

LABOUR MARKET (RE-)INTEGRATION AND SKILLS DEVELOPMENT FOR PERSONS WITH DISABILITIES – UKRAINE

Country note

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PREFACE

The Country Note presents the situation in Ukraine related to labour market integration and skills development for persons with disabilities with special attention on the role of Active Labour Market Policy and Measures.

The European Training Foundation (ETF) initiated a mapping of policies and programmes for labour market (re-)integration and skills development for persons with disabilities in several Partner countries, in response to the European Union's priority to foster social inclusion and economic autonomy of persons with disabilities through employment, as per priorities set out in the EU Disability Employment Package.

The main objectives were to conduct a systemic, comparative policy analysis of the support for employment of persons with disabilities and to identify needs for strengthening the capacity of actors in selected EU neighbouring countries.

The analysis was conducted in accordance with the framework proposed by the EU Disability Employment Package, with a particular focus on Active Labour Market Policies and skills development dimensions.

In Ukraine, the methodology consisted of desk review and face-to-face and online interviews with main stakeholders active in the area of promotion of employment and inclusion of persons with disabilities. The detailed list of interviewees appears in annex.

staff and resources. The State Statistics Service of Ukraine (UKRSTAT) stopped publishing employment statistics¹⁰. As stipulated by the Law of Ukraine 'on the Legal Regime of Martial Law'¹¹, access to statistics on the number of individuals with disabilities, will no longer be publicly available. The necessary information shall be obtained on requests from the relevant state authorities¹².

Some statistics about persons with disabilities are available through the websites of relevant ministries. However, the information is not disaggregated and often does not reflect the difference in the position of women and men with disabilities:

- The Ministry of Social Policy of Ukraine¹³ informs about the total number of persons with disabilities, along with general information on compliance with the norms of the UN CRPD, existing state support systems, available rehabilitation services and state compensations. The Ministry also publishes data on the internally displaced persons (IDPs), including persons with disabilities, who make up approximately 22% of the total number of IDPs¹⁴;
- The Ministry for Veterans Affairs of Ukraine, through DIIA portal, reports the number of people serving in the Defence Forces of Ukraine¹⁵ (1 071 499), and the number of individuals who acquired disabilities due to the war (119 678 as of 1 January 2025). On its Analytical Platform¹⁶, the Ministry reports the total number of veterans – 851,068 as of 1 January 2022.

The State Statistics Service¹⁷ reports data on the Social Security of Ukraine Population, including data on persons with disabilities and war-disabled persons.

Table 1: Social security data on persons with disabilities and war-disabled persons

(as of the beginning of the year)	2021	2022	2023	2024
Total number of war-disabled persons	109,202	107,084	103,491	109,874
Group I	7,294	5,998	5,155	5,192
Group II	59,354	59,790	59,087	62,374
Group III	42,554	41,296	39,249	42,308
Out of total number – persons who are registered in the pension fund	67,460	64,719	62,729	63,811

Additionally, data on officially employed persons with disabilities in Ukraine is presented by the Confederation of Employers of Ukraine (CEU) on its Platform 'RAZOM' (lit. 'TOGETHER'), based on the information provided by the Pension Fund of Ukraine (2022-2025)¹⁸. According to this Platform, as of 1 January 2025, 476,482 were officially employed, compared to 437 785 in 2023. About 78% of

¹⁰ State Statistics Service of Ukraine, *Official Website*, [online]. Last accessed 17 April 2025 at: <https://www.ukrstat.gov.ua>.

¹¹ Law of Ukraine on Legal Regime of Martial Law, [online]. Last accessed 20 December 2024 at: <https://zakon.rada.gov.ua/laws/show/389-19#Text>.

¹² Law of Ukraine on Access to Public Information, [online]. Last accessed on 2 April 2025 Available at: <https://zakon.rada.gov.ua/laws/show/2939-17#Text>.

¹³ State Enterprise 'Information and Computer Center of the Ministry of Social Policy of Ukraine'. Analytics, [online]. Last accessed 20 December 2024 at: <https://www.msp.gov.ua/>.

¹⁴ The Ministry of Social Policy of Ukraine, [online]. Last accessed 2 April 2025 at: <https://www.ioc.gov.ua/en/analytics/dashboard-vpo>.

¹⁵ Platform DIIA. Statistics, [online]. Last accessed 20 December 2024 at: <https://data.gov.ua/dataset/034f43a4-133a-498f-8478-6076ed1013e4/resource/7c18d53c-e79b-469e-8c03-6e4d44fc0cd5> and <https://mva.gov.ua/statistichni-dani-2>.

¹⁶ Ministry for Veterans Affairs of Ukraine. (n.d). Lack of Employment Opportunities for Veterans with Disabilities, [online]. Last accessed 20 December 2024 at: <http://surl.li/pvrei> (Platform: <https://data.mva.gov.ua>).

¹⁷ State Statistics Service of Ukraine, **Publications on Social Protection**, [online]. Last accessed 30 January 2025 at: https://ukrstat.gov.ua/druk/publicat/kat_u/publizhist_u.htm.

¹⁸ Конфедерація роботодавців України, **Інформаційно-аналітична система 'Працевлаштування осіб з інвалідністю в Україні'**, [online]. Last accessed 30 January 2025 at: <https://pwd.employers.org.ua/ua/analytics>.

employed persons with disabilities work at enterprises with 26 or more employees, while smaller enterprises with 8 to 25 employees and those with fewer than 8 employees employ approximately 12% and 10% of persons with disabilities, respectively.

