

ECRI REPORT ON UKRAINE

(sixth monitoring cycle)



Adopted on 30 june 2026

Published on 21 October 2026

TABLE OF CONTENTS

FOREWORD	4
PRELIMINARY REMARKS.....	5
SUMMARY	6
FINDINGS AND RECOMMENDATIONS	8
<i>I. EFFECTIVE EQUALITY AND ACCESS TO RIGHTS.....</i>	8
A. EQUALITY BODIES	8
B. INCLUSIVE EDUCATION	9
C. IRREGULARLY PRESENT MIGRANTS	12
D. LGBTI EQUALITY	12
<i>II. HATE SPEECH AND HATE-MOTIVATED VIOLENCE.....</i>	16
A. HATE SPEECH.....	16
B. HATE-MOTIVATED VIOLENCE.....	19
<i>III. INTEGRATION AND INCLUSION.....</i>	23
A. MIGRANTS	23
B. ROMA.....	25
<i>IV. TOPICS SPECIFIC TO UKRAINE.....</i>	29
A. ANTI-DISCRIMINATION LEGISLATION	29
B. PREVENTING AND COMBATING RACISM AND INTOLERANCE WITHIN THE NATIONAL POLICE, STATE BORDER GUARD SERVICE AND THE ARMED FORCES	29
C. ISSUES RELATED TO SPECIFIC RELIGIOUS GROUPS IN THE CONTEXT OF THE FULL-SCALE WAR OF AGGRESSION AGAINST UKRAINE.....	32
INTERIM FOLLOW-UP RECOMMENDATIONS.....	34
LIST OF RECOMMENDATIONS	35
BIBLIOGRAPHY	38
APPENDIX: GOVERNMENT'S VIEWPOINT	42

FOREWORD

The European Commission against Racism and Intolerance (ECRI), established by the Council of Europe, is an independent human rights monitoring body specialised in questions relating to the fight against racism, discrimination (on grounds of “race”, ethnic/national origin, colour, citizenship, religion, language, sexual orientation and gender identity), xenophobia, antisemitism and intolerance. It is composed of independent and impartial members appointed on the basis of their moral authority and recognised expertise in dealing with racism, xenophobia, antisemitism and intolerance.

In the framework of its statutory activities, ECRI conducts country monitoring work, which analyses the situation in each of the member States of the Council of Europe regarding racism and intolerance and draws up suggestions and proposals for dealing with the problems identified.

ECRI's country monitoring deals with all member States on an equal footing. The work takes place in 5-year cycles. The reports of the first round were completed at the end of 1998, those of the second round at the end of 2002, those of the third round at the end of 2007, those of the fourth round in the beginning of 2014, and those of the fifth round at the end of 2019. Work on the sixth round reports started at the end of 2018.

The working methods for the preparation of the reports involve documentary analyses, a visit to the country concerned, and then a confidential dialogue with the national authorities.

ECRI's reports are not the result of inquiries or testimonial evidence. They are analyses based on information gathered from a wide variety of sources. Documentary studies are based on a large number of national and international written sources. The in situ visit provides the opportunity to meet with the parties directly concerned (both governmental and non-governmental) with a view to gathering detailed information. The process of confidential dialogue with the national authorities allows the latter to provide, if they consider it necessary, comments on the draft report, with a view to correcting any possible factual errors which the report might contain. At the end of the dialogue, the national authorities may request, if they so wish, that their viewpoints be appended to the final ECRI report.

The sixth round country reports focus on three topics common to all member States: (1) Effective equality and access to rights, (2) Hate speech and hate-motivated violence, and (3) Integration and inclusion, as well as a number of topics specific to each one of them.

In the framework of the sixth cycle, priority implementation is requested again for two specific recommendations chosen from those made in the report. A process of interim follow-up for these two recommendations will be conducted by ECRI no later than two years following the publication of this report.

The following report was drawn up by ECRI under its own responsibility. Unless otherwise indicated, it covers the situation up to 19 March 2026; as a rule, developments since that date are neither covered in the following analysis nor taken into account in the conclusions and proposals therein.

PRELIMINARY REMARKS

Ukraine is the subject of ECRI's monitoring within the framework of its sixth-monitoring cycle, which is taking place during the exceptional circumstances of the war of aggression by the Russian Federation against Ukraine. In the statement adopted by ECRI at its 88th plenary meeting from 29 March to 1 April 2022,¹ ECRI condemned the aggression in the strongest terms, noting that it has resulted in the immense suffering of the Ukrainian people and that it was preceded and is accompanied by ultra-nationalist political discourse and propaganda by the leaders of the Russian Federation. ECRI expressed its full support to the Ukrainian people fighting for the sovereignty, independence and territorial integrity of Ukraine within its internationally recognised borders.

In its annual report for the year 2022,² ECRI underlined that the false narratives by representatives of the Russian Federation, from the highest political level, for instance describing the democratically elected Ukrainian Government and Ukrainians who did not consider themselves "pro-Russian" as neo-Nazis was absurd, nauseating and an affront to the memory of the millions of victims of Nazism. ECRI also noted that the instrumentalisation of minority rights issues by Russian political leaders was disgraceful.³

As a result of the war of aggression, millions of people have been displaced from Ukraine and have continued seeking protection and support in various countries across Europe and beyond. Their situation, regardless of their citizenship, falls outside the scope of the country monitoring of Ukraine but has on many occasions been analysed by ECRI during its monitoring of other Council of Europe member states, as noted in trends identified in ECRI's annual reports for the years 2022 and 2023.⁴

The present monitoring of Ukraine does not take into account the situation in those Ukrainian territories that are currently not under the effective control of the Ukrainian authorities, to whom the report and recommendations are addressed. This concerns more specifically the Autonomous Republic of Crimea and the city of Sevastopol, as well as parts of the Donetsk, Kherson, Luhansk and Zaporizhzhia regions, which are temporarily occupied by the Russian Federation or where hostilities have been conducted.

It should also be noted that martial law was introduced in Ukraine in March 2022 and was still in force at the time of the visit to Ukraine in September 2025.⁵ Against this background, in accordance with Article 15 of the European Convention on Human Rights, the Ukrainian authorities have taken measures derogating from their obligations under Articles 5 (right to liberty and security), 6 (right to a fair trial), 8 (right to respect for private and family life) and 13 (right to an effective remedy) of the Convention.⁶

ECRI's monitoring also takes place in the broader context of the Council of Europe's steadfast support for Ukraine through legal assistance, capacity building and co-operation initiatives, as reiterated for example in the Reykjavík Declaration and by the Council of Europe's Secretary General in several subsequent political statements and documents of reference.⁷

¹ [Statement](#) of the European Commission against Racism and Intolerance (ECRI) on the consequences of the aggression of the Russian Federation against Ukraine (adopted at its 88th plenary meeting, 29 March-1 April 2022).

² [Annual Report](#) on ECRI's activities covering the period from 1 January to 31 December 2022.

³ In this connection, ECRI referred to the [statement](#) of 20 May 2022 issued by the Council of Europe's Advisory Committee on the Framework Convention for the Protection of National Minorities (AC FCNM).

⁴ [Annual Report](#) on ECRI's activities covering the period from 1 January to 31 December 2023; [Annual Report](#) on ECRI's activities covering the period from 1 January to 31 December 2022.

⁵ For more details, see ECRI's [news](#) item on the visit to Ukraine.

⁶ Council of Europe Treaty Office, Reservations and Declarations: [Ukraine](#).

⁷ See, e.g.: [Reykjavík Declaration: United around our values](#), adopted during the 4th Summit of Heads of State and Government of the Council of Europe from 16-17 May 2023; Council of Europe [Action Plan for Ukraine](#): "Resilience, recovery and reconstruction" (2023-2026); Report of the Secretary General of the Council of Europe (2025): [Towards a new democratic pact for Europe](#).

SUMMARY

Since the adoption of ECRI's fifth report on Ukraine on 20 June 2017, progress has been made and good practices have been developed in a number of fields.

The Ukrainian Parliament Commissioner for Human Rights (UPCHR), which is the national equality body, has increased its work in the areas of equality and non-discrimination, including by strengthening cooperation with civil society and groups of concern to ECRI and expanding its presence across the country through regional offices and representatives.

The authorities, often with civil society actors and international organisations, have supported some ad hoc teacher trainings on human rights and inclusive education. Moreover, the Law on Education places an obligation on schools to respond to bullying and discriminatory incidents.

There has been a substantial improvement in societal attitudes towards LGBTI equality. The process for legal gender recognition (LGR) has undergone some positive changes. Key legislative proposals are pending before the Ukrainian Parliament regarding same-sex partnerships and the inclusion of sexual orientation and gender identity as protected grounds under relevant anti-discrimination and hate crime legislation.

Despite the lack of appropriate hate speech data, the incidence of hate speech in the country is said to have decreased since the start of the full-scale war of aggression against Ukraine. A new Law on Media entered into force, which prohibits hate speech and incitement to hatred in mass media and on video-sharing platforms.

There has been more training for police officers aimed at improving their capacity to identify hate elements and investigate hate crimes, as well as to build stronger relations with groups of concern to ECRI.

Key legislative and policy developments took place in relation to Roma inclusion, such as the adoption of a National Roma Strategy until 2030 and related action plans, the development of the National and Cultural Programme "Unity in Diversity", and the passing of the Law on National Minorities in 2023. There have also been good examples of proactive outreach to Roma communities to provide undocumented Roma with relevant identity documents.

ECRI welcomes these positive developments in Ukraine. However, despite the progress achieved, some issues give rise to concern.

ECRI is concerned that, despite a sharp increase in the number of complaints received and inspections carried out by the UPCHR, it has not been provided with corresponding financial and human resources to fully and effectively implement the full breadth of its mandate.

There is a reported lack of inclusion of Roma history in school curricula, including of Roma culture as part of Ukraine's diverse national identity. Another gap is the lack of sexuality education that address LGBTI-related topics in a manner which is sensitive, age-appropriate and emphasises equality and inclusion. Bullying in Ukrainian schools, particularly against LGBTI pupils, is also of concern to ECRI.

Access to healthcare continues to be an issue for many LGBTI persons, particularly transgender persons, and the LGR process still requires them to undergo a psychiatric assessment and hormone therapy. Many transgender persons are said to be unable to access LGR in practice. There is no legal prohibition of medically unnecessary surgeries (so-called "sex-normalising" surgeries) and other non-therapeutic treatments on intersex persons.

LGBTI persons and Roma appear to be particularly targeted by hate speech. Many hate crime incidents continue to be misclassified and prosecuted under ordinary offences such as hooliganism. Some hate incidents were reportedly organised and carried out by extremist groups. Underreporting of hate crimes continues to be an issue.

Ukraine lacks a clear, dedicated policy framework on the integration of migrants. There are challenges as regards support for language-learning and the need for better intercultural support in schools.

The war of aggression against Ukraine further exacerbated challenges faced by Roma, in particular internally displaced Roma, such as in the areas of education and employment.

There have been a number of reports of incidents involving allegations of racist or LGBTI-phobic misconduct by officials of the National Police, State Border Guard Service and the Armed Forces. There are also concerns as regards the negative impact of military service obligations on certain religious minorities.

In this report, ECRI requests that the authorities take action in a number of areas and makes a series of recommendations, including the following.

The Ukrainian authorities should ensure that the UPCHR receives adequate human and financial resources, which should be commensurate to its increased workload and range of competencies, allowing it to carry out the full breadth of its mandate effectively.

The authorities should implement measures aimed at promoting understanding of and respect for LGBTI pupils in schools and at preventing LGBTI-phobic bullying, such as developing guidelines for school staff, adopting a zero-tolerance policy towards such acts in schools, and developing tailored training for educators.

When it comes to LGBTI equality, the authorities should take several measures to improve access to healthcare for LGBTI persons, such as ensuring that transgender people have safe, affordable, and timely access to necessary gender-affirming treatments, as well as to move forward with the revision of relevant legislation and healthcare protocols in relation to LGR.

The authorities should establish an inter-institutional working group tasked with monitoring hate speech, with a particular emphasis placed on racist and LGBTI-phobic forms of hate speech, as well as making proposals for action.

The authorities should, as a matter of priority, conduct awareness-raising campaigns across the country with a view to preventing hate speech, including online hate speech, against groups of concern to ECRI, in particular LGBTI persons and Roma, by stressing the importance of diversity and tolerance in society, in cooperation with relevant civil society actors.*

As regards hate crimes, the authorities should continue their efforts to propose or support amendments to relevant legislation to ensure, among others, that they explicitly include sexual orientation, gender identity, sex characteristics, ethnic origin, and colour in the list of protected grounds.

Moreover, the authorities should take further steps to ensure that hate crimes are adequately registered, investigated and prosecuted, including by providing tailored and practical training on this issue to police and other criminal justice actors.

As a matter of priority, the authorities should create a task force involving representatives of relevant ministries and services, regional and local authorities, civil society organisations and the UPCHR, aimed at proactively identifying and supporting Roma in need of proper identification documents, including by further simplifying administrative procedures and by ensuring targeted support to overcome administrative barriers, where necessary.*

Moreover, the authorities should take action to ensure access to quality education for Roma children with a view to increasing school enrolment and combating drop-out, for example by creating outreach initiatives to encourage school attendance to Roma children living in compact settlements, in close coordination with Roma mediators and the families concerned.

The authorities should send a firm, regular message of zero tolerance for racism, religious intolerance, and LGBTI-phobia within the National Police, State Border Guard Service, and Armed Forces, including through appropriate training and, where necessary, relevant instructions.

* The recommendations in this paragraph will be subject to a process of interim follow-up by ECRI no later than two years after the publication of this report.

FINDINGS AND RECOMMENDATIONS

I. EFFECTIVE EQUALITY AND ACCESS TO RIGHTS

A. Equality bodies

1. The Ukrainian Parliament Commissioner for Human Rights (UPCHR) is the national equality body in Ukraine. According to Article 101 of the Constitution, it has the mandate to exercise parliamentary control over the observance of human rights and freedoms.¹ Article 4 of its enabling legislation states that the Commissioner performs his or her duties independently.² The UPCHR's equality body function is described in Article 10 of the Law on the Principles of Preventing and Combating Discrimination, according to which the UPCHR has the mandate to prevent any forms of discrimination and to take measures to counter them.³
2. During its 2025 visit to Ukraine, the ECRI delegation consistently heard that the UPCHR has increased its work in the areas of equality and non-discrimination in the past years, including by supporting legislative proposals of relevance⁴ and by strengthening cooperation with civil society and groups of concern to ECRI. ECRI welcomes the creation of expert councils that operate, for example, under the auspices of the UPCHR Representative for Equal Rights and Freedoms, Rights of National Minorities, Political and Religious Views.⁵ Another positive development is the expansion of the UPCHR's presence across the country through regional offices and representatives. During its visit, the ECRI delegation met the UPCHR's representative in the Zakarpattia region, whose work illustrates the benefits of the equality body's stronger engagement at regional and local levels and its improved accessibility for communities at risk of discrimination. ECRI considers it a **good practice**.
3. ECRI is concerned that, despite a sharp increase in the number of complaints received and inspections carried out by the UPCHR,⁶ it has not been provided with corresponding financial and human resources to fully and effectively implement the full breadth of its mandate.⁷ While recognising Ukraine's financial constraints, ECRI underlines that the UPCHR's work to advance equality and counter discrimination has become even more important in the context of the ongoing war of aggression against Ukraine and the country's future recovery.
4. ECRI recommends that the authorities ensure that the UPCHR receives adequate human and financial resources, which should be commensurate to its increased workload and range of competencies, allowing it to carry out the full breadth of its mandate effectively, in line with ECRI's revised General Policy Recommendation (GPR) No. 2 on equality bodies to combat racism and intolerance at national level.
5. ECRI was informed that a bill aimed at amending the law on the UPCHR is pending before the Ukrainian Parliament.⁸ The bill contains several positive aspects, such

¹ Ukraine, Article 101 of the [Constitution of Ukraine](#).

² Ukraine, [Law on the Ukrainian Parliament Commissioner for Human Rights](#). The UPCHR was last reaccredited as an A-status National Human Rights Institution (NHRI) in 2019. See: GANHRI (2019).

³ Ukraine, [Law on the Principles of Preventing and Counteracting Discrimination in Ukraine](#). In 2023, the UPCHR became a member of the European Network of Equality Bodies (Equinet).

⁴ For example, the UPCHR has supported the adoption of legislative proposals on registered civil partnerships, including same-sex partnerships (see section I.D. below). See: UPCHR (2025a): section 10.1.1.

⁵ The expert councils provide advice to the UPCHR and bring it closer to civil society actors across Ukraine. The Expert Council on Issues of National Minorities and Indigenous Peoples was established in November 2022, while the Expert Council on Issues of Compliance with Equal Rights, Prevention of Discrimination, Domestic Violence and Human Trafficking was created in April 2024.

⁶ For example, in 2023, the UPCHR received 1 670 complaints in the area of 'ensuring equal rights and freedoms' alone, nearly double the 867 received in 2022. See: UPCHR (2024a).

⁷ See: European Commission (2024): 37, GANHRI (2019): 22, UPCHR et al (2023): 65-67.

⁸ Draft Law on the Ukrainian Parliament Commissioner for Human Rights ([no. 13181](#) of 17 April 2025).

as introducing a more transparent appointment process and reducing the number of members of parliament required to nominate a candidate. However, ECRI regrets that many proposals from the UPCHR, developed in consultation with an expert group, were ultimately not included in the bill.⁹ In particular, the bill does not address long-standing concerns regarding the lack of a formalised process for involving civil society actors in the selection procedure for the Commissioner. ECRI trusts that the necessary amendments will be introduced in Parliament to address this issue.¹⁰

6. Another area of concern relates to potential dismissal of the Commissioner. In May 2022, the Ukrainian Parliament amended the martial law, allowing the possibility of dismissing officials whose appointment falls within its powers (such as the Commissioner) through a vote of no confidence.¹¹ In the view of ECRI, this appears to be inconsistent with the UPCHR's enabling law, which states that the powers of the Commissioner cannot be terminated or limited even in the event of a martial law or a state of emergency, except under conditions explicitly laid down in the legislation.¹² In 2022, the former Commissioner was dismissed from the post. An appeal against the dismissal was ultimately rejected by the Supreme Court in February 2025.¹³ However, civil society organisations remain concerned that this precedent of expedited dismissal may create factual or perceived political pressure on current or future Commissioners.¹⁴ ECRI encourages the Ukrainian authorities to commission an independent review of the applicable legislation under state of emergency or martial law and take action with a view to ensuring that there are appropriate legal safeguards against any undue termination or limitation of the Commissioner's terms of office, in line with international and European standards.

B. Inclusive education¹⁵

7. According to Article 6 of the Law on Education, "fostering respect for human rights and freedoms, and intolerance for the humiliation of a person's honour and dignity, physical or psychological violence and discrimination on any grounds" is one of the principles of Ukraine's education policy, alongside developing a culture of democracy.¹⁶ In October 2022, the Decree on the Development of Civic Education was amended to provide guidance on the meaning, challenges, and application of civic education.¹⁷ Within the framework of a broad education reform, the New Ukrainian School (NUS), a competency-based approach is also being implemented that, according to the authorities, has civic responsibility and human rights as cross-cutting themes.¹⁸

⁹ See, in this regard: ZMINA (2025).

¹⁰ See: [ECRI's revised GPR no 2](#) on equality bodies to combat racism and intolerance at national level. See also Recommendation [CM/Rec\(2021\)1](#) of the Committee of Ministers to member States on the development and strengthening of effective, pluralist and independent national human rights institutions.

¹¹ Ukraine, Law on amendments to certain laws of Ukraine regarding the functioning of the civil service and local self-government during the period of martial law, [No. 2259-IX](#), adopted on 12 May 2022.

¹² Article 9, [Law on the Ukrainian Parliament Commissioner for Human Rights](#).

¹³ Ukraine Supreme Court, [case no. 990/92/2211-3213ai24](#) of 27 February 2025, available in Ukrainian.

¹⁴ Coalition of CSOs (2025): 420-421.

¹⁵ This section deals with education policies that aim to combat exclusion and marginalisation through an inclusive education devised for all, and to create an inclusive society respectful of diversity in accordance with sections II and III of ECRI's GPR No. 10 on combating racism and racial discrimination in and through school education. It relates to education for all children and young people. Specific measures for the education of migrants and Roma are dealt with under the heading of integration and inclusion.

¹⁶ Article 6, [Law on Education](#).

¹⁷ Ukraine, Cabinet of Ministers, [Decree No. 893-r](#), 8 October 2022.

¹⁸ The [New Ukrainian School](#) is a education reform aimed at modernising Ukraine's schooling by focusing on competencies, creativity, and child-centred learning. The reform began in 2018 with first graders and is being introduced step by step. The full cycle covering all 12 years of schooling is planned to be completed by 2030.

8. The teaching of competences and subjects related to inclusive education is scattered across the school curricula in primary, secondary and high school, for example through the subjects "I Explore the World", "Civic Education", "History", "Health and Safety" and "Law".¹⁹ The latter's curriculum, in particular, includes the teaching of human rights, freedoms and duties for Grade 10 students. However, the information gathered during the 2025 visit suggest that the level of teaching on human rights may vary between schools and at times insufficiently covers issues related to diversity and non-discrimination. This points to possible gaps between state standards related to inclusive education and their application in practice.²⁰
9. ECRI recommends that the authorities ensure, in consultation with relevant civil society organisations and representatives of groups of concern to ECRI, that human rights education comprises mandatory topics related to human rights, equality and diversity to be covered by all schools in practice.
10. ECRI notes that, according to the authorities, issues relating to the history and culture of various ethnic and religious communities, including Roma, are reflected in the school curricula for the history of Ukraine, world history, and civic education. In contrast, civil society actors considered that Roma history was not properly reflected in school curricula, notably the Roma Holocaust and Roma culture as part of Ukraine's diverse national identity.²¹ ECRI encourages the authorities to strengthen their efforts to ensure that Roma culture and history, including the Roma Holocaust, are given due attention in the school curricula and in schools across the country.
11. It emerges from ECRI's findings during the 2025 visit that there was no comprehensive sex education in schools that was inclusive of diversity in sexual orientation and gender identity and that attempts to introduce such education have faced strong resistance.²² ECRI strongly encourages the authorities to ensure that relevant curricula, including of sexuality education, address LGBTI-related topics in a manner which is sensitive, age-appropriate and place particular emphasis on equality and inclusion.
12. As regards the training of teachers, according to the authorities, programmes at pedagogical universities include courses related to inclusion and civic education. ECRI was informed that institutes of postgraduate pedagogical education offer advanced training on subjects such as "Prevention of Discrimination", "Pedagogy of Tolerance", and "Working with children with war or migration experiences". However, there are reports that, when such subjects are included in training, insufficient time is dedicated to such issues and that there are not enough specialists capable of teaching them in the country.²³
13. ECRI was informed that the authorities, often with civil society actors and international organisations, have supported *ad hoc* teacher trainings on human rights and inclusive education.²⁴ Moreover, e-learning platforms are available to teachers, on a voluntary basis, offering free courses related to working in a multicultural environment. In ECRI's view, these are steps in the right direction.

