitation rights and introducing measures affecting the exercise of parental authority, the competent authorities are required to take into account all incidents of violence against women and domestic violence. To this end, the Ukrainian authorities should:

a. base policies and practices on the recognition that, in a context of domestic violence, joint parenting may be a means for the perpetrator to continue to maintain control and domination over the mother and her children;
b. regulate co-operation between courts through legislative measures or directives so as to ensure that the authorities taking decisions on custody and visitation rights systematically take account of incidents of domestic violence;
c. carry out a thorough review of the judicial practice regarding the legal provisions requiring judges to withdraw custody and visitation rights in cases of parental separation with a history of violence, in order to determine whether the current practice complies with the provisions of Article 31 of the Istanbul Convention;
d. set up supervised visitation facilities, focusing on the safety of children and their mothers, staffed with trained professionals and operating on the basis of clear rules and protocols;
e. encourage appropriate training and the preparation of professional guidelines alerting the relevant professionals to the harmful effects of violence on children, including child witnesses, and familiarising them with the provisions of the Istanbul Convention on custody and visitation rights. (paragraph 172)

36. Moreover, GREVIO urges the Ukrainian authorities to take resolute measures to investigate all allegations of incidents amounting to the abduction of children in situations of separation with a history of domestic violence. (paragraph 173)

B. Criminal law

1. Psychological violence (Article 33) and Physical violence (Article 35)

37. GREVIO encourages the Ukrainian authorities to ensure that acts of psychological violence, including single or isolated acts and those committed in the digital sphere, are criminalised. (paragraph 178)

38. GREVIO strongly encourages the Ukrainian authorities to ensure criminal liability for the intentional conduct of physical violence in the context of domestic violence. (paragraph 179)

2. Stalking (Article 34)

39. GREVIO strongly encourages the Ukrainian authorities to criminalise the intentional conduct of stalking as defined in Article 34 of the Istanbul Convention, including by considering establishing a specific offence, to enable incidents of online and offline stalking to be investigated, prosecuted and punished effectively. (paragraph 182)

3. Sexual violence, including rape (Article 36)

40. GREVIO urges the Ukrainian authorities to take steps to ensure that the definition of sexual violence in the Criminal Code fully complies with Article 36 of the Istanbul Convention. (paragraph 189)

41. GREVIO strongly encourages the Ukrainian authorities:

a. to take steps to further improve the legislation governing offences of sexual violence with a view to removing the remaining barriers that limit the effectiveness of the definition of rape based on the notion of freely given consent;
b. to ensure sufficient time to initiate and complete legal proceedings in cases of rape. (paragraph 190)

5. Female genital mutilation (Article 38)

42. GREVIO strongly encourages the Ukrainian authorities to take additional measures, including legislative ones, in order to ensure that the offence of female genital mutilation is fully aligned with Article 38 of the Istanbul Convention and with the convention's aim to prosecute and punish this offence and to support and protect victims. (paragraph 194)

6. Forced abortion and forced sterilisation (Article 39)

43. GREVIO strongly encourages the Ukrainian authorities to take measures to amend the Criminal Code to cover the intentional conduct of performing surgery that has the purpose or effect of terminating a woman's capacity to naturally reproduce without her prior and informed consent or understanding of the procedure. (paragraph 197)

7. Sexual harassment (Article 40)

44. GREVIO welcomes the steps taken by the Ukrainian authorities to introduce a specific offence of sexual harassment and encourages them to take additional steps to ensure that the definition of sexual harassment fully aligns with Article 40 of the Istanbul Convention. (paragraph 201)

9. Sanctions and measures (Article 45)

45. GREVIO urges the Ukrainian authorities to ensure that sentences and measures imposed for offences of domestic violence and other forms of violence against women covered by the scope of the Istanbul Convention are effective, proportionate and dissuasive, including where appropriate, sentences involving the deprivation of liberty. Pending changes to the legislative framework, the Ukrainian authorities should ensure that sanctions imposed under the Code of Administrative Offences are effective, dissuasive and proportionate. (paragraph 206)

10. Aggravating circumstances (Article 46)

46. GREVIO strongly encourages the Ukrainian authorities to take measures to ensure that all circumstances listed in Article 46 of the Istanbul Convention may be taken into consideration as aggravating circumstances for all forms of violence covered by the Istanbul Convention and that they are effectively applied by the judiciary. (paragraph 209)