The gap in the availability of statistical information has been highlighted in the interviewees' responses, especially regarding veterans with disabilities, people with different types of disabilities, people with intellectual disabilities, and people who are institutionalised:

'We have a single state register of veterans. But now it is closed for some reason. We have a full-scale war going on and we cannot release those numbers. If you need to know something, you can always make an official request to the Ministry, and they will help you find the necessary information [...] many registries are currently closed' **Ministry for Veterans Affairs**

'What are the statistics? How many of them are working, how many are in boarding homes ["internats"]? Boarding homes have all of them - with intellectual, mental (disorders), aged, children, with physical disabilities - all together, not separated, we know nothing about them, there is no statistical data, no one collects it and does not consider it necessary.' **NGO**

'We still cannot say for sure how many blind people [...] and how many deaf people there are in Ukraine, how many people with disabilities of the first group who move around in wheelchairs. We still don't know. Because our data fluctuates depending on what we say. Five per cent of the population are people with disabilities. Because we account for them either through social assistance payments, or through disability pensions, or on some other basis. But social policy does not have clear statistics on the number of people and children with disabilities. The numbers are approximate, and do not correspond to the real situation.' **NGO**

Collecting information about persons with disabilities during the war is complicated and requires additional resources. There is lack of information on persons who acquired a conflict-related disability, persons with disabilities who have died in that context or are internally displaced, refugees and asylum-seekers, including those living outside formal camps or resettlement areas and those in refugee-like situations¹⁹. The Ministry for Veterans Affairs estimates that by the end of hostilities, the number of veterans and their families will rise to 5 – 6 million²⁰. Many are expected to receive the status of persons with disabilities, which probably will prevent them from returning to their previous jobs. Referring to a rapid increase in the number of disabled veterans, an interviewee from the Ministry for Veteran Affairs provided numbers indicating that persons with disabilities account for 10-11% of all war veterans:

'...with the start of demobilisation, there will be much more of this category of people. For example, before the full-scale invasion, there were 850 000 veterans. Currently, we have one million three hundred registered veterans. If we talk about persons with disabilities as a result of the war, then we currently have more than 114 000 persons [...].' **Ministry for Veterans Affairs**

¹⁹ Committee on the Rights of Persons with Disabilities (2024), *Concluding observations on the combined second and third periodic reports of Ukraine*, 2 October. Available at: <https://digitallibrary.un.org/record/4063153?v=pdf> (Accessed: 3 April 2025).

²⁰ ReliefWeb (2025), *Ukraine: Veterans' Reintegration Assessment in Frontline Oblasts*. Available at: <https://reliefweb.int/report/ukraine/ukraine-veterans-reintegration-assessment-frontline-oblasts-march-2025> (Accessed: 10 April 2025).

2. STRATEGIC AND INSTITUTIONAL FRAMEWORK

2.1 Institutional framework

Ukraine has three responsible central executive agencies for support of persons with disabilities including their employment, i.e. the Ministry of Social Policy of Ukraine; the Ministry for Veterans Affairs of Ukraine; and the Ministry of Economy of Ukraine.

The **Ministry of Social Policy** of Ukraine is the central executive body responsible for the formation and implementation of state social policy. Its main goal is to ensure social protection of all citizens, focusing on social security, labour, employment, family policy, support for persons with disabilities, pension reform, and many other areas²¹. Key functions and tasks include developing and implementing social support programmes for various categories of the population; regulating the provision of state social benefits and subsidies; overseeing pension policy and reform; promoting inclusion, social integration and access to services of persons with disabilities; and monitoring compliance with social standards assessing the effectiveness of social institutions and addressing social policy challenges.

The Ministry of Social Policy coordinates the Fund for Social Protection of persons with disabilities²², which is a non-profit budget institution with several key responsibilities regarding persons with disabilities, namely:

- financial support: Providing various types of social and financial assistance, compensations and payments, including the provision of free assistive devices and equipment to persons with disabilities;
- integration support: Providing assistance in obtaining education, vocational training and employment, and other information including the implementation of the workplace employment quota system²³;
- accessibility improvement: Ensuring the accessibility of infrastructure for persons with disabilities, including transport, buildings, information and communications systems;
- providing rehabilitation: Organising medical and social services aimed at the rehabilitation, restoration of health, and improvement of the living standards of persons with disabilities;
- cooperation with Organisations for persons with disabilities (ODPs)²⁴.

The **Ministry for Veterans Affairs** of Ukraine is responsible for the state policy regarding such groups as war veterans, combatants, persons with disabilities²⁵. It coordinates the activity of The Ukrainian Veterans Foundation²⁶ and collaborates with state bodies to ensure veterans rights to healthcare, education, employment and social protection. The Ministry's key functions include:

- development of policies and regulations on social protection of war veterans, combatants, persons with disabilities, as well as their families;

²¹ Cabinet of Ministers of Ukraine Resolution on approval of regulations on Ministry of Social Policy of Ukraine, [online]. Last accessed 10 April 2025 at: <https://zakon.rada.gov.ua/laws/show/423-2015-n#Text>.

²² Social Protection Fund for Persons with Disabilities (Про затвердження Положення про Ф... | від 14.04.2011 № 129), [online]. Last accessed 10 April 2025 at: <https://zakon.rada.gov.ua/laws/show/z0528-11#Text>.

²³ The Fund for Social Protection. Public information (data on enterprises that contribute to quota placements of PwD), [online]. Last accessed 10 April 2025 at: <https://www.ispf.gov.ua/diyalnist/publicna-informaciya>.

²⁴ Фонд соціального захисту осіб з інвалідністю, **Взаємодія з громадськими об'єднаннями осіб з інвалідністю**, [online]. Last accessed 10 April 2025 at: <https://www.ispf.gov.ua/diyalnist/monitoring-zahodiv-vgoi-perelik-profesij-utos-utog/vzayemodiya-z-gromadskimi-obyednanniyami-osib-z-invalidnistyu>.

²⁵ Regulation on the Ministry of Veterans Affairs of Ukraine, [online]. Last accessed 10 April 2025 at: <https://mva.gov.ua/about-the-ministry/category/199-normativno-pravovi-zasadi-diyalnosti/polozhennya-pro-ministerstvo-u-spravah-veteraniv-ukraini>.

²⁶ Ukrainian Veterans Foundation, **Official Website**, [online]. Last accessed 10 April 2025 at: <https://veteranfund.com.ua/en/ukrainian-veteran-fund/>.