¹⁹ The Ministry of Education and Science [provides](#) examples of typical curricula for subjects in primary, middle and high school, aimed at supporting stakeholders in adjusting Ukrainian children to new schools and curriculums in other countries.

²⁰ OSCE (2021); UN CERD (2025): § 38.

²¹ Chiricli and ERGO Network (2025): 13; ARCA et al (2025): 16.

²² See, e.g.: Gender Stream (2024): 4-5; Shevtsova (2021).

²³ OSCE (2021). Similar needs were identified by the Cabinet of Ministers in relation to the development of civic education. See: Ukraine, Cabinet of Ministers, [Decree No. 893-r](#), 8 October 2022.

²⁴ For example, in July 2025, 24 youth workers, teachers, and educators enhanced their competences by [participating](#) in a five-day training to apply the "Compass: Manual for Human Rights Education with Young People". The Ministry of Youth and Sports and Ministry of Education and Science of Ukraine were partners of the activity. Another example is the "Advanced Human Rights Training for School Teachers" [organised](#) by the Organisation for Security and Cooperation in Europe (OSCE) and the Ministry of Education and Sciences in August 2024.

ECRI encourages the authorities to take further action to ensure that teachers and other education professionals receive comprehensive, mandatory initial and ongoing training on human rights, equality, diversity, and inclusion issues.

14. When it comes to racist and LGBTI-phobic bullying in schools, the Law on Education places an obligation on schools to respond to bullying and discriminatory incidents.²⁵ The Ukrainian authorities have also adopted a National Strategy for Building a Safe and Healthy Educational Environment in the New Ukrainian School, including elements on combating bullying.²⁶ In 2024, the Ministry of Education and Science launched an online platform where pupils and their parents can report bullying instances, leading to the involvement of the school administration and, if necessary, the police.²⁷ Information and guidance on how to respond to bullying and how to use the new platform were also made available to educators.²⁸ ECRI was informed that disaggregated data on bullying incidents could be easily gathered from that platform upon request. Drawing on this positive development, ECRI encourages the authorities to strengthen the monitoring of and data collection on racist and LGBTI-phobic bullying. Such monitoring and data collection would help the authorities to move on from general anti-bullying activities to developing and implementing group-specific modules against bullying of children in situation of greater vulnerability on the grounds relevant to ECRI.
15. In this regard, ECRI remains concerned about reports of bullying in Ukrainian schools, particularly against LGBTI pupils. According to a 2020 survey with 1 743 LGBTI pupils, 44% reported that they felt unsafe at school because of their sexual orientation, more than half reported that their classmates or other pupils often used homophobic or transphobic language at school, and 66.8% that they heard such language from teachers and other staff. Close to 30% reported that they experienced physical harassment at school because of their sexual orientation or gender identity.²⁹ ECRI also received reports that secondary school teachers are rarely trained on how to foster inclusive environments for LGBTI pupils or how to engage with their families.³⁰
16. ECRI recommends that the authorities implement measures aimed at promoting understanding of and respect for LGBTI pupils in schools and at preventing LGBTI-phobic bullying, such as developing guidelines for school staff, adopting a zero-tolerance policy towards such acts in schools, and developing tailored training for educators.
17. The authorities informed ECRI that, in 2024, Ukraine launched the Educational Security Service initiative, which aimed at placing – on an experimental basis – a specially trained member of the National Police in schools where a need for enhanced security has been identified by the head of the institution or its founder. Such police officers are present full-time, and their role includes controlling access to schools and implementing interactive activities with pupils and educators aimed at crime prevention.³¹ ECRI was also informed that such police officers also work to prevent and respond to bullying. At the same time, ECRI notes that the permanent presence of police officers in schools may raise concerns regarding the securitisation of education, particularly with regard to its impact on trust among

²⁵ Article 25, [Law on Education](#).

²⁶ Ukraine, [National Strategy for Building a Safe and Healthy Educational Environment in the New Ukrainian School](#).

²⁷ See the [anti-bullying section](#) of the AIKOM (Automated Information Complex of Educational Management), in Ukrainian.

²⁸ See, in Ukrainian, the [article](#) by the Ministry of Education and Sciences with guidance for educators on how to respond to bullying.

²⁹ TERGO (2021). Moreover, 30% and 29% of parents reported they would not accept LGBTI or Roma children, respectively, to study with their children. See: Council of Europe (2022a): 28.

³⁰ See, for example, Gender Stream (2024).

³¹ More information can be found on the [webpage](#) of the New Ukrainian School and at the [website](#) of the Education Ombudsman. According to the authorities, as of April 2026, 1 813 general secondary education institutions were covered by the initiative.

pupils and their families, especially those from minority backgrounds. While recognising that ensuring the safety of all schoolchildren is of utmost importance, ECRI invites the authorities to commission an independent assessment of the impact of the permanent presence of police officers in school environments, including from the perspective of how it impacts the wider role of schools in the area of inclusive education and trust among pupils and their families from minority backgrounds.

C. Irregularly present migrants

18. A study conducted by the International Organisation for Migration (IOM) found that between 37,700 and 60,900 migrants may have been living in Ukraine without regular legal status in 2021, most of whom faced socioeconomic and administrative issues due to their migration status.³² The full-scale war of aggression against Ukraine has drastically altered the migration landscape in the country. While there is a lack of comprehensive information and data on migrants who are irregularly present in Ukraine since 2022, ECRI was informed by the State Migration Service that, in 2024, 3,058 irregularly present migrants were apprehended and 377 were held in so-called “temporary detention centres for foreigners and stateless persons illegally staying”.
19. Despite the lack of clear safeguards in legislation, according to the authorities, migrants who are irregularly present in the country are generally not referred to migration and law enforcement agencies when accessing basic rights, such as the right to school education or emergency healthcare. ECRI encourages the authorities to consider legislation to formally decouple immigration control and enforcement from the provision of basic services and rights to irregularly present migrants.
20. As regards more specifically access to education, the ECRI delegation heard from several interlocutors during the 2025 visit that many of them have faced bureaucratic obstacles, particularly when they do not have the necessary documentation. Moreover, ECRI is concerned that, although irregularly present migrants can receive emergency medical care, they are asked to reimburse the costs after the provision of such care.³³ As a result, some of them, especially those most in need, may avoid seeking emergency healthcare for purely financial reasons. ECRI encourages the authorities to ensure that migrants who are irregularly present in Ukraine can effectively access emergency healthcare in practice, including those who are unable to cover such costs.

D. LGBTI equality³⁴

21. ECRI notes that there has been a substantial improvement in societal attitudes towards LGBTI equality in recent years. For example, according to a survey conducted by the Kyiv International Institute of Sociology (KIIS), 70.4% of respondents support equal rights for LGBTI persons, compared to 33.4% in 2016.³⁵ According to various interlocutors met during the 2025 visit, such a change can be attributed, among others, to the work of civil society actors in raising public awareness about LGBTI persons, including those who served or are currently serving in the Ukrainian Armed Forces, together with the growing pro-European sentiment in the general population. Notwithstanding these positive developments, ECRI notes that LGBTI persons in Ukraine remain vulnerable to discrimination.
22. Against this background, ECRI takes positive note that Ukraine’s Roadmap on the Rule of Law, approved in May 2025 in the context of the country’s accession

³² IOM (2021): 6-7.

³³ Ukraine, Cabinet of Ministers, [Decree No.121](#), 19 March 2014.

³⁴ For terminology, see ECRI’s [Glossary](#).

³⁵ KIIS (2024); ILGA Europe (2025): 2. See also: National Democratic Institute (2024) and LGBTI Consortium (2024).

negotiations with the European Union (EU), includes many commitments towards LGBTI equality.³⁶ Moreover, at the time of ECRI's 2025 visit, the Ministry of Justice was drafting amendments to the National Human Rights Strategy³⁷ and, in this context, proposed to include a dedicated section on the human rights of LGBTI persons.

23. As far as the legislation is concerned, amendments were made to the Law on Advertising in 2022, which now includes "sexual orientation" among the prohibited discrimination grounds when publishing requirements in job vacancies. However, gender identity was not included in the list.³⁸ More generally, ECRI regrets that the grounds of sexual orientation, gender identity and sex characteristics are still not explicitly included in several anti-discrimination provisions, particularly in the Law on the Principles of Preventing and Counteracting Discrimination.³⁹
24. ECRI was informed that Draft Law No. 5488, developed by the Ministry of Internal Affairs and submitted to the Ukrainian Parliament by the Cabinet of Ministers in 2021, was automatically withdrawn from parliamentary consideration due to the formation of a new government in July 2025.⁴⁰ The draft law aimed, among others, to explicitly include sexual orientation and gender identity among the protected grounds in hate crime and anti-discrimination provisions. On 4 August 2025, Draft Law No. 13597 was submitted by members of parliament,⁴¹ also proposing the inclusion of the aforementioned grounds in relevant legislation. However, during the September 2025 visit, the ECRI delegation heard concerns from civil society actors that some other proposed amendments that have been tabled would weaken the proposed provisions in this draft law, including by removing explicit references to sexual orientation and gender identity as discrimination grounds.
25. ECRI recommends that the authorities strongly support the adoption of legislative amendments to explicitly include the grounds of sexual orientation and gender identity in the Law on the Principles of Preventing and Combating Discrimination and other relevant legislation with anti-discrimination provisions. If necessary, Council of Europe support should be sought.
26. Ukraine does not have any form of legal recognition of same-sex couples, be it marriage or registered civil partnerships. On 1 June 2023, the European Court of Human Rights (ECtHR), in the case of Maymulakhin and Markiv v. Ukraine (no. 75135/14), found that the lack of any form of legal recognition and protection for the applicants (a same-sex couple) compared to different-sex couples, amounted to discrimination on the grounds of sexual orientation.⁴² ECRI notes positively that the Ukrainian authorities have committed to recognising same-sex partnerships and that they see it as an important step in harmonising Ukrainian legislation with European standards.⁴³ Different legislative proposals have been tabled in the Ukrainian Parliament for this purpose, namely Draft Law No. 9103 and Draft Law No. 12252.⁴⁴ ECRI trusts that the authorities will support the prompt passing of appropriate legislation providing legal recognition of same-sex partnerships and adequate protection to same-sex couples.

³⁶ Ukraine, Cabinet of Ministers, [Order No. 475-r](#), 14 May 2025.

³⁷ Ukraine, [Decree No. 119/2021](#), 24 March 2021.

³⁸ Ukraine, [Law No. 2253-IX](#) on amendments to certain legislative acts regarding strengthening the protection of workers' rights.

³⁹ Ukraine, [Law on the principles of preventing and counteracting discrimination in Ukraine](#). See: ECRI (2017): 115-116.

⁴⁰ According to Ukrainian parliamentary procedures, draft laws (bills) submitted by a previous Cabinet of Ministers are automatically withdrawn from consideration upon the formation of a new government, which may subsequently decide to reintroduce them.

⁴¹ Ukraine, [Draft Law No. 13597](#) on amendments to the Code on Administrative Offences and the Criminal Code regarding the fight against discrimination.

⁴² European Court of Human Rights, Maymulakhin and Markiv v. Ukraine, [no. 75135/14](#), 1 June 2023.

⁴³ See, in this connection, the [action plan](#) submitted by the Ukrainian authorities and the [notes and decisions](#) by the Committee of Ministers of the Council of Europe on the execution of the Court judgment.

⁴⁴ Ukraine, [Draft Law No. 9103](#) and [Draft Law No. 12252](#).

27. In December 2024, the Cabinet of Ministers updated the procedure for the assignment and payment of one-time monetary compensation following the death of military personnel, which now allows for a beneficiary to be a person who lived with the deceased as a family, even if they were not married. However, the fact of living as a family must be established by a court decision.⁴⁵ ECRI trusts that this matter will be further addressed through appropriate legislative and other measures providing legal recognition of same-sex partnerships, in consultation with relevant LGBTI actors.⁴⁶
28. Access to healthcare continues to be an issue for many LGBTI persons, particularly transgender persons,⁴⁷ including those serving in the military.⁴⁸ In the aftermath of the full-scale aggression, the Council of Europe Commissioner for Human Rights noted that “shortages in medication required by some LGBTI people in Ukraine, including hormones for trans[gender] people, medication for intersex people and antiretroviral medication” were of immediate concern.⁴⁹ Reportedly, access to medical treatment is increasingly inconsistent, with the costs of hormone therapy escalating significantly. Although the Affordable Medicines Programme, introduced in 2017, allows people to access certain prescription medications either free of charge or at reduced cost, it does not cover hormone replacement therapy drugs.⁵⁰ Civil society organisations have sought to fill this gap. However, such civil society support is often financially unsustainable, have limited reach beyond larger cities, and is at times dependent on donor priorities.⁵¹ As a result, many transgender persons self-medicate or use hormonal treatment without adequate medical supervision, which poses a health risk. In practice, gender affirming surgeries are also not available through the public health system and most transgender persons have to resort to private clinics at high cost.⁵²
29. Another reported issue is the insufficient number of healthcare specialists in Ukraine trained to work with LGBTI persons, who are mostly concentrated in large cities and often have long waiting lists.⁵³ ECRI takes positive note of initiatives by NGOs to identify, support, and provide information about such doctors.⁵⁴
30. ECRI recommends that the authorities strengthen their efforts to improve access to healthcare for LGBTI persons, including by (i) ensuring, as far as possible, that transgender people have safe, affordable, and timely access to necessary gender-affirming treatments; (ii) providing training to healthcare professionals aimed at enhancing awareness, sensitivity, and understanding of the needs of LGBTI persons in this field, if necessary by engaging with universities and medical associations; (iii) working alongside LGBTI communities and relevant civil society actors to improve access of LGBTI persons to information about available healthcare and their rights in this field.

⁴⁵ See: Nash Svit Center (2025): 3.

⁴⁶ For instance, the organisation [Ukrainian LGBT+ Military and Veterans for Equal Rights](#), which existed as an informal community for several years, was formally established in 2018 and has more than 500 members, with the aim of uniting LGBTI military personnel and advocating for equal rights through the amendment of regulation, statutes, and legislation.

⁴⁷ ECOM (2023); Global Public Policy Institute (2024): 8; ILGA Europe (2025): 4; TGEU et al (2024): 23.

⁴⁸ Insight (2024).

⁴⁹ CoE Commissioner for Human Rights (2022).

⁵⁰ Insight (2024).

⁵¹ Global Public Policy Institute (2024): 8. For example, the termination of the relevant operations of the United States Agency for International Development (USAID) is said to have reduced access to hormonal treatment for transgender persons in Ukraine through civil society organisations, which often relied on USAID funding.

⁵² ECOM (2023); Open Democracy (2023, 8 February).

⁵³ Ibid.

⁵⁴ For example, the NGO Insight maintains a friendly doctor [database](#), primarily of specialists relevant for the process of gender recognition and periodically conducts training for such specialists on working with transgender people, while the NGO Fulcrum runs a [Friendly Doctor Programme](#) related to the testing of HIV / STIs and psychologist consultation.

31. The process for legal gender recognition (LGR) has undergone positive changes since ECRI's last report on Ukraine⁵⁵, as the previous regulation requiring a mandatory stay of 30 to 45 days in a closed psychiatric ward has been abolished.⁵⁶ However, at present, the LGR process still requires undergoing both a psychiatric assessment and hormone therapy. Against this background, ECRI welcomes that, in 2021, Ukraine initiated the process of transposing and technically adapting the international standards set out in the International Classification of Diseases (ICD-11) of the World Health Organisation, which aims to bring the LGR process in the country closer to international standards and best practices, by depathologising gender diversity. Delayed because of the war of aggression, the implementation of ICD-11 was restarted by the Ministry of Health in 2023.⁵⁷ However, since it is still in the initial stages, the depathologising standards have not yet been reflected in clinical protocols or LGR procedures.
32. While positively noting the commitment of the Ukrainian authorities to address this matter, ECRI regrets that transgender persons continue to face several challenges under the current LGR regime. For example, due to the need for a "transsexualism" diagnosis to undergo LGR, transgender persons who have done so reportedly face barriers when seeking to adopt or when trying to access state-funded assisted reproductive treatment. There are also serious concerns regarding transphobia in the healthcare system and the stigma associated with a psychiatric diagnosis.⁵⁸ Moreover, civil society actors report that many Ukrainian doctors have stopped providing a diagnosis of "transsexualism" as they fear that law enforcement agencies may suspect them of helping conscripts evade military service.⁵⁹ As a result, many transgender persons are said to be unable to access LGR in practice or require assistance from civil society organisations.
33. ECRI recommends that the authorities move forward with the revision of the relevant legislation and healthcare protocols in order to guarantee a quick, transparent, and accessible process by which transgender people can obtain legal gender recognition, which should not be contingent on abusive requirements, such as medical procedures and/or mental health diagnoses, in line with ECRI's General Policy Recommendation No. 17 on preventing and combating intolerance and discrimination against LGBTI persons and other relevant Council of Europe standards. If necessary, Council of Europe support should be sought.
34. There is no legal prohibition of medically unnecessary surgeries (so-called "sex-normalising" surgeries) and other non-therapeutic treatments on intersex persons in Ukraine. According to civil society sources, such medical interventions are still practiced both in public hospitals and in private clinics, financially covered by the public health system. Parents and children are reportedly provided with incomplete or misleading information, including about the medical necessity, risks and long-term consequences of such procedures, and are not given appropriate support.⁶⁰ ECRI encourages the authorities to take firm action towards the development of specific legislation banning medically unnecessary surgeries and other non-therapeutic treatments until such time as an intersex child is able to participate in the decision, based on the principle of free and informed consent, as well as to

⁵⁵ ECRI (2017).

⁵⁶ See: TGEU, [Ukraine Abolishes Arbitrary and Cruel Trans Health Protocol](#).

⁵⁷ Insight (2024).

⁵⁸ Global Public Policy Institute (2024): 8.

⁵⁹ Nash Svit Center (2024); ILGA Europe (2025): 4.

⁶⁰ International Intersex Human Rights NGO (2020): 3.

provide related training to healthcare professionals, placing a particular emphasis on the right of intersex persons to bodily integrity.⁶¹

II. HATE SPEECH AND HATE-MOTIVATED VIOLENCE

A. Hate speech⁶²

35. From the outset, ECRI underlines that the war of aggression against Ukraine presents a particularly challenging, yet crucial, context for addressing racist and other forms of hate speech. ECRI welcomes that the authorities have strengthened their cooperation with civil society and international organisations, including the Council of Europe,⁶³ in the past years, and have taken or committed to take several measures to improve the legislative and policy frameworks in this area.⁶⁴
36. ECRI was informed that the authorities were working on proposing a legal definition of hate speech, for which they had received expert support from the Council of Europe on applicable European standards on combating hate speech.
37. Article 161 of the Criminal Code criminalises “deliberate actions inciting national, racial or religious enmity and hatred, humiliation of national honour and dignity, or the insult of citizens' feelings in respect to their religious convictions [...]”.⁶⁵ ECRI notes that this criminal provision has been criticised for encompassing an overly broad range of actions, for being insufficiently clear as to the nature and gravity of the offences covered therein, and for the unduly restricted list of protected grounds.⁶⁶ In addition, a number of civil society organisations have stressed the need to set up a framework, under civil and administrative law, to combat hate speech with proportionate sanctions, in order to address less severe forms of hate speech.⁶⁷ According to the authorities, the above-mentioned Draft Law No. 13597 seeks to address some of these gaps. ECRI strongly encourages the authorities to take determined action with a view to developing a comprehensive and effective legal framework to prevent and combat racist and other forms of hate speech, including online, consisting of appropriately calibrated provisions of civil, administrative, and criminal law, having due regard to relevant European standards.
38. During its 2025 visit, a number of public officials met by the ECRI delegation were of the opinion that the absence of a legal definition of hate speech remains a significant obstacle for the creation of a unified system for monitoring, collecting and sharing hate speech data, which is currently lacking. ECRI nevertheless stresses the importance of promptly developing a fully-fledged mechanism for monitoring and analysing hate speech without waiting for legal reforms to be completed.
39. ECRI recommends that the authorities establish an inter-institutional working group tasked with monitoring hate speech, with a particular emphasis placed on racist and LGBTI-phobic forms of hate speech, as well as making proposals for action, having due regard to ECRI's General Policy Recommendation No. 15 on combating hate speech and the Recommendation CM/Rec(2022)16 of the Committee of Ministers of the Council of Europe on combating hate speech. Such

⁶¹ ECRI refers the authorities in particular to its [General Policy Recommendation No. 17](#) on preventing and combating intolerance and discrimination against LGBTI persons as well as to the Recommendation [CM/Rec\(2025\)7](#) of the Committee of Ministers of the Council of Europe on equal rights for intersex persons, adopted on 7 October 2025.

⁶² See definitions of hate speech and hate crime in [ECRI's glossary](#).

⁶³ Reference is made, among others, to the [project](#) “Combating hate speech in Ukraine”, which is implemented by within the third phase of the joint programme of the European Union and the Council of Europe Partnership for Good Governance (PGG).