11. Prohibition of mandatory alternative dispute resolution processes or sentencing (Article 48)

47. GREVIO urges the Ukrainian authorities to take legislative and any other steps to ensure that in criminal proceedings alternative dispute resolutions processes do not constitute quasi-mandatory mediation in cases with a history of domestic violence and that they are not imposed on women victims of any form of violence against women. (paragraph 215)

48. While welcoming measures to prohibit reconciliation in divorce cases with a history of domestic violence, GREVIO strongly encourages the Ukrainian authorities to introduce screening mechanisms to ensure the systematic detection of domestic violence by judges and mediators with a view to effectively implementing the prohibition of reconciliation in family law cases with a history of domestic violence. (paragraph 216)

VI. Investigation, prosecution, procedural law and protective measures

A. General obligations (Article 49) and Immediate response, prevention and protection (Article 50)

1. Reporting to, immediate response and investigations by law-enforcement agencies

49. While welcoming the measures taken to respond to victims of conflict-related sexual violence, GREVIO urges the Ukrainian authorities to improve the response of the law-enforcement authorities to women victims of all forms of violence covered by the Istanbul Convention. They should in particular:

a. provide all relevant law-enforcement authorities with the resources, knowledge and powers to respond promptly, appropriately and with a gender-sensitive and trauma-informed perspective to all forms of violence covered by the Istanbul Convention, including sexual violence, psychological violence, sexual harassment and violence committed in the digital sphere;
b. increase the availability of specialised units for domestic violence, including mobile units;
c. develop further guidance for police officers to ensure the systematic identification and adequate needs assessment and protection of children exposed to domestic violence;
d. identify and address any obstacles preventing victims from reporting violence against women, in particular sexual violence;
e. identify the expertise accumulated by the police teams in charge of dealing with victims of conflict-related sexual violence, take measures to formalise these skills and further disseminate them. (paragraph 223)

2. Effective investigation and prosecution

50. GREVIO strongly encourages the Ukrainian authorities to take further measures to:

a. ensure a context-sensitive interpretation of the circumstances of non-consensual sexual acts, through standardised operating procedures for prosecutors, in order to ensure a common understanding of rape and sexual violence as offences based on the absence of consent;
b. ensure a uniform approach by law-enforcement authorities to all cases of domestic violence. (paragraph 230)

3. Conviction rates

51. GREVIO strongly encourages the Ukrainian authorities to take the necessary measures to ensure the adequate handling of all acts of violence against women and domestic violence at the level of the judiciary, including through an appropriate interpretation of consent and an effort to reduce the use of gender stereotypes and limit the influence of such stereotypes on the assessment of the situation, the context and the victim's testimony. They should also ensure the issuance of appropriate sanctions and assess progress made in order to identify possible gaps in the judicial response to violence against women and to ascertain where attrition might occur. (paragraph 234)

B. Risk assessment and risk management (Article 51)

52. While commending the existence of an exhaustive risk-assessment form, GREVIO strongly encourages the Ukrainian authorities to take steps to improve their practices for all forms of violence against women, including by introducing multi-agency co-operation in risk assessment that is carried out over time, in order to assess the evolving nature of the risk, and that results in risk-management plans implemented by all relevant bodies and institutions. (paragraph 241)

53. GREVIO also encourages the Ukrainian authorities to consider setting up a system, such as a domestic homicide review mechanism, to analyse all cases of gender-related killings of women, with a view to preventing them in the future and resolving any systemic shortcoming in the risk-assessment process. (paragraph 242)

C. Emergency barring orders (Article 52)

54. GREVIO strongly encourages the Ukrainian authorities to take the necessary legislative and other measures to ensure that emergency barring orders are implemented in a manner that effectively protects the safety of victims of domestic violence in case of immediate danger by temporarily barring the perpetrator from entering the joint residence with the victim. (paragraph 246)

D. Restraining or protection orders (Article 53)

55. GREVIO urges the Ukrainian authorities to take steps to increase the use of restraining and protection orders for women victims of all forms of violence covered by the Istanbul Convention. To do so, they should:

a. provide clear guidance to the judiciary about the aims and use of restraining orders;
b. ensure that restraining orders are available and accessible to victims of all forms of violence against women covered by the Istanbul Convention and to children exposed to domestic violence;
c. collect data on the number of restraining orders issued, the number of violations and the sanctions imposed as a result of such breaches. (paragraph 251)