- support for veterans and their families, organisation of rehabilitation programmes, psychological assistance and social adaptation²⁷;
- cooperation with veteran organisations and the implementation of state-level initiatives;
- organisation of commemorative events honouring the veterans' contribution to Ukraine's independence, including the celebration of state and national holidays, as well as other events;
- monitoring the implementation of the rights of veterans, particularly in relation to pensions, medical care, housing conditions, and other related matters.

The **Ministry of Economy** of Ukraine plays an important role in ensuring equal opportunities for persons with disabilities in the context of employment. It implements programmes and policies supporting²⁸ labour, employment and self-employment, including for persons with disabilities. These include grants and subsidies for employers and persons with disabilities²⁹. The Ministry actively collaborates with employers in creating jobs for persons with disabilities, ensuring information on legislative requirements, possible tax benefits and other incentives. Additionally, the Ministry monitors employment trends and the effectiveness of implemented measures, conducts advisory and information activities to raise awareness among employers and persons with disabilities about available opportunities in the labour market.

The Ministry of Economy coordinates the activities of the State Employment Service of Ukraine (SES), a centralised system of state institutions³⁰ that implements the state policy in the field of employment and labour migration. SES provides various services to employers, employees and the unemployed. Key functions include periodic analysis of the labour market, provision of employee selection services to employers, and assistance to citizens in organising entrepreneurial activities, in particular, providing individual and group consultations. SES is also involved in vocational training and retraining of the unemployed, including persons with disabilities, and in professional orientation of the population.

In addition, the **Ministry of Health**³¹ governs medical and social examinations to determine disability. Starting from January 2025, the Ministry has been implementing a new system for disability assessment³². The new system focuses on evaluating a person's functional capacity and ability to perform daily tasks. The special unified electronic system will be created based on personal information. The assessment can be carried out either in person at a designated medical facility, on remote basis or at the person's residence.

The **State Employment Service**³³ (SES) of Ukraine, supervised by the Ministry of Economy, plays a key role in supporting the employment of persons with disabilities through job matching, tailored counselling and active labour market measures. It provides vocational guidance, reskilling opportunities and incentives for employers, including wage subsidies and support for workplace adaptation. SES activities are informed by administrative data on jobseekers and vacancies, employer reporting and information exchange with social protection institutions, rehabilitation services and local authorities. While digital service delivery and partnerships with civil society have expanded in response to labour market disruptions, challenges remain in strengthening data integration, employer engagement and sustainable employment outcomes.

²⁷ Міністерство у справах ветеранів України, **е-Ветеран – система інформаційних сервісів для ветеранів**, [online]. Last accessed 10 April 2025 at: <https://eveteran.gov.ua>.

²⁸ Resolution on the Ministry of Economy of Ukraine (Питання Міністерства економіки | від 20.08.2014 № 459), [online]. Last accessed 10 April 2025 at: <https://zakon.rada.gov.ua/laws/show/459-2014-n#Text>.

²⁹ Ministry of Economy of Ukraine, **eRobota: Grants from the state for opening or developing a business**, [online]. Last accessed 10 April 2025 at: <https://me.gov.ua/Documents/Detail?lang=en-GB&id=f26e87de-b597-4634-b77e-53792b7ac4a5&title=Erobota-GrantsFromTheStateForOpeningOrDevelopingABusiness>.

³⁰ Ministry of Economic Development, Trade and Agriculture of Ukraine. Order on Approval of regulations on State Employment Service, [online]. Last accessed 10 April 2025 at: <https://zakon.rada.gov.ua/laws/show/z1305-20#Text>.

³¹ The Ministry of Health of Ukraine: <https://moz.gov.ua/uk/nova-sistema-ocinyuvannya-povsyakdenного-funkcionuvannya-ta-roboty-ekspertnih-komand-ekopfo-u-zapitanniah-ta-vidpovidyah-paciyentam>.

³² https://drc.ngo/media/v1bpwq0a/legal-alert-113_special-issue-on-disability-assessment-reform.pdf.

³³ https://dcz.gov.ua/?utm_source=chatgpt.com.

2.2 Coordination and cooperation mechanisms

According to the second and third report on the implementation of the UN CRPD, submitted in 2020³⁴, the advisory bodies in Ukraine are:

- Standing Working Group under the Commissioner of the President of Ukraine for the Rights of persons with disabilities;
- Public Council under the Verkhovna Rada Committee on Social Policy and Protection of Veterans' Rights;
- Ukrainian Parliament Commissioner for Human Rights (Ombudsman)³⁵.

There is an ongoing inter-organisational cooperation, especially in supporting veterans with disabilities and their families.

The responsibilities regarding the coordination of employment of persons with disabilities in Ukraine are clearly divided between the **Ministry of Economy and the Ministry of Social Policy** regulated by the Law of Ukraine 'On the Fundamentals of Social Protection of persons with disabilities in Ukraine', as well as other laws and regulations relating to social security and employment.

Both ministries cooperate to ensure the implementation of the state policy of inclusion. In particular, the Ministry of Economy actively works on legal and economic conditions and monitors compliance of businesses with quotas for the employment of persons with disabilities, and the Ministry of Social Policy organises social rehabilitation and support, focuses on social aspects and creating conditions for rehabilitation and integration.

The Ministry of Social Policy promotes active cooperation with public associations of persons with disabilities on a partnership basis in accordance with the UN CRPD, the Optional Protocol, The National Action Plan for the implementation of the UN CRPD³⁶ and other regulations³⁷. The Ministry also conducts regular public consultations with public representatives to improve the quality of decision-making on important issues of state and public life³⁸. Whereas general information about existing coordination and cooperation is regularly updated on the Ministry website, specific details about cooperation with ODPs is quite sparse.

Some separate initiatives are being adopted and implemented. For instance, the Ministry of Social Policy, with the support of the Union of Public Organisation of Disabled People of Kyiv, has updated the Online Electronic Cabinet for People with Disabilities, incorporating new accessibility requirements³⁹.