⁶⁴ For example, see the commitments made in relation to the negotiation towards EU accession. See: Cabinet of Ministers, [Order No. 475-r](#), 14 May 2025.

⁶⁵ Ukraine, [Criminal Code](#), Article 161.

⁶⁶ Council of Europe (2022b).

⁶⁷ Coalition of CSOs (2024); UPCHR (2023): 131-132.

working group should include representatives of the relevant authorities, civil society organisations and groups of concern to ECRI, and the Ukrainian Parliament Commissioner for Human Rights, while respecting the institution's independence.

40. Despite the lack of appropriate hate speech data, the ECRI delegation heard from several interlocutors during its 2025 visit that the incidence of hate speech in the country appears to have decreased since the start of the full-scale war of aggression. At the same time, some reports indicate that the groups most targeted by hate speech based on the grounds covered by ECRI appear to be LGBTI persons and Roma.⁶⁸
41. LGBTI-phobic hate speech is indeed regularly reported by civil society actors, which generally point to various forms of hate speech, ranging from insults and stereotyped language to verbal abuse and death threats. Websites and social media platforms of extremist and conservative religious groups reportedly create and disseminate LGBTI-phobic material, for example by associating LGBTI people to paedophilia or depicting them as a threat to Ukrainian identity. Events organised by LGBTI organisations are often targeted and vandalised by such groups, frequently accompanied by discriminatory and threatening language.⁶⁹ On a positive note, ECRI was informed that broadcast and print media in Ukraine generally demonstrate a fair and professional portrayal of LGBTI persons.
42. Antigypsyism also continues to be a concern and has reportedly manifested in the form of hate speech, particularly on social media, where Roma are often portrayed as a threat to public security or health.⁷⁰ Such rhetoric intensified during the election periods and the Covid-19 pandemic.⁷¹ On many occasions, violent attacks against Roma communities were preceded and followed by anti-Roma hate speech and threats on social media.⁷² ECRI welcomes reports suggesting a positive, albeit modest, shift in public perceptions of Roma in recent years, which is credited among others to the recognition of many Roma serving in the armed forces.⁷³ ECRI invites the authorities to continue encouraging the positive recognition of contributions made by those belonging to groups of concern to ECRI, such as Roma and LGBTI persons, to the country's defence, on equal terms with others, with a view to promoting greater inclusion and respect for diversity.⁷⁴
43. Some interlocutors met by the ECRI delegation during the 2025 visit pointed to a perceived improvement in societal attitudes towards Jewish people, even if antisemitic hate speech still occasionally occurs, especially online.⁷⁵ ECRI welcomes that representatives of the Ukrainian authorities, including from the highest political level, have spoken up against antisemitism and encourages them to continue to do so, in consultation with Jewish communities in Ukraine.⁷⁶
44. ECRI welcomes reports according to which societal perceptions of Crimean Tatars, most of whom are Muslim, have improved, in solidarity with their situation after

⁶⁸ See, among others: Council of Europe (2022a); Freedom House (2023).

⁶⁹ ILGA Europe (2025): 4-5; Nash Svit Center (2024): 13-15.

⁷⁰ ERRC (2023); UN CERD (2025): 8-9; UPCHR (2023): 131.

⁷¹ UPCHR (2020): 47; Institute of Mass Information (IMI) (2021, 10 March).

⁷² Many of violent incidents against Roma communities were reportedly carried out by extremist groups in a staged manner, often live streamed on social media. They were also preceded by warnings on Facebook and followed by hate speech after the attacks. See: ERRC (2023): 31.

⁷³ Roma Foundation for Europe (2024): 10; The Guardian (2024, 29 April); France 24 (2023, 9 March).

⁷⁴ For example, in 2023, a Roma soldier, Viktor Ilchak, received an award for bravery from the mayor of Uzhhorod. See: Ibid.

⁷⁵ Research also shows that attitudes towards Jews have slightly improved since 2013. See: KIIS (2023).

⁷⁶ Ukrainian officials and government agencies have condemned past and contemporary forms of antisemitism on the occasion of the commemoration of the International Holocaust Remembrance Day. See, among other examples: [Comment of the MFA of Ukraine on the International Holocaust Remembrance Day](#) (2025); [President honoured the memory of Holocaust victims](#); [On the 84th Anniversary of the Babyn Yar Tragedy, the President Honored the Memory of the Victims of the Nazis](#).

Russia's illegal annexation of Crimea in 2014.⁷⁷ There are also examples of high-level engagement between Ukrainian political leaders and Muslim communities. For instance, in March 2025, the Ukrainian President attended a state Iftar (fast-breaking meal in Ramadan days) alongside Muslim servicemen, representatives of the Crimean Tatar Mejlis, and religious leaders.⁷⁸ However, according to a number of interlocutors met by the ECRI delegation during its visit, anti-Muslim hate speech occurs, mostly online, with its incidence increasing since the Hamas attack against Israel in October 2023 and Israel's subsequent war in Gaza. Beyond that, there have been isolated anti-Muslim incidents, including the vandalism of a mosque in April 2024.⁷⁹ This is a concern to ECRI. Therefore, ECRI encourages the authorities to pursue their cooperation with various segments of the Muslim community in order to better understand and respond to their concerns regarding anti-Muslim hatred.

45. ECRI is concerned about reports according to which Jehovah's Witnesses have occasionally been subject to hate speech, including verbal abuse and vandalism of their places of worship. According to information made available to ECRI, hate speech against Jehovah's Witnesses is sometimes accompanied by narratives portraying them as "anti-Ukrainian" or insufficiently patriotic due to their conscientious objection to military service.⁸⁰ Reference is made in this regard to section III.B. of the present report.
46. ECRI recommends, as a matter of priority, that the Ukrainian authorities conduct awareness-raising campaigns across the country with a view to preventing hate speech, including online hate speech, against groups of concern to ECRI, in particular LGBTI persons and Roma, by stressing the importance of diversity and tolerance in society, in cooperation with relevant civil society actors.
47. While fully acknowledging the complex and sensitive social climate resulting from the Russian Federation's war of aggression against Ukraine, ECRI is nonetheless concerned about reports of social distance between the general population and Ukrainian citizens who identify as Russians by "nationality" (ethnic/national origin) or whose first language is Russian. According to a survey conducted by KIIS in October 2024, 39.1% of respondents would accept Ukrainian citizens who identify as being of Russian "nationality" as "family members, friends, neighbours, or colleagues", 29.2% would accept them as residents of Ukraine, and 19.6% would not allow them into the country at all.⁸¹ ECRI takes note of certain views according to which these negative sentiments are largely rooted in, or directed primarily at the Russian Federation and supporters of the war of aggression against Ukraine, rather than being based on ethnicity or language as such. Nonetheless, ECRI underlines that preventing negative sentiments towards Ukrainian citizens who identify as Russian by "nationality" or whose first language is Russian is crucial for the promotion of a peaceful and inclusive Ukrainian society. ECRI further notes that the vast majority of them identify as Ukrainians and strongly oppose the Russian Federation's war of aggression against Ukraine.⁸² ECRI invites the authorities to take any preventive action, in consultation, where appropriate, with

⁷⁷ Council of Europe (2022a). More generally on Crimean Tatars' struggle for human rights, see: Council of Europe Commissioner for Human Rights (2023).

⁷⁸ United24 Media (2025, 14 March), [Zelenskyy shares Iftar with Muslim soldiers, exposing Russia's war on religion](#).

⁷⁹ On his social media, the Mufti of the Religious Administration of Muslims of Ukraine "Ummah" [reported](#) that vandals had painted a swastika and the neo-Nazi symbol "1488" on the wall of the mosque of the Al-Masar Islamic Cultural Centre in Odesa in April 2024. He stated that he had the "feeling that this [was] a deliberate Russian provocation aimed at inciting inter-religious hatred in the city". The community reportedly submitted a complaint to the National Police.

⁸⁰ European Association of Jehovah's Witnesses (2025); UN OHCHR (2024): 21-22.

⁸¹ According to KIIS, this represents a positive development compared to data from March 2023, as there are 10 percentage points more people who are ready to let Ukrainian nationals of Russian ethnicity into their closest social circle, while the number of those who stated that they "would not let them into Ukraine" is 7 percentage points lower. See: KIIS (2025).

⁸² KIIS (2025); The Conversation (2025, 21 May).

the communities concerned, in the light of its 2021 statement on preventing and combating ultra-nationalistic and racist hate speech and violence in relation to confrontations and unresolved conflicts in Europe.⁸³

48. Regarding media regulation, ECRI welcomes that the Law on Media entered into force on 31 March 2023, which among others prohibits hate speech and incitement to hatred in mass media and on video-sharing platforms under several grounds, including sexual orientation and gender identity.⁸⁴ The National Council on Television and Radio Broadcasting (NCTRB), an independent and collegial public entity, is the regulatory body responsible for enforcing the law. For example, in 2024 and 2025, the NCTRB found a violation of Article 36 of the Law on Media (incitement to hatred, hostility or cruelty against individuals or groups) in different publications of the same media targeting LGBTI persons.⁸⁵ The NCTRB issued a fine against that media outlet in June 2025 for failing to remove such publications, the first decision of this type regarding LGBTI-phobic content.⁸⁶
49. ECRI is pleased to note that the NCTRB signed a memorandum for cooperation with the UPCHR and consulted civil society organisations in its work.⁸⁷ The NCTRB has also developed criteria for identifying material that may incite hatred, violence or discrimination on several grounds.⁸⁸ ECRI considers this a **good practice** and trusts that the NCTRB will be provided with sufficient resources to effectively carry out all its functions in the area of preventing and combating hate speech.
50. ECRI reminds the authorities that politicians and public officials, given their position of influence, play a key role in promoting a culture of inclusion and respect for diversity and must condemn hate speech firmly and promptly. They also carry particular responsibility to avoid disseminating or engaging in hate speech or divisive language. ECRI is pleased to note that interlocutors met during its 2025 visit believe that hate speech in the political sphere is not widespread, even if isolated incidents occur. For example, ECRI was informed of concerning statements from a mayor who ordered the forced removal of Roma to Zakarpattia during the pandemic in 2020.⁸⁹ ECRI invites the authorities to support and promote self-regulation by elected bodies and political parties, for example through the adoption of codes and rules of conduct, including at the Ukrainian Parliament, and in this context, encourages all political parties to sign the updated Charter of European political parties for a non-racist and inclusive society, which places a particular emphasis on self-regulation and accountability.⁹⁰

B. Hate-motivated violence

51. Article 67 (1) (3) of the Criminal Code provides that “the commission of a criminal offence on the grounds of racial, national, or religious hatred or discord (...)” shall

⁸³ [Statement](#) adopted by ECRI at its 85th plenary meeting (30-31 March 2021).

⁸⁴ Law on Media ([no. 2849-IX](#)), adopted on 13 December 2022.

⁸⁵ In 2024, the National Council issued a [decision](#) regarding the publication of the online article “LGBT Movement and Paedophilia: Historical Connection” published by the movement “All Together!”. It found a violation of Article 36 of the Law on Media and ordered the deletion of the material. This decision was appealed before the Kyiv District Administrative Court and was still pending at the time of the 2025 visit. Other decisions were taken against the same organisation for LGBTI-phobic material (see, for example, [Decision No. 1623](#)).

⁸⁶ Gender Stream, [A First in Ukraine: Online Media Fined for Homophobic Publication](#).

⁸⁷ UPCHR (2024a): 235-236.

⁸⁸ See, for example, the [proposed criteria](#) under the grounds of sexual orientation and gender identity.

⁸⁹ In April 2020, the mayor of Ivano-Frankivsk was heard on video demanding to know why Roma had not yet been moved to Zakarpattia and ordering that those who refused to go “be packed and taken away”. See: Human Rights in Ukraine (2020, 23 April); Ukrainian News (2025, 20 January).

⁹⁰ See: Parliamentary Assembly of the Council of Europe (PACE), [Charter of European political parties for a non-racist and inclusive society](#) and [PACE Resolution 2443 \(2022\)](#) on “The role of political parties in fostering diversity and inclusion: a new charter for a non-racist society”. See also in relation to this issue in Ukraine: Council of Europe (2022b): 20; 29.

be considered an aggravating circumstance when imposing penalties.⁹¹ There continues to be, however, several gaps in the country's hate crime legislation. A matter of particular concern to ECRI is that the list of protected grounds remains limited and does not explicitly include, for example, ethnic origin, colour, sexual orientation, gender identity, and sex characteristics. Another challenge is the inconsistent use of terminology in relevant criminal provisions, which leads to legal uncertainty in the interpretation and application of the law.⁹²

52. Another shortcoming brought to the attention of ECRI is the procedural framework for prosecuting hate crimes. Article 161 of the Criminal Code requires that an official complaint be made for prosecution, meaning such offences cannot be prosecuted *ex officio*. Similarly, Article 67 (1) (3) does not guarantee that hate crimes are systematically prosecuted *ex officio*, since this would depend on the underlying offence itself.⁹³ It appeared from the ECRI delegation's findings during the 2025 visit that this was a significant obstacle to prosecuting hate crimes effectively. It follows that the consideration of a hate element depends on whether it was properly identified and recorded by police officers at the time of registration of a complaint, subsequently reflected in the pre-trial investigation, supported by sufficient evidence and included in the prosecution.
53. ECRI takes positive note that the Ukrainian authorities have acknowledged these challenges and have committed to undertaking legislative reform to address them.⁹⁴ The above-mentioned Draft Law No. 13597, which was tabled in Parliament in August 2025, could lead, for instance, to the extension of the protected grounds, the possibility to prosecute hate crimes *ex officio*, and clarifying terminology.⁹⁵
54. ECRI recommends that the Ukrainian authorities pursue their efforts, in consultation with civil society actors, to propose or support legislative amendments to the criminal and other relevant legislation to ensure that such amendments (i) explicitly include sexual orientation, gender identity, sex characteristics, ethnic origin, and colour in the list of protected grounds, and (ii) permit the *ex officio* prosecution of hate crimes. In doing so, due regard should be paid to the Recommendation CM/Rec(2024)4 of the Committee of Ministers of the Council of Europe on combating hate crime. If necessary, Council of Europe support should be sought.
55. According to information provided by law enforcement agencies, 156 criminal offences were recorded in 2024 under Article 161 (against 150 in 2023).⁹⁶ As regards prosecution, the Prosecution Service keeps statistics on open criminal proceedings, but it does not necessarily distinguish hate crimes from other crimes. When it comes to the judiciary, ECRI was informed that there were 55 court decisions in relation to Article 161 from 2022 to 2024. At the same time, it learned that more than half of court decisions were based on plea agreements.⁹⁷ As a

⁹¹ Article 67(1) of the [Criminal Code](#). Moreover, committing certain crimes "for reasons of racial, national or religious intolerance" is considered as aggravating circumstances for murder (Article 115(2)(14)), intended grievous bodily injury (Article 121(2)), intended bodily injury of medium gravity (Article 122(2)), battery and torture (Article 126(2)), torture (Article 127(2)), and threat to kill (Article 129).

⁹² For example, specific offences on aggravating circumstances use the term "for reasons of racial, national or religious intolerance", Article 161 refers to terms such as "enmity and hatred", and Article 67 to "hatred or discourse". See: Council of Europe (2022b): 30.

⁹³ Coalition of CSOs (2025): 498.

⁹⁴ See, for example, the [Action Plan](#) published in October 2025 as part of the communication from Ukraine concerning the group of cases of Fedorchenko and Lozenko v. Ukraine (Application No. 387/03).

⁹⁵ Ukraine, [Draft Law No. 13597](#) on amendments to the Code on Administrative Offences and the Criminal Code regarding the fight against discrimination. See also: ZMINA (2025, 14 October), [Draft Law No. 13597 may become a step towards European standards in the field of equality, but it needs further refinement](#).

⁹⁶ Ukraine did not provide complete hate crime data to OSCE/ODIHR for the years 2021-2023. In this connection, see: OSCE/ODIHR, [Hate Crime Report: Ukraine](#).

⁹⁷ See: Coalition of CSOs (2025): 499.

result, it is difficult to track hate crime cases across the justice system and key information and evidence pertaining to the identification of hate elements of a crime may be lost at different stages.⁹⁸ ECRI strongly encourages the Ukrainian authorities to develop a comprehensive system for registration and collection of appropriately disaggregated hate crime data.

56. ECRI's findings during the 2025 visit also suggest that many hate crime incidents are classified and prosecuted under ordinary offences such as hooliganism or minor bodily injury. In this connection, in a number of instances, the European Court of Human Rights found that Ukraine had failed to abide by its obligation to carry out effective investigations and unveil racist and LGBTI-phobic motives behind incidents.⁹⁹ Such shortcomings risk undermining confidence among victims and affected communities in the authorities' commitment and capacity to protect them against hate crimes, which may in turn discourage or further deter them from reporting incidents and seeking protection.
57. ECRI positively notes the increasing number of trainings and ad hoc activities for the relevant authorities, including police officers, aimed at improving their capacity to identify hate elements and investigate hate crimes, as well as to build stronger relations with groups of concern, such as LGBTI persons.¹⁰⁰ Moreover, the Ministry of Internal Affairs and the National Police cooperated with the Council of Europe and the OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR) to improve awareness and skills among law enforcement officials and prosecutors when it comes to investigating and prosecuting hate crimes. In 2019, the authorities collaborated with the OSCE/ODIHR to develop and publish a guide on categorising and investigating hate crimes. A practical tool for police officers on how to identify bias indicators was also published.¹⁰¹ These are very positive initiatives. However, ECRI notes that more needs to be done to ensure that hate crimes are properly recorded, investigated, prosecuted and eventually sanctioned.
58. ECRI recommends that the Ukrainian authorities take further steps to ensure that hate crimes are adequately registered, investigated and prosecuted, including by (i) adopting clear operational guidelines or protocols on identifying and recording hate elements of crimes; (ii) providing tailored and practical training on this issue to police and other criminal justice actors, making it a compulsory part of their initial and continuous training; (iii) ensuring that operational guidelines or protocols are integrated into everyday case management, with a clear obligation for police officers and prosecutors to consider hate elements in each case and to record the victim's perception of any hate element. In this context, due account should be taken of the Recommendation CM/Rec(2024)4 of the Committee of Ministers of the Council of Europe on combating hate crime. If necessary, further Council of Europe support should be sought.
59. It appears from ECRI's findings during the visit that underreporting of hate crimes remains an issue in Ukraine. Hate crime victims often hesitate to report to law enforcement officials and lodge official complaints due to fear of secondary victimisation or a lack of trust in the effectiveness of the criminal justice system.¹⁰²

⁹⁸ Council of Europe (2020): 11.

⁹⁹ See, e.g., [Karter v. Ukraine](#) (application no. 18179/17, 11 April 2024) in relation to a homophobic attack and [Uzu v. Ukraine](#) (application no. 7164/18, 21 November 2024) related to a racist assault against a child of Afro-Ukrainian descent. Both cases remain under the supervision of the Committee of Ministers of the Council of Europe as part of the group of cases of [Fedorchenko and Lozenko v. Ukraine](#) concerning ineffective investigations of hate crimes in Ukraine. See related concerns shared by civil society organisations, such as Gender Stream et al (2025).

¹⁰⁰ OSCE/ODIHR (2024a). See also the initiatives listed in the [Action Plan](#) as part of the communication from Ukraine concerning the group of cases of Fedorchenko and Lozenko v. Ukraine (application no. 387/03).

¹⁰¹ OSCE/ODIHR (2019a); OSCE/ODIHR (2019b).

¹⁰² See also Coalition of CSOs (2025): 890; 499, and Council of Europe (2022a): 38.

ECRI aligns with the views shared by civil society actors that enhancing communication between the police and the communities concerned, as well as fostering a more empathetic approach among police officers, are critical steps towards improving reporting rates.¹⁰³ In this connection, for example, ECRI welcomes the fact that some police officers have established direct contact with LGBTI organisations to ensure security during events like pride parades. ECRI encourages the authorities to build on such initiatives to establish a framework for dialogue and co-operation between police officers and groups of concern to ECRI.

60. During ECRI's 2025 visit to Ukraine, several interlocutors met by the delegation considered that violent hate crimes, while still occurring, have become less frequent since the onset of the full-scale war of aggression. However, ECRI remains concerned about a number of hate incidents affecting groups of concern to ECRI, particularly Roma and LGBTI persons in recent years.¹⁰⁴ For example, a transgender soldier was assaulted in Lviv in August 2023, which led to the first-ever conviction of a LGBTI-phobic assault as a hate crime under Article 161 of the Criminal Code.¹⁰⁵ It is also of particular concern to ECRI that some of the hate incidents concerned were reportedly organised and carried out by extremist groups, as was apparently the case, for instance, of the series of violent attacks against Roma communities in several cities in 2018.¹⁰⁶ A more recent incident took place in October 2021, when around 50 people deemed extremists, some carrying flaming torches, reportedly went door to door in Irpin chanting hateful slogans and calling for violence against local Roma residents.¹⁰⁷ ECRI is also concerned about reports from civil society actors that there were deficiencies in the investigations into these incidents, and that many perpetrators have not been held accountable.¹⁰⁸
61. ECRI recommends that the Ukrainian authorities further strengthen their efforts to detect, investigate and prosecute organised extremist activity, including by ensuring that police and other law enforcement agencies explore links between hate incidents and extremist organisations. If necessary, dissuasive and deterrence measures should be further introduced to counter violent extremism and hate groups.
62. Hate crime victims have the same legal status as other victims of crimes. They mostly rely on support provided by civil society organisations.¹⁰⁹ In December 2024, Law No. 4133-IX amended legal provisions on the right to free legal aid and expanded the list of beneficiaries to victims of hate crimes. However, ECRI regrets that the list of protected grounds is limited and does not include sexual orientation, gender identity, and sex characteristics, for instance. In addition, ECRI was informed that the law will only enter into force one year after the termination of the martial law. It supports the recommendations made by the UPCHR and civil society actors according to which the Ministry of Justice should submit a draft law to the Cabinet of Ministers in order to include victims of hate crimes based on the grounds of sexual orientation and gender identity in the list of persons entitled to free legal aid.¹¹⁰ ECRI takes positive note that the government has committed to do so by the

¹⁰³ Council of Europe (2020): 24-25.