E. Ex parte and ex officio proceedings (Article 55)

1. Ex parte and ex officio proceedings

56. GREVIO urges the Ukrainian authorities to take the legislative measures required to improve the compliance of Ukrainian legislation with Article 55, paragraph 1, of the Istanbul Convention and allow for *ex officio* prosecution of offences established in accordance with Articles 35 to 39 of the convention. (paragraph 254)

2. Victim support in legal proceedings

57. GREVIO strongly encourages the Ukrainian authorities to take steps to ensure that women victims of violence and their children receive the necessary support throughout court proceedings, to minimise the risks of secondary victimisation while fully supporting their empowerment. (paragraph 257)

F. Measures of protection (Article 56)

58. GREVIO invites the Ukrainian authorities to step up efforts to protect the rights and interests of women victims of all forms of violence covered by the Istanbul Convention and children exposed to such violence in order to prevent secondary victimisation throughout legal proceedings. To do so, they should take measures to ensure that law-enforcement officers and the judiciary effectively and consistently make use of existing safeguards. (paragraph 261)

G. Legal aid (Article 57)

59. While welcoming the availability of free legal aid through the extensive network of free legal aid centres, GREVIO encourages the Ukrainian authorities to step up efforts to identify and remove any obstacles for victims of all forms of violence against women covered by the Istanbul Convention to access free legal aid. (paragraph 265)

VII. Migration and asylum

A. Residence status (Article 59)

60. GREVIO strongly encourages the Ukrainian authorities to take the necessary legislative and other measures to ensure conformity of Ukrainian legislation with Article 59 of the Istanbul Convention, notably by ensuring that migrant women victims whose residence status depends on that of their spouse have access to an autonomous residence permit in order to be able to leave an abusive relationship. (paragraph 269)

B. Gender-based asylum claims (Article 60)

2. Accommodation

61. GREVIO urges the Ukrainian authorities to take the necessary legislative and other measures to comply with the requirements of Article 60 of the Istanbul Convention, notably by ensuring a gender-sensitive interpretation of the grounds for requesting and granting refugee status and asylum, by introducing vulnerability screening to ensure adequate protection for women victims of gender-based violence or for those at risk thereof in any accommodation provided, as well as by ensuring their access to specialist support services. (paragraph 274)

Appendix II
List of the national authorities, other public bodies, non-governmental organisations and civil society organisations with which GREVIO held consultations

National authorities

Government Commissioner for Gender Policy
Ministry of Defence
Ministry of Education and Science
Ministry of Health
Ministry of the Interior/National Police
Ministry of Justice/State Judicial Administration
Ministry of Social Policy, Family and Unity of Ukraine/ Expert Group on Combating Trafficking in Human Beings, Domestic Violence and Gender Equality/National Social Service
Ministry of Veteran Affairs
National Agency on Civil Service
National Training Centre for Preventing and Combating Violence against Women
National School of Judges
Prosecutor General's Office
Training Centre for Prosecutors
State Migration Service of Ukraine

Public bodies

Centre for Gender Equality, Preventing and Combating Violence of the Kyiv City
Office of the Ukrainian Parliament Commissioner for Human Rights

Civil society organisations

Association of Roma Women "Voice of Romni"
Centre of Social Partnership Perspektyva
"Chiricli" Roma Women Fund
Foundation "Sylni"
La Strada-Ukraine
Organisation "Girls"
Organisation "The Tenth of April"
Public Movement "Faith, Hope, Love"
SEMA Ukraine
Smile Ukraine
Ukrainian Foundation for Public Health
Ukrainian Legal Advisory Group
Ukrainian Women Lawyers' Association (JurFem)
Women's March
Women's Perspectives Centre
Women Veteran's Movement

GREVIO, the *Group of Experts on Action against Violence against Women and Domestic Violence*, is an independent human rights monitoring body mandated to monitor the implementation of the *Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence* (Istanbul Convention) by the Parties.

The Istanbul Convention is the most far-reaching international treaty to tackle violence against women and domestic violence. Its comprehensive set of provisions spans far-ranging preventive and protective measures as well as a number of obligations to ensure an adequate criminal justice response to such serious violations of human rights.

This report contains an overall analysis of the implementation of the provisions of the Istanbul Convention. It highlights positive initiatives in preventing and combating all forms of violence against women at national level and provides suggestions and proposals to improve the situation of women facing such violence.

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