Various coordinating activities are periodically organised by different government representatives. For instance, in October 2024 a roundtable meeting on the topic of 'Interaction of State Institutions on

³⁴ Office of the United Nations High Commissioner for Human Rights (OHCHR), ***Examen de l'Ukraine au CRPD: bien que le Comité soit conscient et regrette***, [online]. Last accessed 10 April 2025 at: https://www.ohchr.org/en/meeting_summaries/2024/08/examen-de-lukraine-au-crp-d-bien-que-le-comite-soit-conscient-et-regrette.

³⁵ Ukrainian Parliament Commissioner for Human Rights, ***Official Website***, [online]. Last accessed 10 April 2025 at: <https://www.ombudsman.gov.ua/en/>.

³⁶ Cabinet of Ministers of Ukraine, **Government endorses a National Action Plan for the implementation of the Convention on the Rights of Persons with Disabilities until 2025**, [online]. Last accessed 10 April 2025 at: <https://www.kmu.gov.ua/en/news/uryad-zatverdiv-nacionalnij-plan-dij-z-realizaciyi-konvenciyi-pro-prava-osib-z-invalidnistyu-na-period-do-2025-roku>. Кабінет Міністрів України, **Розпорядження № 285-р від 7 квітня 2021 року 'Про затвердження Національного плану дій з реалізації Конвенції про права осіб з інвалідністю на період до 2025 року'**, [online]. Last accessed 10 April 2025 at: <https://zakon.rada.gov.ua/laws/show/285-2021-p#n17>.

³⁷ Ministry of Social Policy of Ukraine, **Disability – Information and Services**, [online]. Last accessed 10 April 2025 at: <https://www.msp.gov.ua>.

³⁸ Ministry of Social Policy of Ukraine, **Public Consultations – Reports and Materials**, [online]. Last accessed 10 April 2025 at: <https://www.msp.gov.ua>.

³⁹ Ministry of Social Policy of Ukraine, **Updated Electronic Cabinet for Persons with Disabilities: What's New**, [online]. Last accessed 10 April 2025 at: <https://www.msp.gov.ua>.

Ensuring the Employment of persons with disabilities⁴⁰ was held in the Committee of the Verkhovna Rada of Ukraine on Social Policy and Protection of Veterans' Rights. As confirmed by the interviewees,

'There is an active communication with all parties: with representatives of state power, with central government agencies, with the Ministry of Economy, the Ministry of Social Affairs and employment centres' Ministry for Veterans Affairs

However, some NGOs representatives commented on lack of communication with the state:

'The state should listen to the recommendations of public organisations. Recently, it turned out that the state and deputies sit and decide by themselves, they do not want to listen to public organisations. [...] the state must really understand and cooperate with public organisations.' NGO

2.3 Legislative framework

In 2010, the Ukrainian Parliament ratified the UN Convention on the Rights of persons with disabilities and its Optional Protocol, as stipulated by the law⁴¹. Following the ratification, the Ukrainian Government adopted the State Programme 'National Action Plan on the Implementation of the UN CRPD until 2020'⁴².

The following legal acts regulate social protection of persons with disabilities and their access to work and the labour market in Ukraine:

- The Labour Code of Ukraine;
- Law 'On the Basics of Social Protection of persons with disabilities in Ukraine';
- Law 'On the Status of War Veterans, Guarantees of Their Social Protection';
- Law 'On Rehabilitation of persons with disabilities in Ukraine';
- Law 'On Employment of the Population';
- Other normative legal acts.

Labour Code of Ukraine (Labour Code)⁴³ contains general provisions on employment and the rights of employees, including the employment of persons with disabilities.

Law of Ukraine 'On the Basics of Social Protection of persons with disabilities in Ukraine'⁴⁴, (No 875-XII adopted on 21 March 1991), is a basic law, ensuring the rights persons with disabilities to employment, rehabilitation, medical assistance and other social services. It stipulates the standards of workplaces intended for the employment of persons with disabilities, which must be implemented by enterprises, institutions, organisations and individuals.

This Law states that at least 4% of the average number of full-time employees for enterprises should be persons with disabilities. This applies to entities that employ at least eight people (the 'quota

⁴⁰ Verkhovna Rada of Ukraine, *Committee on Social Policy and Protection of Veterans' Rights held a roundtable on 'Interaction of State Institutions on Ensuring the Employment of Persons with Disabilities*', [online]. Last accessed 10 April 2025 at: https://www.rada.gov.ua/news/news_kom/254908.html.

⁴¹ Verkhovna Rada of Ukraine, Law No 1767-VI dated 16 December 2009 'On the Ratification of the Convention on the Rights of Persons with Disabilities and the Optional Protocol thereto', [online]. Last accessed 10 April 2025 at: <https://zakon.rada.gov.ua/laws/show/1767-17#Text>.

⁴² Cabinet of Ministers of Ukraine, Resolution No 706 dated 1 August 2012 "On Approval of the State Target Program 'National Action Plan for the Implementation of the Convention on the Rights of Persons with Disabilities' for the Period up to 2020", [online]. Last accessed 10 April 2025 at: <https://zakon.rada.gov.ua/laws/show/706-2012-n#n13>.

⁴³ Verkhovna Rada of Ukraine, *Labour Code of Ukraine*, [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/322-08#Text>.

⁴⁴ Law of Ukraine on Basics of Social Protection of Persons with Disabilities in Ukraine. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/875-12#Text>.

system'). Employers who do not meet this (excluding state-funded institutions) must pay annual sanctions to the Fund for Social Protection of persons with disabilities.

Law of Ukraine 'On the Status of War Veterans, Guarantees of Their Social Protection'⁴⁵ (No 3551-XII adopted on 22 October 1993) determines the legal status of persons who took part in hostilities and became disabled as a result of combat operations. It also establishes social protection for such persons, including employment, benefits and social guarantees.

Resolution of the Cabinet of Ministers of Ukraine (No 700 adopted on 14 August 2019), established the Unified State Register of War Veterans⁴⁶ – a unified state information and communication system designed for the collection, registration, accumulation, storage, protection and depersonalisation of information about war veterans, etc.