¹⁰⁴ For example, in 2024, the monitoring network of the NGO Nash Svit Center documented 75 such cases. Of these, 36 contained information indicative of a hate crime, and 31 involved physical violence of varying severity. See: Nash Svit Center (2025): 28-29.

¹⁰⁵ In November 2023, a District Court issued a sentence regarding a homophobic attack and, for the first time, applied Article 67 of the Criminal Code (i.e., it recognised as an aggravating circumstance the commission of the offence "on the basis of sex", which was considered to implicitly include sexual orientation). See: Nash Svit Center (2025): 33.

¹⁰⁶ European Roma Rights Centre (ERRC) (2018); New York Times (2018, 21 July); The Guardian (2018, 27 August); Amnesty International (2019). See also: ERRC (2021); UN CERD (2025): 9.

¹⁰⁷ Human Rights Watch (2021); ERRC (2021).

¹⁰⁸ ERRC (2018); Amnesty International (2019); UN CERD (2025): 9.

¹⁰⁹ Council of Europe (2022b): 19.

¹¹⁰ UN CERD (2025): 5-6; Coalition of CSOs (2025): 499-501.

second quarter of 2026.¹¹¹ In this connection, ECRI encourages the authorities to review free legal aid arrangements to ensure that they include all victims of racist and LGBTI-phobic crimes and that such victims benefit from such arrangements, at all times, whenever the interests of justice so require.

III. INTEGRATION AND INCLUSION

A. Migrants

63. While some research and data are available, ECRI notes that it was generally difficult to get a comprehensive picture of the situation regarding the integration and inclusion of migrants since the start of the full-scale war of aggression.¹¹² ECRI further notes the challenges faced by Ukraine in securing the necessary resources and implementing integration measures for migrants in times of war.
64. At the policy level, the Strategy of State Migration Policy of Ukraine (2017-2025) recognises the integration of migrants as an area requiring state policy attention. Its Action Plan (2024-2025) included, among other initiatives, the carrying out of an analysis of policies and legislation related to the integration of migrants.¹¹³ ECRI notes, however, that Ukraine lacks a clear, dedicated policy framework on the integration of migrants, as highlighted by the United Nations Committee on the Elimination of Racial Discrimination (UN CERD).¹¹⁴ Civil society actors have also expressed concern about a perceived lack of public initiatives to support migrants' integration, insufficient capacity of the State Migration Service (SMS) in this area, and contradictions between laws, by-laws and the practices of the migration authorities, which are said to exacerbate the risk of social isolation and hinder migrants' effective access to their rights.¹¹⁵ In ECRI's view, the authorities, in particular those in charge of migration matters, should enhance their cooperation with civil society actors and international organisations working on migrants' integration and inclusion. This could be done, for example, through the creation of an advisory council on the matter, which should be meaningfully consulted in the development of integration measures.
65. ECRI recommends that the authorities develop and implement a dedicated policy framework for the integration and inclusion of migrants in Ukraine, encompassing all areas of social life. This should include concrete and measurable goals, with an accompanying timeline for their implementation and evaluation, as well as dedicated budget. In developing such a document, the authorities should draw inspiration from the Council of Europe's Model Framework for an Intercultural Integration Strategy at the National Level and organise meaningful consultations with relevant civil society actors and international organisations. If necessary, Council of Europe support should be sought.
66. As regards education, migrant children have the right to free education in state and local institutions providing preschool, primary school, secondary school and vocational education.¹¹⁶ In addition, a simplified access has also been put in place to ensure that refugee children can access relevant education when they lack documents attesting their previous qualifications. ECRI was informed, however, of

¹¹¹ See point 3.11 of the Roadmap on the Rule of Law adopted by the Cabinet of Ministers in May 2025, in the context of Ukraine's accession negotiations with the EU: Ukraine, Cabinet of Ministers, [Order No. 475-r](#), 14 May 2025.

¹¹² The full-scale war against Ukraine has significantly changed the number of and situation faced by migrants, asylum seekers and refugees in the country. At the time of the 2025 visit to Ukraine, it was unclear how many migrants resided in the country, but it was believed that there were around 70% less migrants than in 2022. See: Right to Protection (2023a). Regarding difficulties in accessing basic rights and livelihoods for refugees and asylum seekers since 2022, see: HIAS and Right to Protection (2023): 6-7.

¹¹³ Ukraine, [Strategy of State Migration Policy](#) and its [Action Plan \(2024-2025\)](#).

¹¹⁴ UN CERD (2025): 33-34.

¹¹⁵ See, e.g., the concerns in relation to insufficient measures for the integration of migrants in: Coalition of CSOs (2025): 799.

¹¹⁶ Ukraine, Article 53 of the [Constitution of Ukraine](#). This right is further defined and reinforced by the [Law on Education](#), which provides additional guarantees for access to and inclusion in the national education system.

continued challenges as regards insufficient support for language-learning in schools, the need for better intercultural communication and respect for cultural diversity in some educational settings, and the demand for stronger educational support programmes for migrant children.¹¹⁷ ECRI encourages the authorities to issue support materials and to provide training to teachers and other relevant educational professionals on how to ensure the integration and inclusion of migrant pupils, including in relation to relevant language-learning.

67. More generally, it appeared during the 2025 visit that there was growing attention to the promotion of and opportunities for learning Ukrainian in the general population.¹¹⁸ In this context, ECRI was informed that there are free language courses for migrants organised by various organisations. At the same time, these are not state-run and their availability and scope vary.¹¹⁹ For example, the NGO The Tenth of April implements the RIKA Project, which consists of a network of language-learning and integration clubs where participants can learn Ukrainian and the country's history and culture.¹²⁰ ECRI considers it a **good practice**.
68. In the field of employment, asylum applicants and migrants with a temporary residence permit can be employed on the basis of permissions issued by the State Employment Service of Ukraine (SESU). ECRI welcomes the changes implemented in 2022 that, according to ECRI's findings during the visit, have facilitated migrants' access to work, including the removal of the provision requiring a minimum salary level for employing migrants.¹²¹ ECRI was also informed of a new digital platform by the SESU aimed at facilitating migrants' access to work. However, ECRI notes that asylum seekers are not entitled to seek assistance from the SESU, despite having the right to work upon obtaining a permit, which reduces possibilities of finding a job. ECRI encourages the authorities to support the integration and inclusion of migrants in the workforce, especially in the context of the growing recognition of the need and opportunities to attract migrants to participate in the reconstruction of Ukraine.¹²²
69. With regard to housing, the Draft Law on Basic Principles of Housing Policy was submitted to the Parliament in January 2025 for consideration. It would apply equally to Ukrainian citizens, migrants, refugees and stateless persons who legally reside in Ukraine, extending to them the right to social housing.¹²³ While the draft law was still pending at the time of the 2025 visit, ECRI considers this a promising step. On a different note, Temporary Accommodation Centres (TACs) are available for refugees and registered asylum seekers who are unable to secure housing on their own.¹²⁴
70. Access to healthcare for migrants depends on their legal status. ECRI is concerned that asylum seekers are only entitled to emergency care and must reimburse the full cost of services and medicines provided.¹²⁵ This can be a substantial barrier for

¹¹⁷ See, for example: Right to Protection (2025): §§ 43-45.

¹¹⁸ For instance, in March 2024, the Cabinet of Ministers adopted a National and Cultural Programme for the period until 2030, which, for example, determines the development and creation of a network of Ukrainian language courses (including online courses). In this connection, ECRI also refers to the work of the Advisory Committee of the Framework Convention for the Protection of National Minorities.

¹¹⁹ Coalition of CSOs (2025): 800.

¹²⁰ There are 32 conversational-integration clubs across seven regions. See: The Tenth of April, [RIKA Project](#); [2024 Annual Report](#).

¹²¹ Other changes include the extension of the right to work to those whose initial request for document processing was rejected by the SMS but who have appealed the decision before courts, and the removal of the requirement to submit a passport when applying for a work permit, with an asylum certificate or other asylum-related documents now being sufficient. See: Ukraine, [Law on Employment of Population](#).

¹²² See, in particular: Right to Protection (2023b).

¹²³ Ukraine, [Draft Law No. 12377](#) on the Basic Principles of Housing Policy.

¹²⁴ For more details, see Right to Protection (2025): 8.

¹²⁵ Ukraine, Cabinet of Ministers, [Decree No. 121](#), 19 March 2014; ECRE (2025).

asylum seekers as financial constraints may deter them from accessing emergency and other necessary healthcare services, pushing them to delay or forego treatment. ECRI strongly encourages the authorities to review the existing arrangements for the provision of healthcare to asylum seekers who are legally present in Ukraine to ensure that they have effective access to essential health services, including primary and emergency care.

71. It was also reported to ECRI that shortcomings in the asylum process have impacted the integration prospects of asylum seekers.¹²⁶ According to civil society actors, at the time of the 2025 visit, it remained difficult to apply for international protection. Refusals to register or process applications were said to be often not accompanied by written notice or legal reason.¹²⁷ In addition, ECRI's attention was drawn to the specific situation of nationals of Belarus and the Russian Federation who had to seek asylum in the country and often reportedly had their applications rejected by the SMS on the sole basis of citizenship, without proper individualised assessment.¹²⁸ While acknowledging the complex and sensitive context of the war of aggression against Ukraine, ECRI invites the authorities to address the concerns raised by the UN CERD on these matters.¹²⁹

B. Roma

72. At the time of the 2025 visit, there was consensus amongst interlocutors met by the ECRI delegation that Roma continued to be one of the most marginalised groups in Ukraine and that their situation had deteriorated since the start of the full-scale war of aggression.¹³⁰ From the outset, ECRI notes that the integration and inclusion of Roma is closely linked to the national framework on national minorities in Ukraine. For this reason, ECRI refers to the work of the Advisory Committee on the Framework Convention for the Protection of National Minorities (AC FCNM), which also conducted a separate monitoring visit to Ukraine in September 2025, as part of its sixth monitoring cycle.¹³¹
73. ECRI is pleased to note that important legislative and policy developments took place in Ukraine in relation to Roma inclusion in recent years, such as the adoption of a National Roma Strategy until 2030 and related action plans, the development of the National and Cultural Programme "Unity in Diversity", and the passing of the Law on National Minorities in 2023.¹³² The National Roma Strategy covers a wide range of areas and designates the State Service for Ethnic Policy and Freedom of Conscience (DESS) as its central executive body, with regional authorities being responsible for developing policies. At the same time, ECRI notes the concerns shared by several civil society actors that the Strategy does not comprehensively address the needs of Roma and does not sufficiently tackle antigypsyism.¹³³ ECRI strongly encourages the authorities to allocate dedicated funds for the

¹²⁶ See: Coalition of CSOs (2025): 821-826. Moreover, the UN CERD, in its 2025 concluding observations, expressed concerns for the reported poor living conditions in reception centres for asylum seekers as well as barriers they face in enjoying their rights owing to the lack of recognition of documents issued to asylum-seekers as valid identity documents. UN CERD (2025): 33-34.

¹²⁷ Right to Protection (2025): 3-4; Coalition of CSOs (2025): 824-826; HIAS and Right to Protection (2023): 4.

¹²⁸ ECRE (2025): 18-19; UN CERD (2025): 33-34; ZMINA (2022).

¹²⁹ UN CERD (2025): 33-34.

¹³⁰ UN CERD (2025): 7-9; UPCHR (2025b); UPCHR (2024a); UPCHR (2024b): 127; European Commission (2024): 43; Voice of Romni (2024a).

¹³¹ See: AC FCNM, [Ukraine: visit of the Advisory Committee on the Framework Convention for the Protection of National Minorities](#).

¹³² In 2021, Ukraine adopted the "Strategy for facilitating the realisation of the rights and opportunities of persons belonging to the Roma national minority in Ukrainian society for the period until 2030" ([National Roma Strategy](#)). In July 2023, the National Roma Strategy was renewed. In December 2023, the [Action Plan for 2024-2025](#) was adopted. The "United in diversity" programme was [adopted](#) in September 2023. Adopted in December 2022, Law [No. 2827-IX](#) on National Minorities entered into force on 1 July 2023. ECRI takes note that the integration and inclusion of Roma is also closely linked to the national framework on national minorities in Ukraine and therefore refers to the work of the AC FCNM.

¹³³ See also the [outcome](#) of the consultations on the National Action Plan for the Roma Strategy organised by the Council of Europe and DESS in October 2025. See also: ARCA (2024): 15-17; Coalition of CSOs (2025): 524.

implementation of Roma-specific policies and initiatives, to ensure effective coordination between efforts by national, regional and local authorities and to fulfil their commitment to establishing “Roma advisors” for the implementation of relevant policies at regional and local levels.¹³⁴

74. It emerged from ECRI’s findings during the 2025 visit that the lack of identity documents was still one of the most acute problems faced by Roma in Ukraine.¹³⁵ The full-scale war of aggression has not only led to more Roma losing their documents but has also exacerbated the challenges undocumented Roma face, particularly those who are internally displaced persons (IDPs). Against this background, ECRI praises the pilot project initiated by the UPCHR in 2024 that led to over 300 Roma being provided with IDs in a short period of time.¹³⁶ The project involved proactive outreach to Roma communities and stronger cooperation between the UPCHR, civil society, local and regional authorities and Roma communities. In ECRI’s view, this project can be considered a **good practice**.
75. The ECRI delegation observed for itself, during its 2025 field visit to Mukachevo (Zakarpattia region) the many challenges faced by Roma IDPs or undocumented for other reasons. The ECRI delegation also learned that Roma in a similar situation in Zakarpattia and other Ukrainian regions are most often not in a position to benefit from available state support in practice and regularly experience additional difficulties in their attempts to access social services, job opportunities, housing, education and healthcare services.¹³⁷ This is a particular concern to ECRI.
76. In light of the above, ECRI takes due note of the establishment of an Interagency Working Group to coordinate the broader implementation of the National Roma Strategy,¹³⁸ as well as measures planned and adopted by the Cabinet of Ministers, before and after ECRI’s 2025 visit, to simplify existing procedures and make administrative services more accessible.¹³⁹ These are clearly steps in the right direction. At the same time, the information gathered by ECRI suggests that, in order to address this longstanding issue, there is a need for setting up a dedicated, task-oriented and inclusive mechanism capable of proactively reaching out to undocumented Roma, including hard-to-reach individuals and families, providing tailored support and facilitating the handling of complex cases. ECRI is convinced that, drawing on the positive developments and the good practice identified above, such an initiative would help the authorities ensure more effective implementation on the ground.
77. ECRI recommends, as a matter of priority, that the Ukrainian authorities create a task force involving representatives of relevant ministries and services, regional and local authorities, civil society organisations and the Ukrainian Parliamentary Commissioner for Human Rights, aimed at proactively identifying and supporting Roma in need of proper identification documents, including by further simplifying

¹³⁴ Point 2.1.1. of the Action Plan on the protection of the rights of people belonging to national minorities (communities) of Ukraine.

¹³⁵ No official data is available on the scale of the problem of lack of IDs among Roma. However, according to rough estimates, there are 30,000 Roma in Ukraine without personal documents. See: UPCHR (2024b): 129-134; OSCE/ODIHR (2024b): 10.

¹³⁶ During 2024, the pilot project “Documentation of persons from the Roma national minority and development of legal mechanisms to simplify this procedure” was initiated in Mukachevo, in the Zakarpattia region, by the UPCHR in a collaborative effort with the State Migration Service, UNHCR, and the NGO Chiricli. See: UPCHR (2025b): 9-10; UPCHR (2024b): 133-134.

¹³⁷ OSCE/ODIHR (2024b): 10. The situation in Zakarpattia is particularly problematic: only one quarter of Roma IDPs are reported to have had access to IDP registration, compared to 90% in the rest of Ukraine. See: Roma Foundation for Europe (2024): 4.

¹³⁸ Ukraine, Cabinet of Ministers [Resolution No. 468](#) of 19 April 2022.

¹³⁹ For instance, relevant measures were planned under the action plan adopted by the Cabinet of Ministers in May 2025, in the context of Ukraine’s accession negotiations with the EU (Cabinet of Ministers, [Order No. 475-r](#)). Moreover, ECRI was informed that, in December 2025, the Cabinet of Ministers adopted [Resolution No. 1709](#), amending procedures related, inter alia, to the issuance of documents and prescribing measures to simplify such procedures and improve the mobility of relevant administrative services, particularly for making these services more accessible to persons in remote or conflict-affected areas.

administrative procedures and by ensuring targeted support to overcome administrative barriers, where necessary.

78. During its field visit to Mukachevo, the ECRI delegation also met with Roma mediators working in an NGO-run centre that provides support to Roma in obtaining IDs. This experience exemplified the vital role mediators can play in bridging between Roma communities and the authorities. Therefore, ECRI is concerned about the low number of Roma mediators as, reportedly, there are only about 20 of them across Ukraine, mostly funded by the NGO Chiricli.¹⁴⁰ The authorities informed ECRI that Roma mediators are recognised in the “public registry of professionals” and that it is up to regional and local authorities to use their funds to hire them. ECRI strongly encourages the authorities to further institutionalise, scale up and adequately finance the work of Roma mediators.
79. Another matter of concern to ECRI is the reported inequality in the level of educational attainment for Roma. While data varies, around 20% of Roma are said to have no education, 25% do not know how to read and write in Ukrainian and only 1% have benefitted from higher education.¹⁴¹ Some reports indicate that Roma women and girls are more likely to drop out of school.¹⁴² Other challenges reportedly faced by Roma pupils in schools are their lower level of preschool preparation, insufficient capacity for teachers to adapt to their specific needs and antigypsism in some schools.¹⁴³
80. It appeared during the 2025 visit that both the Covid-19 pandemic and the war of aggression against Ukraine had further exacerbated an already difficult situation for Roma children and young people in the area of education.¹⁴⁴ Roma children comparatively often face significant barriers to online learning, notably due to insufficient technical resources at their disposal and unreliable internet connections and electricity. The situation seems to be particularly concerning for Roma IDP children. During its field visit to Mukachevo, the ECRI delegation also heard of concerns that some Roma IDPs faced administrative challenges when trying to register their children in schools and have encountered prejudice and integration challenges in local communities, even in comparison to local Roma. ECRI takes positive note of a number of initiatives being implemented in this area, such as the Romany Early Years Network in Ukraine, which has carried out programmes to improve early-childhood education and to train school staff on inclusive practices for Roma children.¹⁴⁵ ECRI considers it a **good practice**.
81. It also appeared during the ECRI visit that some schools were predominantly composed of Roma pupils, particularly in the Zakarpattia region, thereby raising concerns about de facto Roma school segregation, which is partly linked to Roma residential segregation. Against this background, in April 2022, the Eighth Administrative Court of Appeal ruled in favour of a mother whose Roma children were denied access to an integrated school in Uzhhorod (Zakarpattia region) and were instead directed to attend a segregated, Roma-only school. Following this judgment, the Uzhhorod City Council changed the catchment-area division in the

¹⁴⁰ Roma Foundation for Europe (2024): 12.

¹⁴¹ This information was [provided](#) by the UPCHR in March 2023. In this connection, research conducted by the NGO Winds of Change in ten Roma communities in the Odesa and Mykolaiv regions shows that 68% of respondents were either completely illiterate or struggled with reading and writing, and 59% could not count or had significant difficulties. The reported situation as regards Roma women and girls was as follows: 34% never attended school, 49% only attended the first few grades, 10% had incomplete secondary education, and only 2% had completed higher education. See: Winds of Change (2024): 12-13.

¹⁴² See, among others: ARCA et al (2025): 6-7; Voice of Romni (2024b): 26-30; Winds of Change (2024).

¹⁴³ OSCE/ODIHR (2024): 12; Chiricli and ERGO Network (2025): 13.

¹⁴⁴ See: Roma Foundation for Europe (2024): 17; OSCE/ODIHR (2024): 12; Voice of Romni (2024a): 29-32; IRF (2023).

¹⁴⁵ The project [REYN Ukraine](#) was established in Ukraine in 2016 and is hosted by the NGO Blaho, which serves as its national coordinator and works with an extensive network of NGOs, experts, and local partners across the country.

region, allowing Roma families to enrol their children in the school of their choice.¹⁴⁶ ECRI welcomes this development. During its 2025 visit to Mukachevo, the ECRI delegation visited a Hungarian-language school, in which pupils were virtually all Roma. It gained the impression that, while there were challenges to support attendance particularly for Roma pupils living in compact settlements, there was willingness among school staff to address their specific needs. According to the authorities, the concentration of Roma pupils in some schools is influenced not only by residential patterns but also by the need to reflect their linguistic needs and preferences.¹⁴⁷

82. In the light of the above information and findings, ECRI considers it crucial for the authorities, at all administrative levels, to take resolute action to improve Roma inclusion in schools, especially in regions with significant Roma populations.
83. ECRI recommends that the Ukrainian authorities take action to ensure access to quality education for Roma children with a view to increasing school enrolment and combating drop-out, in particular by (i) implementing measures to support their access to online learning and mobile education facilities, (ii) financing and implementing specific educational programmes for Roma women and girls, and (iii) creating outreach initiatives to encourage school attendance to Roma children living in compact settlements, in close coordination with Roma mediators and the families concerned. If necessary, Council of Europe support should be sought.
84. ECRI notes with concern that the full-scale war of aggression has also impacted the inclusion of Roma in employment, with some data estimating an unemployment rate of about 75% among Roma. In addition, the lack of IDs for a large number of Roma also inhibits their access to formal employment. Antigypsyism in hiring practices is also said to be pervasive, and Roma are often confined to informal or seasonal work, thus lacking long-term financial security.¹⁴⁸ The authorities informed ECRI that a range of career-guidance services are available online, and that SESU officials visited compact Roma settlements on a number of occasions to explain the support and services available to them. However, ECRI regrets the current lack of targeted government programmes designed to improve Roma employment opportunities and their professional skills. It encourages the authorities to work alongside relevant civil society actors, Roma communities and mediators to implement tailor-made measures to improve access to employment for Roma, including measures targeting Roma women in particular.
85. Roma reportedly continue to face serious housing challenges, particularly those living in so-called “compact settlements”, shantytowns or informal housing without access to running water, electricity, heating or ownership documents. Roma IDPs are in a situation of great vulnerability and struggle to find housing for rent, reportedly due to financial constraints and discriminatory practices in particular. Roma who live in informal housing are also said to be very often unable to obtain compensation otherwise available for rebuilding damaged property.¹⁴⁹ During its 2025 field visit to Mukachevo, the ECRI delegation visited a Roma-led shelter, supported by the NGO Chiricli, which served as an example of the demand for specific initiatives for Roma IDPs. ECRI strongly encourages the authorities to support such activities and to work alongside regional and local authorities to significantly expand projects aimed at improving living conditions in “compact settlements”.