Law of Ukraine 'On Rehabilitation of persons with disabilities in Ukraine'⁴⁷ (No 2961-IV, adopted on 6 October 2005) ensures the rights of persons with disabilities to rehabilitation, including professional rehabilitation that contributes to their employment. Vocational rehabilitation includes measures to ensure the employment of persons with disabilities, examination of potential professional abilities, professional orientation, professional training, workplace adjustment, professional and industrial adaptation, rational employment, dynamic control over the rationality of employment and the success of professional adaptation. This Law also regulates the Individual Rehabilitation Program (IRP).

Law of Ukraine 'On Employment of the Population'⁴⁸ (No 5067-VI, adopted on 5 July 2017), establishes the rights of citizens, including persons with disabilities, to employment and outlines measures to promote the employment of such persons. Article 14 of the Law defines persons with disabilities of working age as entitled to additional guarantees to their employment support.

Law 'On Labour Protection' (No 2694-XII adopted on 14 October 1992)⁴⁹ requires enterprises to employ persons with disabilities based on the recommendations of the Individual Rehabilitation Program (IRP) and to take additional safety measures. Employers are obliged to organise trainings, retraining and employment of employees with disabilities according to the IRP.

Resolution of the Cabinet of Ministers of Ukraine 'Some Questions of the Organisation of Employment of persons with disabilities' (No 553, adopted on 2 June 2023)⁵⁰ approves the Procedure for providing the SES with information necessary for the employment of persons with disabilities. This includes information from enterprises, institutions, organisations or individual employers submitted to regional employment centres (located in cities, districts, and smaller settlements) regarding job vacancies, including also vacancies for employees with disabilities.

Order of the Ministry of Social Policy of Ukraine 'on approval of the procedure for identifying persons with disabilities who can be employed and sending information about such persons to the State Employment Centre' (No 172-H, adopted on 10 April 2024)⁵¹ describes the mechanism for identifying persons with disabilities who can be employed, and procedure for sending information about such persons to the SEC.

⁴⁵ Law of Ukraine on the Status of War Veterans Guaranteeing their Social Protection. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/3551-12#Text>.

⁴⁶ Cabinet of Ministers of Ukraine. Resolution on Unified State Register of War Veterans. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/700-2019-%D0%BF#Text> and <https://mva.gov.ua/edrvw>.

⁴⁷ Law of Ukraine. Rehabilitation of the Disabled People in Ukraine. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/2961-15/conv#n436>.

⁴⁸ Law of Ukraine on Population Employment. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/5067-17#Text>.

⁴⁹ Law on Labour Protection. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/2694-12#Text>.

⁵⁰ Law of Ukraine. Organising the Employment of Persons with Disabilities. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/553-2023-%D0%BF#Text>.

⁵¹ Ministry of Social Policy of Ukraine. Order. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/z0566-24#Text>.

In January 2025, the President of Ukraine approved the law (**Law No 4219-IX, adopted on 15 January 2025**⁵²) that introduces significant changes in the current legislation expanding the rights and opportunities for employment of persons with disabilities. It introduces amendments in the definition of 'a person with a disability', while also widening the possibilities for their employment, both in the private and public sector, and support services available for persons with disabilities and employers. The amendments came into effect starting 1 January 2026.

Another recent and significant reform is the replacement of the MSECs with Expert Teams for Functionality Assessment. The previous assessment has reported multiple barriers including perceived corruption; limited availability of assessment facilities; poor quality of assessment and the IRP⁵³. The International Classification of Functioning, Disability and Health (ICF) is being integrated into the national framework since July 2025 to ensure compliance with international standards and guidelines. This reform aims to modernise Ukraine's disability assessment framework by shifting from a rigid, bureaucratic model to a more flexible, patient-centred approach, emphasising an individual's everyday functionality rather than limitations in work capacity. The changes will have broad implications across sectors, including education, social support, and employment.

2.4 Strategic framework

In 2021, the Government of Ukraine approved the **National Action Plan for the Implementation of the UN Convention on the Rights of persons with disabilities by 2025**⁵⁴. The Plan is designed to coordinate the work of central and local executive bodies, local self-government bodies, enterprises, institutions and organisations regarding the implementation of the UN CRPD and to increase the effectiveness of actions to protect and ensure full and equal realisation of human rights and fundamental freedoms of persons with disabilities.

In 2021, Ukraine adopted the National Strategy for creating a barrier-free environment in Ukraine up to 2030⁵⁵, with the main objective to provide accessible information, infrastructure, and environment to all population groups, including persons with disabilities and people with limited mobility. This Strategy was initiated by the First Lady of Ukraine, Olena Zelenska⁵⁶, and assigns various initiatives to be implemented by responsible ministries⁵⁷. **The 2023-2024 Action Plan**⁵⁸ mentions detailed actions to be implemented on adapting the physical environment, public transport, public organisations and information. Over the course of 2023, 255 measures outlined in the action plan were implemented⁵⁹.

⁵² Verkhovna Rada of Ukraine, *Law No 4219-IX dated 15 January 2025 'On Amendments to Certain Legislative Acts of Ukraine Regarding the Ensuring of the Right of Persons with Disabilities to Work', [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/4219-IX#Text>.

⁵³ Global Disability Fund (2025). Situational analysis on the Rights of Persons with Disabilities in Ukraine: <https://globaldisabilityfund.org/new/wp-content/uploads/2025/03/SITAN-Ukraine.pdf>.

⁵⁴ Cabinet of Ministers of Ukraine. Order. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/285-2021-%D1%80#Text>.

⁵⁵ National Strategy for creating a barrier-free environment in Ukraine. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/366-2021-p#Text>.

⁵⁶ Business without Barriers. [online]. Last accessed 17 April 2025 at: <https://business.diia.gov.ua/initiative/biznes-bez-bareriv>.

⁵⁷ Ministry of Internal Affairs of Ukraine. [online]. Last accessed 17 April 2025 at: <https://mvs.gov.ua/en/right/nediskriminacia-ta-bezbarjernist/vikonannia-nacionalnoyi-strategiyi-iz-stvorennia-bezbarjernogo-prostoru-v-ukrayini-na-period-do-2030-roku>.

⁵⁸ National Action Plan. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/372-2023-p#n15>.

⁵⁹ OHCHR, Examen de l'Ukraine au CRPD : bien que le Comité soit conscient et regrette que le pays, [online]. Last accessed 1 April 2025 at: <https://www.ohchr.org/en/meeting-summaries/2024/08/examen-de-lukraine-au-crpd-bien-que-le-comite-soit-conscient-et-regrette>.

2.5 Sources of financing

The main sources of financing programmes supporting employment of persons with disabilities in Ukraine are the national budget, social funds and international donations.

2.5.1 State budget

In Ukraine, state funding of employment programmes for persons with disabilities is provided through various mechanisms:

- Budget subsidies for the implementation of employment and support programmes for persons with disabilities, which are provided through the Ministry of Social Policy of Ukraine or other central bodies, in particular, the SES. The state budget for 2025 allocates 6.7 billion Ukrainian Hryvnia (UAH) for the social protection of persons with disabilities, which is 300 million UAH more compared to 2024⁶⁰.
- Workplace adaptations compensations and benefits for employers who are hiring persons with disabilities or adapt workplaces to the needs of these employees⁶¹ and grants for veterans with disabilities and their families⁶².
- Funding of educational programmes and courses: available for persons with disabilities to improve their qualifications and competitiveness in the labour market. For registered unemployed individuals, including persons with disabilities, the state covers up to 10 months of training, with a maximum amount not exceeding 10 times the subsistence minimum as of 1 January (of the current year)⁶³.
- Promoting self-employment and creating new workplaces: microgrants 'Vlasna sprava'⁶⁴ (up to 250 000 UAH) and grants for veterans with disabilities and their family members⁶⁵ (various categories starting from smaller grants up to 250 000 UAH up to one million UAH, for projects that aim to create additional workplaces).

2.5.2 Financing through social funds

There are several funds in Ukraine that support employment of persons with disabilities:

- Fund for Social Protection of persons with disabilities: receives funding from the state budget of Ukraine and provides financial assistance to employers, persons with disabilities, and social enterprises. The Fund monitors information and reports from employers including payments, sanctions and fines, and the distribution of financial aids and loans to employers in cooperation with the SES and the Pension Fund of Ukraine⁶⁶. It is also responsible for providing persons with disabilities with free of charge assistive rehabilitative devices via responsible authorities and

⁶⁰ The Ministry of Finance of Ukraine. State Budget 2025. [online]. Last accessed 17 April 2025 at:

<https://mof.gov.ua/en/news/derzhbiudzhethet-2025-vidatki-na-sotsialnii-zakhyst-osib-z-invalidnistiu-zbilsheno-na-300-mln-grn-porivniano-z-2024-rokom-4939>.

⁶¹ 'Employment of people with disabilities'. [online]. Last accessed 17 April 2025 at: <https://www.msp.gov.ua/>;

<https://unity.gov.ua/en/2024/07/18/supporting-the-employment-of-people-with-disabilities/>.

⁶² Diia, 'Grant for Veterans and Their Families', [online]. Last accessed 17 April 2025 at:

<https://diia.gov.ua/services/grant-dlya-veteraniv-ta-chleniv-yihnih-simej>.

⁶³ Verkhovna Rada of Ukraine, 'Law No 2694-XII dated 14 October 1992 'On Labour Protection'', [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/2694-12#Text> (<https://zakon.rada.gov.ua/laws/show/2694-12#Text>).

⁶⁴ Ministry of Economy of Ukraine, 'Vlasna Sprava (Own Business): from the beginning of 2024, more than 2,000 Ukrainians became winners of the programme and will receive micro-grants worth UAH 500 million', [online]. Last accessed 17 April 2025 at: <https://me.gov.ua/News/Detail/edbc787e-f79e-4055-ad9a-54ff1d059f12?lang=en-GB&title=VlasnaSprava-ownBusiness-FromTheBeginningOf2024-MoreThan2-000-UkrainiansBecameWinnersOfTheProgrammeAndWillReceiveMicrograntsWorthUah500-Million>.

⁶⁵ Diia, 'Grant for Veterans and Their Families', [online]. Last accessed 17 April 2025 at: <https://diia.gov.ua/services/grant-dlya-veteraniv-ta-chleniv-yihnih-simej>.

⁶⁶ Established norms for employment of people with disabilities. [online]. Last accessed 17 April 2025 at:

<https://www.ispf.gov.ua/diyalnist/robotodavcyam/spriyannya-zajnyatosti-ta-stvorennnyu-rm-dlya-osib-z-invalidnistyu>.

organisations⁶⁷. Veterans may also apply for free assistive devices, equipment, prosthetics/orthotics services through this Fund.

- The Pension Fund of Ukraine: its activities are coordinated the Cabinet of Ministers of Ukraine through the Minister of Social Policy, and certain tasks pertain to exchange of information with the Fund for Social Protection regarding workplaces created for persons with disabilities, employment and job placement.

2.5.3 International technical assistance and other types of donor funding

Ukraine receives funding from other countries, international organisations and donor structures, such as the International Labour Organization (ILO), the World Bank, the European Union. The examples of programmes aimed at improving the employment conditions of persons with disabilities are:

- UNDP Project 'Supporting rehabilitation of persons with disabilities caused by war' (2022-2024) with the funding support from the Governments of Germany and the Republic of Korea⁶⁸. The project addressed the immediate and long-term needs of persons with disabilities, facilitating their socio-economic integration and enhancing their quality of life. Under this project grants (starting from USD 10 000) were provided to NGOs in four regions of Ukraine;
- Helvetas Swiss Interco-operation Project supporting business initiatives of internally displaced persons and persons with disabilities⁶⁹. The maximum amount of grants was 114 000 UAH available to NGOs in two regions of Ukraine, i.e. Kharkiv and Dnipropetrovsk in 2024.