¹⁴⁶ European Roma Rights Centre (2022).

¹⁴⁷ As regards the issue of multilingualism in schools and how it impacts Roma pupils, reference is made to the work of the AC FCNM.

¹⁴⁸ ODIHR (2024): 13; Roma Foundation for Europe (2024): 12; ARCA (2024): 16-17; Chiricli and ERGO Network (2025): 14-15.

¹⁴⁹ ODIHR (2024): 7-9; Roma Foundation for Europe (2024): 11-14; ARCA (2024): 12; Chiricli and ERGO Network (2025): 18-19.

86. ECRI also learned that additional challenges persist in access of Roma to healthcare, in particular due to the lack of identity documents and insufficient financial means, which adversely affect access to essential healthcare services and medicines.¹⁵⁰ Nonetheless, ECRI was informed of progress made to improve Roma access to healthcare, including vaccination campaigns for Roma children and initiatives to strengthen the sexual and reproductive health of Roma women and girls. ECRI trusts that the authorities will reinforce their cooperation with civil society actors and mediators to address the practical obstacles Roma face when seeking healthcare, and to expand outreach medical services, including preventive care, to marginalised and remote Roma communities.

IV. TOPICS SPECIFIC TO UKRAINE

A. Anti-discrimination legislation

87. In its previous report on Ukraine (§§ 9-15), ECRI identified gaps in the anti-discrimination legislation. In addition to the lack of explicit recognition of sexual orientation and gender identity as protected grounds in criminal law, ECRI is concerned that administrative liability for discrimination under Article 16 of the Law on the Principles of Preventing and Counteracting Discrimination remains unenforceable, as the Code on Administrative Offences does not establish a corresponding administrative offence.¹⁵¹ As a result, proceedings cannot be initiated, nor can sanctions be imposed. ECRI was informed that Draft Law No. 13597, tabled in Parliament in September 2025, may address this gap.¹⁵² ECRI strongly encourages the authorities to support the adoption of appropriate legislative amendments in this respect.

B. Preventing and combating racism and intolerance within the National Police, State Border Guard Service and the Armed Forces

88. ECRI acknowledges the exceptionally difficult circumstances faced by the National Police, the State Border Guard Service and the Armed Forces in the context of the war of aggression by the Russian Federation against Ukraine. Their work, always essential, takes on even greater significance in this context. ECRI is pleased to note that, overall, Ukraine has taken steps to strengthen the promotion of human rights and equality within the work of these bodies.
89. As regards the National Police, the “Rules of Ethical Behaviours of Police Officers”, adopted in 2016, provides that a police officer on duty must show respect for the dignity of every person and treat them fairly and impartially, regardless of, for instance, “race”, religion or sexual orientation, and must not allow discrimination in any form.¹⁵³ ECRI is also pleased to note that a new, specialised human rights department was established within the National Police in 2021, notably to organise training activities and to monitor compliance with human rights standards, and that there were an increasing number of ad hoc trainings for police officers aimed at building their capacity on human rights and equality issues as well as on engaging with groups of concern to ECRI in recent years.¹⁵⁴ ECRI encourages the authorities

¹⁵⁰ ODIHR (2024): 7-9; Roma Foundation for Europe (2024): 10-11; ARCA (2024): 16; Chiricli and ERGO Network (2025): 16-17.

¹⁵¹ Ukraine, [Law on the principles of preventing and counteracting discrimination in Ukraine](#). See also: UPCHR (2023): 142-143; Coalition of CSOs (2025): 496.

¹⁵² Ukraine, [Draft Law No. 13597](#) on amendments to the Code on Administrative Offences and the Criminal Code regarding the fight against discrimination.

¹⁵³ Ukraine, [Order No. 1179](#) on the approval of the Rules of Ethical Conduct for Police Officers.

¹⁵⁴ By way of illustration, in April 2024 the NGO Gender Stream and the Department of Main Inspection and Human Rights Compliance of the National Police signed a Memorandum of Cooperation to develop guidelines for ethical communication with LGBTI people and to organise [training sessions](#) for police officers. In 2024, the UPCHR conducted three trainings for National Police officers aimed at helping them to prevent discriminatory practices and to build mutual understanding and trust between Roma communities and police officers. See: UPCHR (2025b): 9. A non-exhaustive list of related initiatives can also be found in the Ukrainian government's [action plan](#) on measures to comply with the ECtHR judgment in the case of Maymulakhin and Markiv v. Ukraine.

to build on these initiatives to develop regular training on issues of relevance to ECRI and to reinforce the National Police human rights department so that the promotion of equality and the prohibition of discrimination can be mainstreamed.

90. In spite of these positive developments, ECRI received a number of reports of incidents involving allegations of racist or LGBTI-phobic police misconduct.¹⁵⁵
91. Regarding the State Border Guard Service, ECRI learned about allegations, which attracted media attention and were subsequently documented by civil society actors and international human rights bodies, of racist misconduct on the part of certain state border guards against persons of African, Asian, Middle Eastern, and Latin American descent, in the immediate aftermath of the full-scale invasion of Ukraine.¹⁵⁶ ECRI notes that the Ukrainian authorities publicly challenged these allegations.¹⁵⁷
92. Another issue relates to reports of transphobic incidents involving state border guards at Ukrainian western borders.¹⁵⁸ In one such case from 2024, transgender women were allegedly prevented from leaving the country despite having completed the legal gender recognition process and possessing relevant documents. In another 2024 case, border guards allegedly said that the woman in question “did not look feminine enough”, accused her of document forgery, and addressed her using male pronouns. ECRI notes that the Ukrainian authorities described these as exceptional cases linked to unresolved military obligations.
93. Against this background, ECRI welcomes that “Rules of ethical and virtuous behaviour of State Border Guard Service staff”, which include provisions on preventing discrimination in the course of their activities, were adopted in November 2024.¹⁵⁹
94. As regards the Armed Forces, ECRI is pleased to note that recent steps were taken in the area of preventing and combating racism and intolerance, for example the creation of a new department on the protection of serviceperson’s rights and the operation of a hotline to receive complaints of misconduct, such as possible discrimination. ECRI also notes with satisfaction that, according to civil society actors, attitudes towards LGBTI servicepersons in the Armed Forces is considered as being “mostly tolerant if not friendly” and that homophobic attitudes and incidents, while they can occur,¹⁶⁰ do not have a structural or institutional nature and are generally followed by action to investigate the incidents, protect the victims and to address the situation more broadly.¹⁶¹
95. At the same time, ECRI is seriously concerned about allegations of mistreatment and physical abuse faced by a number of Jehovah’s Witnesses who were forcibly taken to military units. From March 2024 to June 2025, over 150 such incidents

¹⁵⁵ See, for example, on preventing and combating racial profiling by law enforcement officials: UN CERD (2025): 17-18. See also Nash Svit Center (2025): 32-35.

¹⁵⁶ UN CERD (2025): 29-30; United Nations (2022, 3 March). See also CNN (2022, 4 March); Al Jazeera (2022, 2 March); Telegraph (2022, 28 February); Time (2022, 1 March); France 24 (2022, 1 March).

¹⁵⁷ The Ministry of Foreign Affairs published a [statement](#) on social media regarding the reported incidents and indicated that there was no discrimination based on race, skin colour or nationality in border crossing efforts, and that officials followed the principle of giving priority to women and children and ensuring a first-come-first-served approach for others. See also: ZMINA (2022, 3 March).

¹⁵⁸ Nash Svit Center (2025): 11 and 34; ECOM (2024): 40; ILGA Europe et al (2022).

¹⁵⁹ Ukraine, [Order No. 741](#) on the approval of the Rules of Ethical and Virtuous Behaviour of Personnel of the State Border Guard Service.

¹⁶⁰ Four LGBTI-phobic incidents by members of the Armed Forces were recorded in 2024. See: Nash Svit Center (2025): 33-34; BBC (2024, 25 June).

¹⁶¹ Nash Svit Center (2022).

were reported. In addition to physical ill-treatment, reports point to widespread verbal harassment and threats motivated by religious intolerance.¹⁶²

¹⁶² European Association of Jehovah's Witnesses (2025); UN OHCHR (2024): 21-22. As regards the treatment of persons deprived of their liberty more specifically, reference is made to the work of the Council of Europe's Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT).

96. ECRI recommends that the authorities send a firm, regular message of zero tolerance for racism, religious intolerance, and LGBTI-phobia within the National Police, State Border Guard Service, and Armed Forces, including through suitable training and, where necessary, relevant instructions. In this connection, the authorities should make, where appropriate, public statements condemning racist and LGBTI-phobic incidents and make sure that any indications of such conduct by law enforcement officials or service personnel are effectively investigated.

C. Issues related to specific religious groups in the context of the full-scale war of aggression against Ukraine

97. One of the issues brought to ECRI's attention is the impact of military service obligations on certain religious minorities. At the outset, ECRI fully acknowledges the grave situation faced by Ukraine and its right to self-defence following the war of aggression by the Russian Federation, which has necessarily led to stricter conscription measures. At the same time, ECRI echoes the concerns of a number of civil society actors, the UPCHR and other international human rights bodies or agencies, such as the OHCHR,¹⁶³ of how the current mobilisation, under which conscientious objection has been ruled out, affects religious communities or some of their members who refuse armed and non-armed military service but who are nonetheless willing to perform alternative civilian service and contribute to their country's war effort.
98. Between January 2022 and December 2025, a total of 967 criminal proceedings were reportedly initiated against Jehovah's Witnesses under Article 336 of the Criminal Code (evasion of conscription for military service during mobilisation, for a special period, or for military service of reservists during a special period), which carries a prison sentence of up to five years. ECRI also learned that, out of these cases, 345 were submitted to court and that first-instance courts issued sentences in 47 cases. During the same period, 13 criminal proceedings were reportedly initiated and sent to court against Jehovah's Witnesses for "refusing military orders" (Article 402) and 44 criminal cases were initiated against Jehovah's Witnesses for "unauthorised abandonment of a military unit" (Article 407), which led or may lead to a sentence of up to ten years in prison, seven of them having been sent to court.¹⁶⁴ As a result of these proceedings or sentences, as of December 2025, one Jehovah's Witness is reportedly remanded in custody or serving a prison sentence, while seven cases were referred to court.
99. In October 2025, the Supreme Court ruled that the Ukrainian legislation does not provide any exemption from compulsory military service during mobilisation based on conscientious objection, while affirming that mobilisation does not remove the right to refuse to carry or use weapons and to perform only non-combat military duties.¹⁶⁵ In parallel, there are pending complaints before Ukraine's Constitutional Court pertaining to the existing restrictions on conscientious objection during wartime and the criminal penalties for refusing service on those grounds.
100. ECRI refers the Ukrainian authorities to the considerations of the Council of Europe's Venice Commission in its *amicus curiae* on alternative (non-military) service following a request by the Ukrainian Constitutional Court.¹⁶⁶ The Venice Commission considered that, while states have a margin of appreciation during a general mobilisation, the very nature of conscientious objection implies that it cannot be fully excluded in times of war. ECRI therefore encourages the authorities

¹⁶³ UN OHCHR (2024): 21-22; UPCHR (2024a): 85.

¹⁶⁴ The situation is said to have been particularly problematic following an information letter issued by the Prosecutor General's Office in August 2024 addressed to the heads of regional prosecution offices regarding the Supreme Court's legal position in its decision of 13 June 2024 in the case No. 601/2491/22 on the specificities of establishing the elements of the crime stipulated in Article 336 of the Criminal Code. See also: Jehovah's Witnesses (2025); European Association of Jehovah's Witnesses (2025).

¹⁶⁵ See the [press release](#) (in English) and the [decision](#) (in Ukrainian) of the Supreme Court in Case No. 573/838/24.

¹⁶⁶ Council of Europe, European Commission for Democracy through Law (Venice Commission) (2025).

to hold meaningful and regular consultations with Jehovah's Witnesses and any other relevant religious communities to address their concerns about conscientious objection and to make available non-military alternative service through which these communities can support Ukraine in times of war. In this regard, ECRI welcomes the authorities' commitment to develop and adopt a law to ensure the right to perform alternative service during martial law.¹⁶⁷

101. Another matter brought to ECRI's attention relates to legislative measures aimed at restricting or terminating the activities of religious organisations that are considered to be institutionally or canonically tied to a "centre of influence" located in a country engaged in an armed aggression against Ukraine.¹⁶⁸ ECRI notes that the law requires these organisations to sever such ties and only provides for the possibility of terminating their activities in the event of a refusal to comply with an order to remedy violations of the law, and that, by the time of ECRI's visit to Ukraine, no such organisation had been shut down. While fully acknowledging the complexity of the situation and the legitimacy of national security considerations in the context of the war of aggression against Ukraine, ECRI took note of reports from a number of civil society actors and international experts suggesting that such measures carry the risk of unduly challenging the equal treatment of believers belonging to the religious communities concerned in the exercise of their right to freedom of religion.¹⁶⁹ In this connection, ECRI was also made aware of concerns about potential growing societal mistrust towards all believers belonging to these communities. As a consequence, ECRI encourages the authorities to take action aimed at preventing any discriminatory treatment or any form of intolerance towards members of the religious communities affected by the application of the new law.

¹⁶⁷ See point 3.3 of the Roadmap on the Rule of Law adopted by the Cabinet of Ministers in May 2025, in the context of Ukraine's accession negotiations with the EU: Ukraine, Cabinet of Ministers, [Order No. 475-r](#), 14 May 2025.

¹⁶⁸ In August 2024, the Parliament adopted [Law No. 3894-IX](#) on the Protection of the Constitutional Order in the Activities of Religious Organizations. Following the entry into force of the law, the State Service for Ethnic Policy and Freedom of Conscience (DESS) conducted an investigation and gave the Ukrainian Orthodox Church of the Moscow Patriarchate (UOC-MP) nine months to sever canonical ties with Moscow or face possible court-ordered bans. In August 2025, the government considered that the UOC-MP failed to comply with the requested measures and petitioned a court to ban the activities of UOC-MP, in accordance with the above-mentioned law. The process was still ongoing at the time of the 2025 visit.

¹⁶⁹ United Nations (2025); Human Rights Watch (2024); UN CERD (2025).

INTERIM FOLLOW-UP RECOMMENDATIONS

The two specific recommendations for which ECRI requests priority implementation from the authorities of Ukraine are the following:

- (§ 46) ECRI recommends that the Ukrainian authorities conduct awareness-raising campaigns across the country with a view to preventing hate speech, including online hate speech, against groups of concern to ECRI, in particular LGBTI persons and Roma, by stressing the importance of diversity and tolerance in society, in cooperation with relevant civil society actors.
- (§ 77) ECRI recommends that the Ukrainian authorities create a task force involving representatives of relevant ministries and services, regional and local authorities, civil society organisations and the Ukrainian Parliamentary Commissioner for Human Rights, aimed at proactively identifying and supporting Roma in need of proper identification documents, including by further simplifying administrative procedures and by ensuring targeted support to overcome administrative barriers, where necessary.

A process of interim follow-up for these two recommendations will be conducted by ECRI no later than two years following the publication of this report.

LIST OF RECOMMENDATIONS

The position of the recommendations in the text of the report is shown in parentheses.

1. (§ 4) ECRI recommends that the authorities ensure that the UPCHR receives adequate human and financial resources, which should be commensurate to its increased workload and range of competencies, allowing it to carry out the full breadth of its mandate effectively, in line with ECRI's revised General Policy Recommendation (GPR) No. 2 on equality bodies to combat racism and intolerance at national level.
2. (§ 9) ECRI recommends that the authorities ensure, in consultation with relevant civil society organisations and representatives of groups of concern to ECRI, that human rights education comprises mandatory topics related to human rights, equality and diversity to be covered by all schools in practice.
3. (§ 16) ECRI recommends that the authorities implement measures aimed at promoting understanding of and respect for LGBTI pupils in schools and at preventing LGBTI-phobic bullying, such as developing guidelines for school staff, adopting a zero-tolerance policy towards such acts in schools, and developing tailored training for educators.
4. (§ 25) ECRI recommends that the authorities strongly support the adoption of legislative amendments to explicitly include the grounds of sexual orientation and gender identity in the Law on the Principles of Preventing and Combating Discrimination and other relevant legislation with anti-discrimination provisions. If necessary, Council of Europe support should be sought.
5. (§ 30) ECRI recommends that the authorities strengthen their efforts to improve access to healthcare for LGBTI persons, including by (i) ensuring, as far as possible, that transgender people have safe, affordable, and timely access to necessary gender-affirming treatments; (ii) providing training to healthcare professionals aimed at enhancing awareness, sensitivity, and understanding of the needs of LGBTI persons in this field, if necessary by engaging with universities and medical associations; (iii) working alongside LGBTI communities and relevant civil society actors to improve access of LGBTI persons to information about available healthcare and their rights in this field.
6. (§ 33) ECRI recommends that the authorities move forward with the revision of the relevant legislation and healthcare protocols in order to guarantee a quick, transparent, and accessible process by which transgender people can obtain legal gender recognition, which should not be contingent on abusive requirements, such as medical procedures and/or mental health diagnoses, in line with ECRI's General Policy Recommendation No. 17 on preventing and combating intolerance and discrimination against LGBTI persons and other relevant Council of Europe standards. If necessary, Council of Europe support should be sought.
7. (§ 39) ECRI recommends that the authorities establish an inter-institutional working group tasked with monitoring hate speech, with a particular emphasis placed on racist and LGBTI-phobic forms of hate speech, as well as making proposals for action, having due regard to ECRI's General Policy Recommendation No. 15 on combating hate speech and the Recommendation CM/Rec(2022)16 of the Committee of Ministers of the Council of Europe on combating hate speech. Such working group should include representatives of the relevant authorities, civil society organisations and groups of concern to ECRI, and the Ukrainian Parliament Commissioner for Human Rights, while respecting the institution's independence.
8. (§ 46) ECRI recommends, as a matter of priority, that the Ukrainian authorities conduct awareness-raising campaigns across the country with a view to preventing hate speech, including online hate speech, against groups of concern to ECRI, in

particular LGBTI persons and Roma, by stressing the importance of diversity and tolerance in society, in cooperation with relevant civil society actors.

9. (§ 54) ECRI recommends that the Ukrainian authorities pursue their efforts, in consultation with civil society actors, to propose or support legislative amendments to the criminal and other relevant legislation to ensure that such amendments (i) explicitly include sexual orientation, gender identity, sex characteristics, ethnic origin, and colour in the list of protected grounds, and (ii) permit the ex officio prosecution of hate crimes. In doing so, due regard should be paid to the Recommendation CM/Rec(2024)4 of the Committee of Ministers of the Council of Europe on combating hate crime. If necessary, Council of Europe support should be sought.
10. (§ 58) ECRI recommends that the Ukrainian authorities take further steps to ensure that hate crimes are adequately registered, investigated and prosecuted, including by (i) adopting clear operational guidelines or protocols on identifying and recording hate elements of crimes; (ii) providing tailored and practical training on this issue to police and other criminal justice actors, making it a compulsory part of their initial and continuous training; (iii) ensuring that operational guidelines or protocols are integrated into everyday case management, with a clear obligation for police officers and prosecutors to consider hate elements in each case and to record the victim's perception of any hate element. In this context, due account should be taken of the Recommendation CM/Rec(2024)4 of the Committee of Ministers of the Council of Europe on combating hate crime. If necessary, further Council of Europe support should be sought.
11. (§ 61) ECRI recommends that the Ukrainian authorities further strengthen their efforts to detect, investigate and prosecute organised extremist activity, including by ensuring that police and other law enforcement agencies explore links between hate incidents and extremist organisations. If necessary, dissuasive and deterrence measures should be further introduced to counter violent extremism and hate groups.
12. (§ 65) ECRI recommends that the authorities develop and implement a dedicated policy framework for the integration and inclusion of migrants in Ukraine, encompassing all areas of social life. This should include concrete and measurable goals, with an accompanying timeline for their implementation and evaluation, as well as dedicated budget. In developing such a document, the authorities should draw inspiration from the Council of Europe's Model Framework for an Intercultural Integration Strategy at the National Level and organise meaningful consultations with relevant civil society actors and international organisations. If necessary, Council of Europe support should be sought.
13. (§ 77) ECRI recommends, as a matter of priority, that the Ukrainian authorities create a task force involving representatives of relevant ministries and services, regional and local authorities, civil society organisations and the Ukrainian Parliamentary Commissioner for Human Rights, aimed at proactively identifying and supporting Roma in need of proper identification documents, including by further simplifying administrative procedures and by ensuring targeted support to overcome administrative barriers, where necessary.
14. (§ 83) ECRI recommends that the Ukrainian authorities take action to ensure access to quality education for Roma children with a view to increasing school enrolment and combating drop-out, in particular by (i) implementing measures to support their access to online learning and mobile education facilities, (ii) financing and implementing specific educational programmes for Roma women and girls, and (iii) creating outreach initiatives to encourage school attendance to Roma children living in compact settlements, in close coordination with Roma mediators and the families concerned. If necessary, Council of Europe support should be sought.