Many local non-governmental organisations have received funding for the implementation of local projects aimed at integrating persons with disabilities into society by ensuring equal employment opportunities⁷⁰.

2.5.4 Local municipal authorities

Local municipal authorities also finance employment programmes for persons with disabilities through local budgets, especially when it comes to socially oriented enterprises or specialised institutions for persons with disabilities – providing social services (care)⁷¹.

2.5.5 Corporate social responsibility

Some large companies and corporations may self-fund employment programmes for persons with disabilities as part of their corporate social responsibility initiatives. These can be special trainings, job creation, organisation of inclusive enterprises, etc.

- One example is the national network 'Business for the Employment of Persons with Disabilities' established by the CEU with joining the ILO Global Business Disability Network. The Network provides the best practices examples of employing persons with disabilities⁷²;

⁶⁷ Compensation for assistive devices. [online]. Last accessed 17 April 2025 at:

<https://www.ispf.gov.ua/diyalnist/zabezpechennya-tehnichnimi-zasobami-reabilitaciyi/zagalna-informaciya>.

⁶⁸ UNDP Project. [online]. Last accessed 17 April 2025 at: <https://www.undp.org/ukraine/projects/supporting-rehabilitation-persons-disabilities-caused-war#:~:text=The%20Supporting%20the%20Rehabilitation%20of,persons%20with%20traumas%20and%20injuries> and <https://chaszmin.com.ua/vid-10-000-dol-konkurs-proyektiv-shho-spryyayut-pratsevlashtuvannyyu-lyudej-z-invalidnistyu-vid-proon/>.

⁶⁹ GURT Resource Center, *Grant Competition from Helvetas Swiss Intercooperation*, [online]. Last accessed 17 April 2025 at: <https://gurt.org.ua/news/grants/101688/>.

⁷⁰ Some examples: <https://ls.org.ua/en/our-achievements-and-projects/project-empower-ukraine-disability-rights/>; <https://www.undp.org/ukraine/projects/mainstreaming-policies-and-services-people-disabilities-ukraine>; <https://www.international.gc.ca/world-monde/funding-financement/cfli-fcil/2024/ukraine.aspx?lang=eng>.

⁷¹ U-LEAD with Europe, *Social Services in Communities: Launch of Three New Support Programs*, [online]. Last accessed 17 April 2025 at: <https://u-lead.org.ua/news/645/> (<https://u-lead.org.ua/news/645/>).

⁷² Confederation of Employers of Ukraine, *Video Testimonials: Inclusive Employment Practices*, [online]. Last accessed 17 April 2025 at: (<https://pwd.employers.org.ua/en/video>).

- Another example is the provision of barrier-free access to public services, for instance, at the Ukrainian Post Office department⁷³.

In conclusion, for the effective implementation of employment programmes for persons with disabilities in Ukraine, complex financing from various sources is necessary, including the state budget, grants, benefits for employers, and support from international organisations. An important step is also the development of social responsibility of business and the support of initiatives at the local level.

⁷³ AIN.ua, *Nova Poshta Opens Ukraine's First Inclusive Branch in Kyiv*, [online]. Last accessed 17 April 2025 at: <https://ain.ua/2024/08/23/nova-poshta-inclusive/>.

3. POLICIES SUPPORTING THE EMPLOYABILITY OF PERSONS WITH DISABILITIES

Government policy supporting the employability of persons with disabilities in Ukraine consists of the following important measures:

1. Employment Quotas regulated by Law of Ukraine 'On the Basics of Social Protection of persons with disabilities in Ukraine'. The new amendments to this legislation (Law No 4219-IX), will come into effect starting 1 January 2026.
2. Career guidance and support to persons with disabilities in the form of consulting services and personal assistance/support⁷⁴;
3. Professional training, rehabilitation and re-skilling as regulated by Law 'On Rehabilitation of persons with disabilities'⁷⁵ and the State Standards on Rehabilitation⁷⁶. Specialised employment centres managed and financed by SES⁷⁷ and public organisations, provide vocational guidance and reskilling courses for persons with disabilities to obtain new qualifications and increase competitiveness in the labour market. The Law on Rehabilitation also regulates the provision of assistive devices⁷⁸;

3.1 Services supporting the employability of persons with disabilities

Services supporting persons with disabilities in Ukraine are mainly provided by the SES and its registered SECs, as well as by other public organisations and institutions.

SES services for unemployed persons with disabilities:

According to available data, in 2025, 38 542 unemployed persons with disabilities were registered as receiving SEC services, i.e. 9 766 were in employment, 2 500 were in vocational training, 1 578 were receiving education vouchers, and 2 396 were receiving adaptation compensations. In 2025, the number of persons with disabilities receiving services increased by 8.7% compared to the previous year, outpacing the overall increase in service uptake among all beneficiaries (7.7%)⁷⁹.

The SES reports provide only general figures without a clear explanation whether these services were effective for jobseekers with disabilities. There is no information about the types or duration of the jobs, or how long persons with disabilities remained employed.

⁷⁴ Ministry of Social Policy of Ukraine, *Order No 1044 dated 21 September 2016 'On Approval of the State Standard for the Social Service of Employment Support and Workplace Assistance'*, [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/z1359-16#Text>.

⁷⁵ Verkhovna Rada of Ukraine, *Law No 2961-IV dated 6 October 2005 'On Rehabilitation of Persons with Disabilities in Ukraine'*, [online]. Last accessed 17 April 2025 at: (<https://zakon.rada.gov.ua/laws/show/2961-15#Text>).

⁷⁶ Cabinet of Ministers of Ukraine, *Resolution No 1686 dated 8 December 2006 'On Approval of the State Standard Rehabilitation Program for Persons with Disabilities'*, [online]. Last accessed 17 April 2025 at: (<https://zakon.rada.gov.ua/laws/show/1686-2006-n#Text>).

⁷⁷ State Employment Service of Ukraine, *Services for Citizens*, [online]. Last accessed 17 April 2025 at: <https://www.dcz.gov.ua/people>.