15. (§ 96) ECRI recommends that the authorities send a firm, regular message of zero tolerance for racism, religious intolerance, and LGBTI-phobia within the National Police, State Border Guard Service, and Armed Forces, including through suitable training and, where necessary, relevant instructions. In this connection, the authorities should make, where appropriate, public statements condemning racist and LGBTI-phobic incidents and make sure that any indications of such conduct by law enforcement officials or service personnel are effectively investigated.

BIBLIOGRAPHY

This bibliography lists the main published sources used during the examination of the situation in Ukraine. It should not be considered as an exhaustive list of all sources of information available to ECRI during the preparation of the report.

European Commission against Racism and Intolerance (ECRI)

1. ECRI (2020), [Conclusions on the implementation of the recommendations in respect of Ukraine subject to interim follow-up](#), CRI(2020)28.
2. ECRI (2017), [Fifth report on Ukraine](#), CRI(2017)38.
3. ECRI (2015), [Conclusions on the implementation of the recommendations in respect of Ukraine subject to interim follow-up](#), CRI(2015)25.
4. ECRI (2012), [Fourth report on Ukraine](#), CRI(2012)6.
5. ECRI (2008), [Third report on Ukraine](#), CRI(2008)4.
6. ECRI (2002), [Second report on Ukraine](#), CRI(2002)23.
7. ECRI (1999), [First report on Ukraine](#), CRI(99)10.
8. ECRI (1996), [General Policy Recommendation No. 1: Combating racism, xenophobia, antisemitism and intolerance](#), CRI(96)43.
9. ECRI (2018b), [General Policy Recommendation No. 2 \(revised\): Equality bodies to combat racism and intolerance at national level](#), CRI(2018)06.
10. ECRI (1998a), [General Policy Recommendation No. 3: Combating racism and intolerance against Roma/Gypsies](#), CRI(98)29.
11. ECRI (1998b), [General Policy Recommendation No. 4: National surveys on the experience and perception of discrimination and racism from the point of view of potential victims](#), CRI(98)30.
12. ECRI (2022a), [General Policy Recommendation No. 5 \(revised\): Preventing and combating anti-Muslim racism and discrimination](#), CRI(2022)6.
13. ECRI (2001), [General Policy Recommendation No. 6: Combating the dissemination of racist, xenophobic and antisemitic material via the Internet](#), CRI(2001)1.
14. ECRI (2003b), [General Policy Recommendation No. 7: National legislation to combat racism and racial discrimination](#), CRI(2003)8rev, as amended in 2017.
15. ECRI (2004), [General Policy Recommendation No. 8: Combating racism while fighting terrorism](#), CRI(2004)26.
16. ECRI (2021b), [General Policy Recommendation No. 9 \(revised\): Preventing and Combating Antisemitism](#), CRI(2021)28.
17. ECRI (2007a), [General Policy Recommendation No. 10: Combating racism and racial discrimination in and through school education](#), CRI(2007)6.
18. ECRI (2007b), [General Policy Recommendation No. 11: Combating racism and racial discrimination in policing](#), CRI(2007)39.
19. ECRI (2009), [General Policy Recommendation No. 12: Combating racism and racial discrimination in the field of sport](#), CRI(2009)5.
20. ECRI (2011), [General Policy Recommendation No. 13: Combating antigypsyism and discrimination against Roma](#), CRI(2011)37rev, as amended in 2020.
21. ECRI (2012), [General Policy Recommendation No. 14: Combating racism and racial discrimination in employment](#), 2012, CRI(2012)48.
22. ECRI (2016a), [General Policy Recommendation No. 15: Combating Hate Speech](#), CRI(2016)15.
23. ECRI (2016b), [General Policy Recommendation No. 16: Safeguarding irregularly present migrants from discrimination](#), CRI(2016)16.
24. ECRI (2023a), [General Policy Recommendation No. 17: Combating intolerance and discrimination against LGBTI persons](#), CRI(2023)30.
25. ECRI (2023b), [ECRI Glossary](#).
26. ECRI (2022b), [Statement of the European Commission against Racism and Intolerance \(ECRI\) on the consequences of the aggression of the Russian Federation against Ukraine](#), adopted at its 88th plenary meeting, 29 March-1 April 2022.

Other sources (listed in alphabetical order)

27. Al Jazeera (2022, 2 March), [More African students decry racism at Ukrainian borders](#).
28. Amnesty International (2019), [Ukraine: Human rights under pressure, their advocates under attack](#).
29. ARCA et al (2025), [Information Note on Progress Achieved in Ukraine Implementing the Rights of the Roma Minority of Ukraine](#), in the context of the 115th Session of the UN Committee on the Elimination of Racial Discrimination.
30. ARCA (2024), [Recovery of Ukraine and the perspective of Ukrainian Roma civil society: position paper of Ukrainian Roma civil society organisations](#).
31. BBC (2024, 25 June), [LGBT troops on Ukraine's front line fight homophobia at home](#).
32. Chiricli Roma Women Fund and ERGO Network (2025), Shadow report on the situation of Roma rights in Ukraine.
33. CNN (2022, 4 March), [Foreign students fleeing Ukraine say they face segregation, racism at border](#).
34. The Conversation (2025, 21 May), [Russia's invasion united different parts of Ukraine against a common enemy – 3 years on, that unanimity still holds](#).
35. Coalition of CSOs: Agency for Legislative Initiatives, Tomorrow's Lawyer, Ukrainian Bar Association, Transparency International Ukraine, ZMINA Human Rights Centre (2024), [Shadow report on Chapter 23 "Justice and Fundamental Rights" of the European Commission's report on Ukraine in 2023](#).
36. Council of Europe (2020), [Ukraine's hate crime, hate speech and discrimination data collection system: recommendations for improvement and for adoption a joint approach and national situational analysis](#).
37. Council of Europe (2022a), [Research on discrimination, hate speech and hate crimes in Ukraine](#).
38. Council of Europe (2022b), [Mapping national responses to hate speech in Ukraine: systemic research and policy proposals for combating hate speech in Ukraine](#).
39. Council of Europe, Advisory Committee on the Framework Convention for the Protection of National Minorities (AC FCNM), [Sixth report submitted by Ukraine](#), pursuant to Article 25 of the Framework Convention for the Protection of National Minorities, received on 10 January 2025.
40. Council of Europe Commissioner for Human Rights (2022), [LGBTI people affected by the war in Ukraine need protection](#).
41. Council of Europe Commissioner for Human Rights (2023), [Crimean Tatars' struggle for human rights](#).
42. Council of Europe, European Commission for Democracy through Law (Venice Commission) (2025), [Ukraine - Amicus curiae brief on alternative \(non-military\) service](#), adopted by the Venice Commission at its 142nd Plenary Session (Venice, 14-15 March 2025).
43. DW (2025, 7 April), [Ukraine: Discrimination and hope drive LGBTQ+ soldiers](#).
44. Eurasian Coalition for Health, Rights, Gender and Sexual Diversity (ECOM) (2024), [Regional report on violations of the human rights of LGBT people in the countries of Eastern Europe and Central Asia](#).
45. Eurasian Coalition for Health, Rights, Gender and Sexual Diversity (ECOM) (2023), [Assessment of the needs of trans people in accessing health and rights in Ukraine](#).
46. European Association of Jehovah's Witnesses (2025), Ukraine: assaults, prosecution and imprisonment of conscientious objectors (September 2025 update).
47. European Commission (2024), Ukraine 2024 Report: Commission staff working document accompanying the 2024 Communication on EU enlargement policy, [SWD\(2024\) 699 final](#).
48. European Council on Refugees and Exiles (ECRE) (2025), [Asylum Information Database: Ukraine](#).
49. European Roma Rights Centre (2018), [Anti-Roma pogroms in Ukraine: on C14 and tolerating terror](#).
50. European Roma Rights Centre (2021), [Far-right groups target Romani community near Kiev after fight between two Romani teenagers and a soldier](#).
51. European Roma Rights Centre (2023), [Challenging digital antigypsyism](#).
52. European Roma Rights Centre (2022), [Ukrainian court rules for Romani family against school segregation](#).
53. France 24 (2023, 9 March), ['Brothers in arms': war brings Ukrainians and Roma closer, for now](#).
54. France 24 (2022, 1 March), [Foreign students stuck at Ukraine border complain of racism](#).
55. Freedom House (2023), [Annual Report on Hate Crimes in Ukraine 2022](#).
56. Gender Stream et al (2025), Declaration on criminalising hate crimes based on sexual orientation and gender identity in Ukraine.

57. Gender Stream (2024), [Queering displacement: the state of the Ukrainian LGBTQ+ community during the Russian full-scale invasion](#).
58. Global Alliance of National Human Rights Institutions (GANHRI) (2019), [Sub-Committee on Accreditation: 35th Session Report and Recommendations](#).
59. Global Public Policy Institute (2024), [Queering displacement the state of the Ukrainian LGBTQ+ community during the Russian full-scale invasion](#).
60. The Guardian (2024, 29 April), [‘My example can change minds’: Roma fighting for place in postwar Ukraine](#).
61. The Guardian (2018, 27 August), [‘They wanted to kill us’: masked neo-fascists strike fear into Ukraine’s Roma](#).
62. HIAS and Right to Protection (2023), [Asylum seekers and refugees in Ukraine: addressing protection risks during wartime](#).
63. Human Rights in Ukraine (2020, 23 April), [Criminal investigation initiated after Mayor of Ivano-Frankivsk orders forced eviction of Roma](#).
64. Human Rights Watch (2024), [Ukraine: New Law Raises Religious Freedom Concerns](#).
65. Human Rights Watch (2021), [Radicals Target Roma People in Ukraine - End Impunity for Hate Crimes](#).
66. ILGA Europe (2025), [Annual review of the human rights situation of LGBTI people: Ukraine](#).
67. ILGA Europe et al (2022), [Briefing Note: Securing access to border crossings for vulnerable LGBTI people in the context of the war in Ukraine](#).
68. The Independent (2022, 1 March), [UN admits refugees have faced racism at Ukraine borders](#).
69. International Organisation for Migration (IOM) (2021), [Irregular Migrants in Ukraine](#).
70. International Intersex Human Rights NGO (2020), [Intersex genital mutilations - human rights violations of children with variations of reproductive anatomy](#), NGO Report (for LOI) to the 5th to 6th Report of Ukraine on the Convention on the Rights of the Child (CRC).
71. Insight (2024), [LGBT+ people of Ukraine during the full-scale war: the general situation and dynamics of changes](#).
72. Insight (2022), [Analytical note: the situation of LGBT+ people in Ukraine during the war](#).
73. Institute of Mass Information (IMI) (2021, 10 March), [39 cases of hate speech targeted Roma in mass media, since last three months](#).
74. International Renaissance Foundation (IRF) (2023), [Education of Roma children in Ukraine during the war](#).
75. Jehovah’s Witnesses (2025), [Imprisoned for their faith – Ukraine](#).
76. Kyiv International Institute of Sociology (KIIS) (2025), [Attitudes towards refugees, internally displaced persons, Russian-speaking citizens and some other categories of the population of Ukraine](#).
77. KIIS (2024), [Perception of LGBT people and their rights in Ukraine: results of a telephone survey conducted on May 26 – June 1, 2024](#).
78. KIIS (2023), [Inter-ethnic prejudices in Ukraine](#).
79. LGBTI Consortium (2024), [IRI Research: Support for LGBTIQ+ Among Ukrainian Youth on the Rise](#).
80. Minority Rights Group and Roma Women Fund Chiricli, [Monitoring discrimination against Roma with disabilities during the conflict in Ukraine](#).
81. National Democratic Institute (NDI) (2024), [Summary of NDI public opinion research on key topics \(2016-2024\)](#).
82. Nash Svit Center (2025), [Struggle for the future: LGBTQ situation in Ukraine in 2024](#).
83. Nash Svit Center (2024), [LGBTQ situation in Ukraine in January – June 2024](#).
84. Nash Svit Center (2022), [LGBTQ and war: a report on the specific problems of the Ukrainian LGBTQ community since the beginning of the Russian invasion’s new phase](#).
85. New York Times (2018, 21 July), [Attacks on Roma Force Ukraine to Confront an Old Ethnic Enmity](#).
86. Open Democracy (2023, 8 February), [Trans people are caught in the war in Ukraine](#).
87. OSCE (2021), [Current State and Prospects of Teaching Human Rights in Ukraine’s Schools](#).
88. OSCE/ODIHR (2024a), [Hate Crime Report 2023: Ukraine](#).
89. OSCE/ODIHR (2024b), [Report on the human rights situation of internally displaced Roma people in Ukraine](#).
90. OSCE/ODIHR (2024c), [Mapping the challenges faced by Ukrainian Roma in a war time and overcoming the obstacles through policy, advocacy and empowerment](#).
91. OSCE/ODIHR (2019a), [Categorizing and Investigating Hate Crimes in Ukraine: A Practical Guide](#).
92. OSCE/ODIHR (2019b), [Using Bias Indicators: A Practical Tool for Police](#).

93. OSCE/ODIHR (2018), [Access to personal documents for Roma in Ukraine: more efforts needed](#).
94. Right to Protection (2025), [Alternative report to the Committee on the Elimination of Racial Discrimination \(CERD\) in relation to the review of the periodic report of Ukraine](#).
95. Right to Protection (2023a), [The Study: Community organisations: resources for protecting refugees and asylum seekers in Ukraine](#).
96. Right to Protection (2023b), [The migration policy of Ukraine concerning foreigners in the context of post-war reconstruction](#).
97. Right to Protection (2025), [Alternative report to UN Committee on the Elimination of Racial Discrimination \(CERD\)](#).
98. Roma Foundation for Europe (2024), [Fighting for a fairer future: The impact of the war in Ukraine on Roma and lessons for post-war reconstruction efforts](#).
99. Shevtsova (2021), [School as a Battlefield: The Debate on Sexuality Education in Ukraine](#), published on the webpage of the Heinrich Böll Stiftung.
100. The Telegraph (2022, 28 February), [‘One cop pulled a gun out’: Ukraine’s black refugees recall ‘racist’ hostility as they tried to flee](#).
101. TERGO (2021), [Survey on the national school environment in Ukraine](#).
102. TGEU (Trans Europe and Central Asia), Insight (Ukraine), National Trans Coalition (Armenia), and Association Spectra (Montenegro) (2024), [Trans rights in Eastern Europe and the Caucasus: Armenia, Montenegro, Ukraine](#).
103. Time (2022, 1 March), [They Called Ukraine Home. But They Faced Violence and Racism When They Tried to Flee](#).
104. United Nations (2025, 1 October), [Ukraine: UN experts warn of persecution against Ukrainian Orthodox Church](#).
105. United Nations (2022, 3 March), [Ukraine: UN experts concerned by reports of discrimination against people of African descent at border](#).
106. United Nations Committee on the Elimination of Racial Discrimination (UN CERD) (2025), [Concluding observations on the combined twenty-fourth to twenty-sixth periodic reports of Ukraine](#).
107. United Nations Office of the High Commissioner for Human Rights (OHCHR) (2024), [Situation of human rights in Ukraine: 1 September to 30 November 2024](#).
108. Ukrainian News (2025, 20 January), [Police close case against Ivano-Frankivsk mayor who wanted to forcibly deport Roma to Zakarpattia](#).
109. Ukrainian Parliamentary Commissioner for Human Rights (UPCHR), European Network of National Human Rights Institutions (ENNHRI), United Nations Development Programme (UNDP) and Office of the United Nations High Commissioner for Human Rights (OHCHR) (2023), [Report of the Capacity Assessment](#).
110. UPCHR (2025a), [Annual report on the state of observance and protection of human and civil rights and freedoms in Ukraine in 2024](#) (in Ukrainian).
111. UPCHR (2025b), [Information from the Ukrainian Parliament Commissioner for Human Rights on the situation with the implementation of the provisions of the International Convention on the Elimination of All Forms of Racial Discrimination in Ukraine](#).
112. UPCHR (2024a), [Report on the observance and protection of human and civil rights and freedoms in Ukraine in 2023](#).
113. UPCHR (2024b), [Special report on the observance of the rights of national minorities \(communities\) and indigenous peoples in the conditions of the armed aggression of the Russian Federation against Ukraine for the period from 24 February 2022 to 31 December 2023](#).
114. UPCHR (2023), [Report on the observance and protection of human and civil rights and freedoms in Ukraine in 2022](#).
115. UPCHR (2020), [Special Report on the impact of the COVID-19 pandemic on the Roma community in Ukraine](#).
116. Voice of Romni (2024a), [The state of Roma communities during the war in Ukraine](#).
117. Voice of Romni (2024b), [Identity, gender aspects, and traditions](#).
118. Winds of Change (2024), [Empowering women’s voices in communities – gender analysis](#).
119. ZMINA (2025), [Analysis of the Draft Law “On the Commissioner of the Verkhovna Rada of Ukraine for Human Rights” \(reg. No. 13181 of 17.04.2025\)](#).
120. ZMINA (2022), [The Migration Service should allow Belarusian citizens, including volunteers of the Armed Forces of Ukraine, to legalize themselves in Ukraine](#) (in Ukrainian).
121. ZMINA (2022, 3 March), [Evacuation of foreigners from Ukraine: is there really racial discrimination?](#).

APPENDIX: GOVERNMENT'S VIEWPOINT

The following appendix does not form part of ECRI's analysis and proposals concerning the situation in Ukraine.

ECRI, in accordance with its country-by-country procedure, engaged into confidential dialogue with the authorities of Ukraine on a first draft of the report. A number of the authorities' comments were taken on board and integrated into the report's final version (which, in line with ECRI's standard practice and unless otherwise indicated, could only take into account developments up until 19 March 2026, date of the examination of the first draft).

The authorities also requested that the following viewpoint be reproduced as an appendix to the report.

Introductory observations

The Government of Ukraine expresses its sincere appreciation to the European Commission against Racism and Intolerance (ECRI) for its sixth-cycle monitoring work concerning Ukraine and, in particular, for the working visit of the ECRI delegation to Ukraine from 15 to 19 September 2025. Ukraine is grateful that, in the exceptional security circumstances created by the ongoing war of aggression of the Russian Federation against Ukraine, the delegation travelled to Ukraine and held meetings not only in Zakarpattia Oblast but also in Kyiv. The Ukrainian side highly values the professional commitment and personal resolve demonstrated by the members of the delegation in carrying out the visit in a country at war.

Despite the ongoing war of aggression of the Russian Federation against Ukraine and the extraordinary pressures that it places on State institutions and society, Ukraine continues to fulfil its international obligations, safeguard human rights and fundamental freedoms, maintain functioning public institutions and pursue reforms based on equality, non-discrimination, human dignity, the rule of law and high European standards. The Government considers this continued work under wartime conditions an important context in which the findings of the report and the information set out below should be read. Ukraine's cooperation with ECRI forms part of this broader commitment, including in the context of Ukraine's European integration process.

The Government of Ukraine thanks ECRI and its Secretariat for the constructive dialogue and cooperation throughout the monitoring process. The State Service of Ukraine for Ethnic Affairs and Freedom of Conscience (DESS) acts as the national liaison institution for cooperation with ECRI, while Mr Ihor Lossovskyi, the Deputy Head of DESS, serves as the National Liaison Officer. In this capacity, the Ukrainian side remains open to continuous professional dialogue, timely exchange of information and practical cooperation with ECRI and the Council of Europe.

The Ukrainian authorities participated actively and in good faith in the confidential dialogue provided for under ECRI's country-monitoring procedure and supplied factual clarifications, legal information and updates from the competent authorities. Ukraine appreciates ECRI's openness to dialogue and its readiness to consider information transmitted by the Ukrainian side. The observations below are intended to complement the report with consolidated and updated information, to clarify certain factual or terminological points, and to set out the Government's position on selected findings and recommendations.

Factual clarification concerning the Summary of the Report

The Ukrainian side considers it important to clarify the reference in the Summary of the Report concerning the impact of military service obligations on certain religious minorities. The concerns referred to in this context relate specifically to military service obligations *during mobilisation*. Accordingly, this qualification should be reflected in the relevant wording of the Report.

I. Effective equality and access to rights

The Government of Ukraine welcomes ECRI's attention to inclusive education and shares the objective of ensuring a safe, inclusive and non-discriminatory educational environment for every child. At the same time, the Government considers it important that the assessment of the Ukrainian education system fully reflect the legal, policy and practical measures already in place and being implemented, including under the exceptionally difficult conditions caused by the ongoing war of aggression of the Russian Federation against Ukraine. The Ukrainian education system is based on the principles of respect for human rights, cultural diversity, non-discrimination and the development of civic identity. Ukrainian legislation guarantees equal access to quality education for all learners regardless of their origin, status or ethnicity, including migrant children, internally displaced children and children belonging to the Roma national minority. In the conditions of the full-scale war, particular attention is given to vulnerable categories of children, including internally displaced Roma, through measures aimed at ensuring access to the educational process, developing methodological guidance and preventing discrimination.

The Government does not agree with the statement that the Ukrainian education system lacks content aimed at developing competences in the fields of human rights, equality, diversity and non-discrimination. Relevant issues are already integrated into the content of education at different levels, including through the subjects "I Explore the World", "Civic Education", "History", "Health and Safety" and "Law". ECRI itself acknowledges the presence of such components in the Ukrainian education system. At the same time, the Ukrainian side takes into account observations concerning possible differences in the practical implementation of the relevant content in educational institutions. Further work should therefore be aimed at ensuring the proper implementation of the approaches to human rights, equality, diversity and non-discrimination already defined by State standards and educational programmes.

The Government also considers that the assertion concerning the inadequate representation of Roma history and culture requires clarification. The history and culture of different ethnic and religious communities, including Roma, are already reflected in the curricula of Ukrainian history, world history and civic education. The Ukrainian education system is based on the principles of respect for cultural diversity, human rights, non-discrimination and the development of civic identity. The culture and history of national minorities, including the Roma community, can and should be presented as part of the multicultural history of Ukraine. At the same time, Ukraine takes into account ECRI's recommendation to strengthen attention to Roma history and culture, in particular the history of the Roma Holocaust and the cultural contribution of the Roma community to the history of Ukraine. Further improvement of relevant teaching materials and methodological recommendations for educators taking this subject matter into account is considered appropriate, and work on strengthening the relevant content of educational programmes and teaching materials will continue.

Relevant elements concerning equality, non-discrimination and the rights of different groups are already present in Ukrainian education. In particular, the model curriculum for

the elective Grade 10 course “Culture of Equality and Mutual Respect in Modern Society” is aimed at developing tolerance, studying the principles of non-discrimination, combating stereotypes and protecting the rights of different groups, including LGBT persons.

Ukraine has mechanisms for developing educators’ competences in the relevant areas. Programmes at pedagogical universities include courses related to inclusion and civic education, while institutions of postgraduate pedagogical education offer advanced training on such subjects as “Prevention of Discrimination”, “Pedagogy of Tolerance” and “Working with Children with War or Migration Experiences”. Training activities on human rights and inclusive education have also been supported, including in cooperation with civil society and international organisations, and educators have access, on a voluntary basis, to free e-learning courses related to working in a multicultural environment.

Ukraine also continues to develop human rights education through youth work and non-formal education. Particular attention is given to strengthening the competences of youth workers in applying approaches based on human rights, equality, respect for diversity and inclusion. One practical example is the training on the application of the Council of Europe’s Compass: Manual for Human Rights Education with Young People, held in July 2025 in partnership with the Ministry of Youth and Sports of Ukraine and the Ministry of Education and Science of Ukraine for 24 youth workers, teachers and educators. Ukraine will continue to develop the potential of youth work and non-formal education to foster among young people a culture of respect for human rights, human dignity, equality, diversity and inclusion.

The applicable legislation of Ukraine, including the Laws of Ukraine “On Education” and “On the Protection of Childhood”, establishes equal access to education, non-discrimination and respect for the dignity of every learner as principles of State policy. Ukraine consistently implements a policy of zero tolerance towards any form of bullying and discrimination in educational institutions, including on the grounds of sexual orientation and gender identity. To enhance the professional skills of teachers and school psychologists, specialised training is provided, and educational and methodological materials aimed at preventing violence and creating a safe educational environment have been developed. These include, in particular, the educational series “School without Bullying”, the educational and methodological manual “Creating a Safe School Environment and Specific Features of Working with LGBT Adolescents”, as well as a manual on the use of animated videos for educational activities.

Article 3 of the Law of Ukraine “On Emergency Medical Care” guarantees every person in the territory of Ukraine the right to accessible, timely and quality emergency medical care. An emergency call may not be refused, and the provision of such care may not be delayed, on grounds of citizenship, legal status or absence of documents. Any question of payment or reimbursement of the cost of medical services by particular categories of foreigners is addressed after emergency medical care has been provided, in accordance with the Law of Ukraine “On State Financial Guarantees of Medical Care for the Population” and Resolution of the Cabinet of Ministers of Ukraine No. 121 of 19 March 2014, and cannot constitute a precondition for accepting an emergency call, hospitalisation or urgent treatment. The Ukrainian side therefore suggests using the legally defined term “emergency medical care” in paragraphs 19, 20 and 70 where the report refers to care provided by the emergency medical care system.

Ukrainian legislation guarantees equal access to quality education for all learners regardless of their origin, status or ethnicity, including migrant children, internally displaced persons and persons belonging to the Roma national minority. The Ministry of

Education and Science consistently implements measures to support the study of the State language, ensure intercultural dialogue and psychosocial support in educational institutions. In the context of the full-scale war of aggression, special attention is paid to supporting vulnerable categories of children, in particular internally displaced Roma, by ensuring access to the educational process, developing methodological recommendations and preventing discrimination. The Ukrainian side is ready to continue to improve the regulatory framework and practical tools for the systemic integration of all participants in the educational process.

Within the “3.1 Human Rights Framework” area of Section III “Fundamental Rights” of the Rule of Law Roadmap, the Ministry of Justice, with the participation of state authorities, civil society and international partners, prepared the draft National Human Rights Strategy until 2035 (the draft Strategy). The draft Strategy is envisaged as a framework policy document in the field of human rights, comprising three strategic objectives and 25 operational objectives, as well as principles for ensuring and protecting human rights and freedoms in Ukraine, taking into account the conditions of martial law, the consequences of the armed aggression of the Russian Federation against Ukraine, and the needs of post-war recovery. A separate operational objective addresses prevention and combating of discrimination, hate speech and hate crimes and respect for the rights of LGBTIQ+ persons. The tasks under this operational objective are aimed at bringing Ukrainian legislation into line with international standards, improving the system for recording criminal offences and institutional capacity to ensure an appropriate response to such criminal offences, as well as strengthening the protection of the rights of LGBTIQ+ persons, in particular through the establishment of a legal framework for registered partnerships. As of 17 August 2026, the draft Strategy had been agreed with the relevant government authorities and submitted to the European Commission for analysis and assessment of compliance with Ukraine’s European-integration commitments.

Comments and proposals concerning the operational objective on preventing and combating discrimination, hate speech and hate crimes and ensuring respect for the rights of LGBTIQ+ persons were also received in the framework of cooperation with the EU and Council of Europe project “Support for implementing European standards relating to anti-discrimination and the rights of national minorities in Ukraine”. Following the adoption of the Strategy and through the inclusive engagement of stakeholders, an Operational Plan for the next three years will be developed that will include a list of specific measures and mechanisms necessary for its implementation. This Operational Plan will contain clearly defined steps for implementing the Strategy and ensure a continued systematic approach to advancing human rights, particularly under the legal framework of martial law and during Ukraine’s post-war recovery.

As regards the legislative framework for preventing and combating discrimination, the Ukrainian side draws attention to Draft Law No. 13597, registered in the Verkhovna Rada of Ukraine on 4 August 2025. Draft Law No. 13597 introduces amendments to the Law of Ukraine “On the Principles of Preventing and Combating Discrimination in Ukraine” and provides for the following definition of “intolerance”: an open, prejudiced and negative attitude towards a person and/or a group of persons who differ on such grounds as race, colour, political, religious and other beliefs, sex, age, disability, health status, ethnic, national and social origin, citizenship, family and property status, sexual orientation, gender identity, place of residence, language, or other characteristics.

Draft Law No. 13597 also proposes the following definition of “discrimination”: a situation in which a person and/or a group of persons, on the grounds of race, colour, political, religious and other beliefs, sex, sexual orientation, gender identity, age, disability, health status, ethnic, national and social origin, citizenship, family and property

status, place of residence, language or other characteristics which were, are or may be actual or presumed (hereinafter referred to as “certain characteristics”), are subject to restrictions on the recognition, exercise or enjoyment of rights and freedoms in any form established by this Law, as compared with other persons and/or groups of persons, except where such restriction pursues a legitimate and objectively justified aim and the means of achieving that aim are appropriate and necessary.

The amendments proposed by Draft Law No. 13597 to the Criminal Code of Ukraine and the Code of Ukraine on Administrative Offences contain blanket references to the above-mentioned definitions to be introduced into the Law of Ukraine “On the Principles of Preventing and Combating Discrimination in Ukraine”.

Ukrainian legislation and the conditions of the Programme of Medical Guarantees do not establish restrictions on access to medical services on grounds of sexual orientation or gender identity. Medical care is provided according to medical indications, sectoral standards, patients’ rights and the terms of agreements on medical care for the population. Clinical care for persons with gender dysphoria is regulated by the Unified Clinical Protocol of Primary, Secondary (Specialised) and Tertiary (Highly Specialised) Medical Care “Gender Dysphoria”, approved by Order of the Ministry of Health of Ukraine No. 972 of 15 September 2016.

With regard to antiretroviral medicines, the State guarantees, free of charge, antiretroviral medicines for HIV treatment, pre-exposure and post-exposure prophylaxis, medicines for prevention and treatment of opportunistic infections, and medical devices for monitoring treatment effectiveness, pursuant to paragraph 20 of part one of Article 4 of the Law of Ukraine “On Counteracting the Spread of Diseases Caused by the Human Immunodeficiency Virus (HIV) and on the Legal and Social Protection of People Living with HIV”. At present, continuity of antiretroviral therapy is maintained with substantial financial and technical support from international partners.

Each international partner makes a significant contribution to the stable functioning of HIV services in Ukraine, which is critically important under martial law and amid growing healthcare needs. Cooperation with international partners is essential to preserving the achievements of the national response to the HIV epidemic. Coordinated work between the Ministry of Health of Ukraine and international partners, effective planning, stable logistics and consistent partner support have ensured continuity of treatment for people living with HIV irrespective of sexual orientation or gender identity.

The report’s description of the implementation of ICD-11 should be updated. Order of the Ministry of Health of Ukraine No. 703 of 23 April 2025 approved the Operational Action Plan for the implementation of ICD-11 in Ukraine for 2025-2026, and Order No. 768 of 2 May 2025 established the relevant working group. Ukraine is therefore implementing an approved plan covering regulatory, organisational and technical preparations, including necessary changes to the electronic healthcare system.

The current mechanism for changing information concerning a person’s sex is based, inter alia, on Article 51 of the Fundamentals of the Legislation of Ukraine on Health Care, Order of the Ministry of Health of Ukraine No. 1041 of 5 October 2016, and the rules governing the state registration of civil-status acts. It comprises both medical and civil-registration components.

Ukrainian healthcare legislation provides for general safeguards concerning the justification and safety of medical interventions, as well as the obtaining of informed consent in the cases and in accordance with the procedure established by law. Medical intervention must be carried out where medically indicated and provided that the expected benefit outweighs the potential risk to health. The Programme of Medical Guarantees

does not provide for a separate package or tariff entitled “sex-normalisation surgery”. Therefore, the assertion that medically unjustified interventions are financed by the State cannot be considered substantiated solely on the basis of the terms of the Programme of Medical Guarantees. The Ukrainian side proposes either to substantiate the relevant assertion by reference to official statistical or administrative data, or to state clearly that it reflects information reported by representatives of civil society.

The question of introducing a specific legislative prohibition on irreversible interventions without an urgent medical need before a child reaches an age at which they are able to provide informed consent requires comprehensive clinical, bioethical and legal consideration, with the involvement of relevant specialists and representatives of patient communities, as well as the establishment of exceptions for urgent medical indications.

II. Hate speech and hate-motivated violence

The Verkhovna Rada of Ukraine is currently considering Draft Law No. 13597 of 4 August 2025 “On Amendments to the Code of Ukraine on Administrative Offences and the Criminal Code of Ukraine Concerning Combating Manifestations of Discrimination”. Draft Law No. 13597 is intended, inter alia, to establish liability for acts of discrimination and intolerance, which will ensure effective protection of human rights, increase the level of tolerance in society, and bring national legislation into line with international standards in the field of combating discrimination

The Verkhovna Rada is also considering the following alternative draft laws: Draft Law No. 13597-1 of 18 August 2025, “On Amendments to Article 161 of the Criminal Code of Ukraine regarding the Strengthening of Liability for Violations of Citizens’ Equal Rights Based on Their Racial, National or Regional Affiliation, Religious Beliefs, Disability and Other Characteristics”; and Draft Law No. 13597-2 of 20 August 2025, “On Amendments to the Code of Ukraine on Administrative Offences and Certain Other Laws of Ukraine regarding Combating Discrimination”.

The Government draws attention to an inter-institutional mechanism that is already in place. By Order No. H-114/12 of the State Service of Ukraine for Ethnic Affairs and Freedom of Conscience (DESS) of 30 October 2024, adopted pursuant to paragraphs six to eight of Article 22 of the Law of Ukraine “On Central Executive Authorities”, the third and fourth subparagraphs of paragraph 11 of the Regulation on the State Service of Ukraine for Ethnic Affairs and Freedom of Conscience, approved by Resolution No. 812 of the Cabinet of Ministers of Ukraine of 21 August 2019, and Section III of Annex 2 to the State Targeted National and Cultural Programme “Unity in Diversity” until 2034, approved by Order No. 850-p of the Cabinet of Ministers of Ukraine of 26 September 2023, a Working Group for Coordinating Interaction between State Authorities on Preventing and Combating Discrimination was established.

The Working Group includes representatives of DESS, the Ministry of Internal Affairs of Ukraine, the Secretariat of the Ukrainian Parliament Commissioner for Human Rights, the Ministry of Justice of Ukraine, and the National Council of Television and Radio Broadcasting of Ukraine.

During its meetings in 2025-2026, the Working Group considered, inter alia, the following draft laws: “On Amendments to Certain Legislative Acts of Ukraine concerning the Prevention and Combating of Hate Speech”; “On Amendments to the Law of Ukraine ‘On the Principles of Preventing and Combating Discrimination in Ukraine’ concerning protection against discrimination by Association, Multiple Discrimination and Hate Speech”; “On Amendments to the Code of Ukraine on Administrative Offences

concerning the Prevention and Combating of Hate Speech”; and “On Amendments to the Criminal Code of Ukraine concerning the Prevention and Combating of Hate Speech”.

Ukraine recognises the importance of systematic efforts to prevent and counter hate speech, including in the online environment, and to promote respect for human dignity, diversity and tolerance. Within the framework of the State youth policy, these approaches are implemented through youth work and non-formal education, including by strengthening the competences of youth workers and engaging with youth and civil society organisations. These instruments contribute to fostering among young people a culture of respect for human rights and diversity, developing critical thinking, non-discriminatory communication and responsible behaviour, including in the digital environment. Ukraine will continue to use the potential of youth work, non-formal education and partnerships with civil society organisations as part of comprehensive efforts to prevent hate speech, promote respect for diversity and tolerance, and foster an inclusive environment for young people.

The Rule of Law Roadmap, endorsed as part of the negotiation process for Ukraine’s accession to the European Union, identifies the Office of the Prosecutor General as a lead or co-responsible authority for measures aimed at improving legislation on equality, non-discrimination and combating hate speech, and at strengthening registration, recording and statistical collection mechanisms for relevant criminal offences. These measures are consistent with the ECRI recommendations in this regard.

The free legal aid system conducts ongoing legal-education activities aimed at raising the public’s legal awareness, preventing human-rights violations, ensuring equal access to justice, and providing information on legal remedies. In 2025, the FLA system conducted an information and legal-awareness campaign, as part of which 10 informational posts were prepared and shared on the system’s official social media pages regarding the availability of free legal aid for members of the Roma national minority, non-discrimination in access to legal aid, documentation, and other relevant legal issues. The total reach of these materials was 144 720 people. In 2026, the FLA system conducted an information and legal-awareness campaign, as part of which informational material regarding the availability of free legal aid for members of the Roma national minority was prepared and disseminated on the system’s official social media pages. The material was viewed more than 10 000 times. To improve access to legal information for members of national minorities (communities) and indigenous peoples, the Coordination Center for Legal Aid has developed a concept for the flagship project “Barrier-Free Access to Legal Information for National Minorities”. The project involves translating advice on the most pressing legal issues – posted on the “WikiLegalAid” legal advice and information platform – into the languages of national minorities, raising awareness of the right to free legal aid, and simplifying access to it. In cooperation with the joint project of the EU and the Council of Europe “Supporting the Implementation of European Standards on Combating Discrimination and the Rights of National Minorities in Ukraine,” a number of the most popular legal consultations have been translated into Hungarian, Armenian, and Romani.

The Verkhovna Rada is considering Draft Law No. 14409 of 29 January 2026 “On Amendments to the Law of Ukraine ‘On Free Legal Aid’ Regarding the Strengthening of Protection for Victims of Hate Crimes”, which proposes to expand the list of individuals eligible for free secondary legal aid to include those recognised as victims in criminal proceedings concerning hate crimes committed on the grounds of sexual orientation and/or gender identity.

The Prosecutor’s Training Center of Ukraine has launched the distance-learning course “Effective Investigation and Countering of Hate-Motivated Crimes”, developed jointly

with the NGO “Social Action Center” within the “Transformational Recovery for Human Security in Ukraine” project, funded by the Government of Japan and implemented by UNDP in Ukraine. As of the second quarter of 2026, 92 prosecutors had successfully completed the course and received certificates. On 16 April 2026, an in-person training session entitled “Principles of Accessibility, Inclusiveness, Gender Equality and Non-Discrimination. Ethics of Communication with Persons with Disabilities” was also held for prosecutors and other prosecution-service employees. The Training Center has conducted a training-needs assessment and is developing a practical guide on investigating criminal offences committed with “intolerance” as a motive.

The Office of the Prosecutor General also supplied updated statistical information on criminal offenses registered during 2022-2025 and January-June 2026 under Articles 122, 126, and 127 of the Criminal Code of Ukraine, committed on the grounds of racial, national, or religious intolerance, as well as under Articles 161 and 300 of the Criminal Code of Ukraine, and the results of their investigation. (According to statistical reporting data under Form No. 1 “Unified Report on Criminal Offenses”)

Period	Article of the Criminal Code of Ukraine		Criminal offenses registered during the reporting period	Criminal offenses in respect of which proceedings were closed	including	Criminal offenses recorded during the reporting period*	Criminal offenses in respect of which proceedings were referred to court (including proceedings from previous years)	including
					including under paragraphs 1, 2, 4-1, 6, and 9-1 of Part 1 of Article 284 of the Criminal Procedure Code of Ukraine			of the offenses recorded during the reporting period
January-December 2022	Based on racial, national or religious intolerance	Intended bodily injury of medium gravity, Article 122 of the Criminal Code of Ukraine	0	0	0	0	0	0
		Battery and torture, Article 126 of the Criminal Code of Ukraine	0	0	0	0	0	0
		Torture, Article 127 of the Criminal Code of Ukraine	0	0	0	0	0	0
	Violation of equality of citizens depending on their race, nationality, religious beliefs, disability and other grounds, Article 161 Criminal Code of Ukraine		160	58	58	102	34	29
	Importation, manufacture or distribution of works that promulgate violence and cruelty, racial, national or religious intolerance and discrimination, Article 300 Criminal Code of Ukraine		12	1	1	11	4	3
January-December 2023	Based on racial, national or religious intolerance	Intended bodily injury of medium gravity, Article 122 of the Criminal Code of Ukraine	0	0	0	0	0	0
		Battery and torture, Article 126 of the Criminal Code of Ukraine	0	0	0	0	0	0
		Torture, Article 127 of the Criminal Code of Ukraine	0	0	0	0	0	0
	Violation of equality of citizens depending on their race, nationality, religious beliefs, disability and other grounds, Article 161 Criminal Code of Ukraine		207	57	57	150	77	60
	Importation, manufacture or distribution of works that promulgate violence and cruelty, racial, national or religious intolerance and discrimination, Article 300 Criminal Code of Ukraine		11	1	1	10	7	3
January-December 2024	Based on racial, national or religious intolerance	Intended bodily injury of medium gravity, Article 122 of the Criminal Code of Ukraine	0	0	0	0	0	0
		Battery and torture, Article 126 of the Criminal Code of Ukraine	0	0	0	0	0	0
		Torture, Article 127 of the Criminal Code of Ukraine	0	0	0	0	0	0
	Violation of equality of citizens depending on their race, nationality, religious beliefs, disability and other grounds, Article 161 Criminal Code of Ukraine		177	21	21	156	118	98
	Importation, manufacture or distribution of works that promulgate violence and cruelty, racial, national or religious intolerance and discrimination, Article 300 Criminal Code of Ukraine		7	3	3	4	3	2
January-December 2025	Based on racial, national or	Intended bodily injury of medium gravity, Article 122 of the Criminal Code of Ukraine	0	0	0	0	0	0

Period	Article of the Criminal Code of Ukraine		Criminal offenses registered during the reporting period	Criminal offenses in respect of which proceedings were closed	including	Criminal offenses recorded during the reporting period*	Criminal offenses in respect of which proceedings were referred to court (including proceedings from previous years)	including
					including under paragraphs 1, 2, 4-1, 6, and 9-1 of Part 1 of Article 284 of the Criminal Procedure Code of Ukraine			of the offenses recorded during the reporting period
	religious intolerance	Battery and torture, Article 126 of the Criminal Code of Ukraine	0	0	0	0	0	0
		Torture, Article 127 of the Criminal Code of Ukraine	0	0	0	0	0	0
	Violation of equality of citizens depending on their race, nationality, religious beliefs, disability and other grounds, Article 161 Criminal Code of Ukraine		136	13	13	123	64	46
	Importation, manufacture or distribution of works that promulgate violence and cruelty, racial, national or religious intolerance and discrimination, Article 300 Criminal Code of Ukraine		15	7	7	8	4	4
January-June 2026	Based on racial, national or religious intolerance	Intended bodily injury of medium gravity, Article 122 of the Criminal Code of Ukraine	0	0	0	0	0	0
		Battery and torture, Article 126 of the Criminal Code of Ukraine	0	0	0	0	0	0
		Torture, Article 127 of the Criminal Code of Ukraine	0	0	0	0	0	0
	Violation of equality of citizens depending on their race, nationality, religious beliefs, disability and other grounds, Article 161 Criminal Code of Ukraine		57	4	4	53	31	16
	Importation, manufacture or distribution of works that promulgate violence and cruelty, racial, national or religious intolerance and discrimination, Article 300 Criminal Code of Ukraine		5	0	0	5	0	0

* Excluding criminal offenses removed from the records due to the closure of proceedings pursuant to paragraphs 1, 2, 4-1, 6, and 9-1 of Part 1 of Article 284 of the Criminal Procedure Code of Ukraine

III. Integration and inclusion

Ukrainian legislation guarantees equal access to quality education for all learners irrespective of origin, status or ethnicity, including migrant children, internally displaced persons and representatives of the Roma community. The Ministry of Education and Science of Ukraine is consistently implementing measures supporting study of the State language, intercultural dialogue and psychosocial support in educational institutions and is prepared to continue improving the regulatory framework and practical tools for systemic integration of all participants in the educational process.

Medical examinations and emergency medical care for persons who have applied for recognition as refugees or persons in need of complementary protection, as well as persons in respect of whom a decision has been taken to process documents for resolving this matter, are provided free of charge from budgetary funds pursuant to paragraph 4 of the Procedure approved by Resolution of the Cabinet of Ministers of Ukraine No. 121 of 19 March 2014. Persons recognised as refugees or persons in need of complementary protection receive medical care under the conditions established for citizens of Ukraine, taking into account paragraph 3 of the aforementioned Procedure and the Law of Ukraine “On State Financial Guarantees of Healthcare Services for the Population”. The mechanism for reimbursement of the cost of healthcare services applies to foreigners temporarily staying in Ukraine who do not fall within the categories protected by law, unless otherwise provided for by an international treaty of Ukraine. The Ukrainian side therefore considers that any statement suggesting mandatory reimbursement by asylum seekers for emergency medical care should be revised. The recommendation to expand their access to primary and planned healthcare beyond the scope of the guarantees

currently in force may be considered separately as a proposal for legislative amendments, subject to the identification of appropriate sources of funding and with the involvement of the relevant central executive authorities.

To facilitate access to free legal aid for members of the Roma national minority, lawyers within the free legal aid system conduct outreach consultations in areas with a high concentration of Roma communities, organise legal-awareness raising activities and cooperate with civil-society and charitable organisations representing interests of the Roma community. Between 1 January 2025 and 30 June 2026, free legal aid centres provided free primary legal aid to 766 persons who identified as members of national minorities, including 763 members of the Roma national minority and three members of the Crimean Tatar national minority. Free secondary legal aid was provided to 37 persons who identified as members of national minorities, all of whom were persons belonging to Roma minority. The issues raised by representatives of the Roma national minority primarily concerned the processing of documents certifying identity and confirming Ukrainian citizenship, as well as the state registration of civil-status records, including births, deaths and name changes.

The free legal aid system conducts ongoing legal-education activities aimed at increasing legal awareness, preventing human-rights violations, ensuring equal access to justice and informing the public about legal remedies. In 2025, it prepared and disseminated 10 information posts through the system's official social media channels concerning free legal aid for members of the Roma national minority, non-discrimination in access to legal aid, documentation and related issues, with a total reach of 144,720 people. In 2026, information on the availability of free legal aid for members of the Roma national minority was disseminated through official social-media pages and viewed more than 10,000 times. To improve access to legal information for members of national minorities (communities) and indigenous people, the Coordination Centre for Legal Aid has also developed the flagship project concept "Barrier-Free Access to Legal Information for National Minorities". In cooperation with the joint project of the EU and the Council of Europe "Supporting the Implementation of European Standards on Combating Discrimination and the Rights of National Minorities in Ukraine," a number of the most popular legal consultations have been translated into Hungarian, Armenian, and Romani.

The indicators cited in the Report concerning the level of education of the Roma population need to be used with caution, as ECRI itself notes that the available data vary. The lack of a single, up-to-date and representative set of statistics by nationality does not provide grounds for automatically using the indicators cited as a characteristic of the entire Roma community of Ukraine. At the same time, Ukraine recognises the need to ensure equal access for Roma children and youth to quality education and supports measures aimed at increasing their educational coverage and preventing early school leaving.

Ukraine takes into account information about the increased risk of Roma girls dropping out of school. The reasons for this phenomenon are complex and may be related not only to the educational process, but also to social, economic, family and other circumstances. Dropout prevention requires targeted work by educational institutions with pupils and their families and interaction with local self-government bodies, services for children, social services and representatives of Roma communities.

Ensuring actual school attendance among children living in compact Roma settlements requires a comprehensive approach, since the reasons for irregular attendance and dropout may be related not only to educational but also to social, economic, housing and other factors. Ukraine supports information and educational work on the importance of education and interaction of educational institutions with parents, local self-government

bodies, social services and representatives of Roma communities. The involvement of Roma mediators can be an effective tool for communication with families, but requires appropriate organisational and resource support at the local level.

The Ukrainian side considers it appropriate to strengthen targeted support for Roma children, in particular by ensuring access to distance and blended learning, supporting preschool preparation, preventing dropouts, and conducting information and educational work with families. At the same time, it should be noted that Ukrainian legislation does not define a separate concept of “mobile educational institution” or “mobile school” as a separate organisational form of obtaining education. The Ukrainian legislation in the field of education provides for the possibility of organising the educational process taking into account the needs of students and the characteristics of their place of residence. In particular, in the event of an insufficient number of students to form a class, a class-set may be formed in which the educational process is carried out for students of different classes according to the appropriate organisation of training. Thus, the ECRI recommendation to ensure access of Roma children to "mobile educational institutions" can be implemented within the framework of the forms of organisation of the educational process provided for by law, in particular by creating set classes and other forms of organisation of education, taking into account the number of children, the characteristics of their residence and the needs of the relevant territorial community.

Existing education legislation permits the organisation of the educational process taking into account learners' needs and the characteristics of their place of residence. In particular, where there are insufficient pupils to form a class, a set class may be established in which the educational process is organised for pupils from different grades. The Ukrainian side therefore proposes clarifying ECRI's terminology by referring to ensuring children's access to educational services through forms of organisation of the educational process provided for by law, including set classes. As regards special educational programmes for Roma women and girls, the Government considers it a priority to ensure their equal access to existing educational opportunities and targeted support in cases of dropout risk. The introduction of separate special programmes should be based on confirmed educational needs and appropriate monitoring.

Measures aimed at further ensuring equal access of Roma children to quality education and preventing dropout should be implemented taking into account the national policy of ensuring access to education under martial law and should avoid discriminatory approaches towards other categories of children in difficult life circumstances. The Government also considers it appropriate to strengthen targeted support for Roma children, including access to distance and blended learning, preschool preparation, dropout prevention and information and educational work with families.

The Government does not support any manifestations of discrimination or harassment based on nationality. Educational institutions are obliged to provide a safe educational environment and to respond to cases of bullying and discrimination. At the same time, an assessment of the scale of antigypsyism in educational institutions requires up-to-date and systematic data on relevant incidents. The Ukrainian side considers it appropriate to strengthen preventive work, legal-awareness measures and teacher training on non-discrimination. The full-scale war of aggression has created additional obstacles to continuity of education, particularly for children who lack adequate access to digital devices, stable internet connections and electricity. These problems are not unique to Roma children and require a system-wide response. Additional difficulties faced by socially vulnerable children should be taken into account when organising face-to-face, distance and blended learning.

Ukraine recognises the importance of access to preschool education for Roma children as one of the factors contributing to successful adaptation to schooling. Ensuring accessibility of preschool education, particularly for children from socially vulnerable categories, requires further cooperation between State and local authorities and depends substantially on the capacity of territorial communities to provide an appropriate network of institutions and accessible educational services. Professional preparation of teachers for work in culturally and socially diverse settings is already taken into account in the system of teachers' professional development. At the same time, the Government takes into account the need to further strengthen practical teacher preparation for work with children with different educational and social needs, including children belonging to the Roma national minority.

The Government considers that the mere fact of a high proportion of Roma pupils in a particular educational institution cannot automatically indicate discriminatory segregation. As the ECRI report itself states, the concentration of Roma students in some schools may be due to the structure of their residence, as well as the linguistic needs and educational preferences of families. At the same time, Ukraine does not support any cases of forced or discriminatory referral of children to specific educational institutions on the basis of nationality. Each such case should be assessed taking into account the actual circumstances, the enrolment procedure, parents' ability to freely choose an educational institution, and the presence or absence of discriminatory practices.

Ukraine does not support practices that create unjustified obstacles to the enrolment of children in educational institutions. Internally displaced person status cannot constitute a ground for restricting a child's right to education. Where administrative difficulties arise in the enrolment of internally displaced children, the matter should be resolved in accordance with the procedure established by law, with the involvement of education-management bodies.

Ukraine is also ready to cooperate with the Council of Europe and other international partners on improving access to education for Roma children and developing an inclusive educational environment.

The State Employment Service of Ukraine implements a comprehensive set of measures aimed at ensuring effective and equal access to employment services and social support, including for members of the Roma national minority. Services are provided through a case-management approach based on the principles of individualisation, comprehensiveness, continuity and inclusiveness. The State Employment Service ensures equal access to its programmes and services without differentiation on the grounds of ethnic origin, social background or any other characteristic.

Pursuant to Article 11 of the Law of Ukraine "On Employment of the Population", the State guarantees protection against any form of discrimination in employment. All citizens, irrespective of whether they belong to vulnerable groups, are entitled to employment assistance, vocational training, counselling and social protection in the event of unemployment. Persons belonging to the Roma national minority participate in general employment programmes without separate or segregated mechanisms and may receive employment assistance tailored to their skills and labour-market needs, access to vocational education and training, including retraining, participation in public and other temporary employment programmes, as well as information, counselling and vocational-guidance services, including support for starting a business.

In the first half of 2026, 79 persons belonging to the Roma national minority, including 54 women, received services from the State Employment Service; 56 persons, including 43 women, had registered unemployed status; 28 persons belonging to the Roma national minority, including 14 women, were placed in employment; seven persons, all women,

participated in public and other temporary employment programmes; and 120 persons belonging to the Roma national minority, including 79 women, received information and counselling services.

Access to medical care does not depend on ethnic origin. Absence of an identity document may complicate patient identification, registration in the electronic healthcare system and access to certain planned services, but it cannot constitute a ground for refusing emergency medical care. The Ukrainian side therefore considers that the relevant issue should be characterised as a documentary and administrative barrier that creates a risk of limiting actual access to certain medical services, rather than as a restriction established by law on the grounds of ethnicity.

IV. Topics specific to Ukraine

The legal basis for the activities of the State Border Guard Service of Ukraine includes Articles 19, 21 and 24 of the Constitution of Ukraine, the Law of Ukraine “On the Principles of Preventing and Combating Discrimination in Ukraine” and other legislation guaranteeing equality and prohibiting discrimination. Border-control measures, including document checks, identity verification and establishing lawful grounds for crossing the State border, are conducted under the Law of Ukraine “On Border Control” and may not be based on racial, ethnic, national or other discriminatory grounds. Decisions concerning border crossing are based on legislation and documents confirming the existence or absence of lawful grounds for crossing, irrespective of a person’s gender identity. The State Border Guard Service supports further professional training and awareness-raising on prevention of discrimination, racism, xenophobia, religious intolerance and LGBTI-phobia, while asking that the normative and organisational mechanisms already in place be taken into account.

The Ukrainian side notes that reports of possible manifestations of racist or LGBTI-phobic behaviour in the Armed Forces of Ukraine should be assessed in the light of ECRI’s conclusion in paragraph 94 of the report. According to information provided by civil society representatives and referred to by ECRI, attitudes towards LGBTI service personnel in the Armed Forces of Ukraine are predominantly tolerant, while such manifestations and incidents are not of a structural or institutional nature and, as a rule, are met with an appropriate response.

Legal and institutional mechanisms for preventing and combating discrimination are in place within the Armed Forces of Ukraine. Paragraph 2 of the Procedure for the Provision of Clothing, Medical, Psychological and Social Support to Service Personnel Taking into Account the Needs of Women and Men, approved by Resolution of the Cabinet of Ministers of Ukraine No. 1234 of 29 October 2024, expressly prohibits any discrimination against service personnel, including on the grounds of race, religious and other beliefs, ethnic origin, gender identity and sexual orientation.

These mechanisms were strengthened in 2026. Law of Ukraine No. 4797-IX of 25 February 2026 introduced amendments to the Disciplinary Statute of the Armed Forces of Ukraine and the Statute of the Internal Service of the Armed Forces of Ukraine which, inter alia, clarified the duties of service personnel with regard to compliance with non-discrimination legislation and strengthened mechanisms for reporting and official responses to cases of discrimination on the grounds of sex, sexual harassment and gender-based violence. In addition, Resolution of the Cabinet of Ministers of Ukraine No. 226 of 18 February 2026 approved the Procedure for Responding to Cases of Discrimination on the Grounds of Sex, which applies to the Armed Forces of Ukraine and provides, inter alia, for the establishment of standing commissions to consider relevant complaints.

The Ukrainian side supports the consistent application and further strengthening of these mechanisms, appropriate training of personnel, responses to manifestations of intolerance, and the effective consideration of reports of possible violations. At the same time, the assessment of the situation in the Armed Forces of Ukraine should take into account the legal mechanisms already in place, as well as ECRI's conclusion in paragraph 94 that such manifestations and incidents are not of a structural or institutional nature.

As regards the information referred to in paragraph 95 concerning more than 150 cases of possible ill-treatment and physical violence against Jehovah's Witnesses, the Ukrainian side considers it necessary to distinguish between reports or allegations of possible violations and facts established by the competent authorities. The report does not contain information on the outcome of the official examination of each such report. The figure referred to should therefore be understood as the number of reports of possible violations, rather than as the number of established violations.

The Ukrainian side considers that the wording "the current mobilisation, under which conscientious objection has been ruled out" does not fully reflect the applicable legal framework. The issue is not a non-recognition by Ukraine of freedom of thought, conscience and religion or of conscientious objection as such; rather, under martial law the legislation does not currently provide a general mechanism for replacing military service during mobilisation with alternative (non-military) service on grounds of conscientious objection. Mobilisation measures are being carried out in the context of the ongoing full-scale armed aggression of the Russian Federation against Ukraine and are required for the defence of the State and the exercise of Ukraine's inherent right of self-defence. At the same time, Ukraine is working on the legislative regulation of alternative (non-military) service under martial law. Relevant legislative proposals are currently being prepared by the Ministry of Economy and Environment of Ukraine.

With regard to information concerning criminal proceedings against Jehovah's Witnesses, the Ukrainian side considers it appropriate to avoid duplication in the presentation of the relevant figures. In particular, the statement that 7 cases had been sent to court should not be repeated where the same information is provided in the immediately following sentence.

The Ukrainian side considers that an important factual clarification is required concerning the legislative measures relating to religious organisations. In August 2024, the Parliament of Ukraine adopted Law No. 3894-IX "On the Protection of the Constitutional Order in the Activities of Religious Organisations". Following the entry into force of the Law, over the next nine months DESS developed, and the Government of Ukraine adopted, a number of regulatory acts necessary for its implementation. On the basis of one of those acts, Resolution No. 543 of 9 May 2025, DESS completed in July 2025 a research of the main legal entity of the Ukrainian Orthodox Church (UOC), the Kyiv Metropolis of the UOC. The Kyiv Metropolis of the UOC is a religious organisation and legal entity which acts on behalf of the UOC religious association, represents it in organisational and canonical matters and exercises leadership of the UOC religious association. In August 2025, DESS concluded that the Kyiv Metropolis of the UOC had not complied with the proposed measures and filed a claim with the court seeking the termination of the Kyiv Metropolis of the UOC as a legal entity in accordance with the above-mentioned Law. The proceedings were still ongoing at the time of ECRI's 2025 visit.

The Ukrainian side also considers it necessary to clarify the terminology used in describing the relevant procedure. When referring to the measure issued by DESS for the elimination of violations of the legislation on freedom of conscience and religious organisations, the legally appropriate term is "*Prescription*", rather than "order".

The Ukrainian side does not share the concerns that the measures provided for by the Law may unduly affect the equal treatment of believers belonging to the religious communities concerned in the exercise of their right to freedom of religion. The Law is not directed against any particular religious organisation, association, denomination or religious tradition as such. It applies to religious organisations, denominations and religious traditions operating in Ukraine where they violate the applicable legislation.

The Ukrainian side also considers it necessary to clarify that the measures provided for by the Law do not entail a risk of disproportionately affecting the principle of equal treatment of the faithful and religious communities of the Ukrainian Orthodox Church (UOC). Under the Law, religious organisations affiliated with the Russian Orthodox Church (ROC) are required to sever their affiliation with it. To this end, they are provided with ample opportunities to do so within the framework of a clearly defined procedure.

Where there is substantiated information concerning the links of a particular religious organisation with the ROC, which is prohibited in Ukraine, DESS is empowered to conduct a research to determine whether such affiliation exists. If the research establishes such affiliation, DESS issues a “Prescription on the elimination of violations of the legislation on freedom of conscience and religious organisations” to the religious organisation concerned. If the identified violations are remedied, the Law is not applied to that religious organisation.

The Prescription must be complied with within 30 days. Where a religious organisation requires additional time to remedy the violations, this period may, upon its reasoned request, be extended by a further 60 days. If the Prescription is not complied with, DESS is entitled to apply to the court seeking termination of the religious organisation. Until the court delivers its final decision, the religious organisation retains the possibility of complying with the Prescription and remedying the identified violations.

The Law pursues a legitimate aim, namely preventing the operation in Ukraine of structures of a religious organisation recognised as a “propaganda mouthpiece of the Kremlin” in PACE Resolution No. 2540 (2024). It does not constitute automatic punishment, since it provides an opportunity to remedy identified violations; it does not entail collective punishment, since each religious organisation is assessed individually; it provides a democratic procedure for remedying identified violations and for a court to take the final decision on the termination of a legal entity; and it does not impose a burden on the conscience of believers, since it neither prohibits faith nor concerns doctrinal matters, but requires withdrawal from the structure of a hostile organisation.

The Law “On the Protection of the Constitutional Order in the Sphere of Activities of Religious Organisations” does not restrict freedom of religion but protects constitutional order under wartime conditions. Article 9 of the European Convention on Human Rights permits restrictions on the manifestation of religion in the interests of public safety, for the protection of public order, health or morals, or for the protection of the rights and freedoms of others. The European Court of Human Rights recognises that States may assess the activities of religious organisations whose governing centres are located outside their territory, as well as the activities of their representatives, from the perspective of public safety, public order, and the protection of the democratic constitutional order and, where a genuine and sufficiently substantiated threat to those interests exists, may adopt appropriate restrictive measures (*HUDOC – Jehovah's Witnesses of Moscow and Others v. Russia; Moscow Branch of the Salvation Army v. Russia; Nolan and K. v. Russia; Hizb ut-Tahrir and Others v. Germany*). Such measures must be prescribed by law, pursue a legitimate aim, and satisfy the requirements of necessity and proportionality. Particular significance may arise where the aims or activities of such an organisation, or of its foreign governing centre, are incompatible with

the principles of a democratic society or pose a threat to public safety, territorial integrity, or the constitutional order.

The Russian Orthodox Church officially and openly supports the war against Ukraine, blesses the occupying army and provides ideological justification for the genocide of Ukrainians, which makes religious links with it a direct threat to the constitutional order of Ukraine.

At the same time, the Law applies equally to all religious organisations in Ukraine regardless of denomination. The determining criterion is the existence or absence of links with the aggressor State. It does not regulate canonical dogma, the manner of prayer or the internal religious rites of religious communities. What is prohibited is administrative, organisational and legal subordination to religious centres in the Russian Federation, the State waging a war of aggression against Ukraine. Ukrainian legislation does not criminalise the religious views of individual citizens or believers. No person is prosecuted by Ukrainian law enforcement authorities on account of their religious beliefs, which fully refutes assertions concerning “restrictions on the equal treatment of believers”.

As regards concerns about a potential increase in societal mistrust towards believers belonging to the religious communities concerned, the Ukrainian side considers that the available sociological data do not provide objective confirmation of such a trend. In the course of its analysis of societal processes in the field of religion, DESS examined the 2025 materials of the Razumkov Centre, which has conducted annual sociological research on the church and religious situation in Ukraine for 25 years. According to the Razumkov Centre, almost 63% of respondents stated that full freedom of conscience and equality of religions before the law exist in Ukraine.

Among respondents identifying as Orthodox Christians, 72.2% identified with the Orthodox Church of Ukraine (OCU), while 9.3% identified with the UOC in unity with the Moscow Patriarchate. Despite the negative attitudes in Ukrainian society towards religious organisations whose governing centre is located in the aggressor state, these attitudes do not extend to the ordinary members of such organisations. For example, nearly 60% of respondents expressed a negative attitude towards the Ukrainian Orthodox Church (UOC) in unity with the Moscow Patriarchate (MP), headed by Metropolitan Onufrii. The proportion of respondents who consider relations between members of different religious groups in the locality where they live to be conflictual did not exceed 6.4%. At the same time, the overwhelming majority of respondents (almost 68%) described relations between adherents of different churches and religions in their locality as peaceful (58.8%) or friendly (9.1%). Non-religious respondents stated that they were indifferent towards representatives of religions or denominations (more than 50%) or had not given the matter any thought (20%).

These trends are also confirmed by a survey conducted by the Rating Group in May 2026. According to the survey, 74% of respondents consider relations between adherents of different churches and religions in the locality where they live to be friendly (20%) or peaceful (54%).

The data presented above confirm that the legislative regulation of the activities in Ukraine of religious organisations seeking to maintain administrative and organisational ties with the banned Russian Orthodox Church (ROC) is well-founded. Against this background, the Ukrainian side considers that the assertion concerning “growing societal mistrust” is not objectively substantiated. DESS has also reported that it has no information establishing discriminatory treatment of members of UOC religious communities in the enjoyment of their fundamental rights and freedoms, including the rights to work and social protection, participation in public and political life, and access to justice.

Concluding observations

Ukraine reiterates its firm commitment to constructive cooperation with ECRI and to the continued implementation of international and European standards in the areas covered by the report. The Government respectfully requests that the factual clarifications, legislative and policy developments, institutional mechanisms and updated data set out above be taken into account alongside ECRI's findings and recommendations.

Ukraine remains ready to continue its professional dialogue and cooperation with ECRI, including with regard to the recommendations selected for interim follow-up. Despite the ongoing war of aggression of the Russian Federation against Ukraine, Ukraine continues to fulfil its international obligations and advance its work to safeguard human rights and fundamental freedoms, strengthen equality and non-discrimination, and pursue reforms in line with European standards.

ECRI Secretariat
Directorate General of Democracy
Council of Europe
Tel.: +33 (0) 3 90 21 46 62
Email: ecri@coe.int

www.coe.int/ecri
 [@ECRI_CoE](https://twitter.com/ECRI_CoE)

www.coe.int

The European Commission against Racism and Intolerance (ECRI) is a unique human rights monitoring body which specialises in questions relating to the fight against racism, discrimination (on grounds of “race”, ethnic/national origin, colour, citizenship, religion, language, sexual orientation and gender identity), xenophobia, antisemitism and intolerance in Europe; it prepares reports and issues recommendations to member States.