⁷⁸ Фонд соціального захисту осіб з інвалідністю, *Як отримати засоби реабілітації безоплатно за державною програмою – алгоритм дій*^{*}, [online]. Last accessed 17 April 2025 at: <https://www.ispf.gov.ua/gromadskosti/yak-otrimati-dzr>.

⁷⁹ State Employment Service of Ukraine, *Analytical and Statistical Information*^{*}, [online]. Last accessed 17 January 2026 at: <https://old.dcz.gov.ua/analitics/67> and State Employment Service of Ukraine, *Results*^{*}, [online]. Last accessed 17 April 2025 at: <https://www.dcz.gov.ua/result>.

SES⁸⁰ offers a range of services aimed at enhancing the employability of persons with disabilities. To access most of these services, a person must be registered as unemployed – either online⁸¹ or in person at regional employment centres:

Consultancy services:

SES provides support when choosing a profession, selecting a job, writing a resume, etc.⁸². Some regional SECs also provide assistance in overcoming social and psychological barriers to employment. In addition, career testing is available through SES Professional Orientation Platform, where individuals can take special tests to evaluate personal skills and competences to identify the best employment options⁸³.

Job search and guidance:

The information on available vacancies is provided on SES website (dsz.gov.ua/job) and DIIA Portal⁸⁴, as well as at SECs. In addition, the 'Unified Job Portal'⁸⁵ (<https://www.dcz.gov.ua/job>) was developed through collaboration between the State Employment Service, the Ministry of Economy, and leading job search websites. As of 1 January 2024, the portal has featured 200 000 job vacancies. In addition, the job search platform (www.work.ua) has also introduced special sections 'Vacancies for persons with disabilities' and 'Preference for veterans'⁸⁶.

3.2 Measures supporting the employability of persons with disabilities

Measures supporting employability of persons with disabilities are also provided mostly by SES. Those measures aim primarily to improve skills of persons with disabilities, registered in SES. However, persons with disabilities can benefit from general services and measures, addressed to all unemployed and there is a lack of specific, specialised services for persons with disabilities, except compensation for workplace adaptation for employed persons with disabilities, described chapter 4. On one hand it ensures the inclusion of persons with disabilities into mainstream actions. On the other hand, it may hamper their access to more specialised services, better adjusted to their specific needs.

In 2025, persons with disabilities accounted for 6% of all beneficiaries of active labour market measures. While their participation was slightly higher in vocational training (6.6%) and training vouchers (6.3%), they were significantly underrepresented among beneficiaries placed in employment, where they accounted for only 3%⁸⁷. This gap points to persistent barriers in the transition from activation measures to sustainable employment outcomes for persons with disabilities.

The data indicate that existing active labour market measures, particularly those focused on employment placement, may not sufficiently address the specific needs of persons with disabilities. Strengthening the effectiveness of these measures may require more tailored interventions, enhanced employer engagement, workplace accommodations, and closer integration of training with supported employment services.

⁸⁰ State Employment Service of Ukraine, *Official Website*, [online]. Last accessed 17 April 2025. Available at: <https://www.dcz.gov.ua>.

⁸¹ Diia, *Obtaining Unemployment Status*, [online]. Last accessed 17 April 2025. Available at: <https://diia.gov.ua/services/otrimannya-statusu-bezrobitnogo>.

⁸² State Employment Service of Ukraine, *Career Guidance Consultants in Poltava Region*, [online]. Last accessed 17 April 2025 at: <https://www.dcz.gov.ua/proforient/consultants?filter=UA05>.

⁸³ State Employment Service of Ukraine, *Career Guidance and Development Platform*, [online]. Last accessed 17 April 2025 at: <https://profi.dcz.gov.ua>.

⁸⁴ Diia Barrier-Free Portal, *Services for People with Disabilities*, [online]. Last accessed 17 April 2025. Available at: <https://bf.diia.gov.ua/categories/lyudu-z-invalidnistyu>.

⁸⁵ State Employment Service of Ukraine, *Unified Job Portal*, [online]. Last accessed 17 April 2025 at: <https://www.dcz.gov.ua/job>.

⁸⁶ Work.ua, *Jobs for People with Disabilities*, [online]. Last accessed 17 April 2025 at: <https://www.work.ua/jobs/disability>.

⁸⁷ State Employment Service of Ukraine, *Provision of services by the State Employment Service*, [online]. Last access: 09.02.2026 at: <https://old.dcz.gov.ua/analytics/68>.

Below is a brief overview of the key active labour market measures:

Vocational training, education and (re)qualification:

Persons with disabilities can access **vocational training and retraining** at educational institutions of various forms of ownership⁸⁸, or at the Vocational Training Centres (VTCs) of the SES⁸⁹. There are nine such centres located across different regions of the country: in Kyiv, Rivne, Dnipro, Poltava, Kharkiv, Odesa, Sumy, Ivano-Frankivsk, and Lviv. Approximately 98 licensed professions and 400 educational programmes are available⁹⁰, including online courses⁹¹. Upon completion, students receive a state-recognised certificate. An Individual Rehabilitation Programme (IRP)⁹² is taken into consideration that covers various aspects of rehabilitation needed, including education, training and necessary workplace adaptations.

Training vouchers provided by the State Employment Service enable persons with disabilities to access reskilling and upskilling opportunities through accredited education and training providers. **Persons with disabilities are among the priority groups eligible for vouchers** and may benefit from more flexible access conditions, including the possibility to apply without being registered as unemployed. The measure finances training in occupations aligned with labour market demand, supports individual career transitions and aims to strengthen employability while promoting inclusive participation in lifelong learning.

Short-term employment opportunities:

Persons with disabilities who have completed vocational training and require practical experience in their acquired profession⁹³ may participate in **internships** (up to 160 hours), **temporary jobs** that cannot exceed 180 working days⁹⁴ or engage in **community service**⁹⁵. These can be administered by SES or VTC.

As commented by an interviewee from the State Employment Centre:

'To have temporary employment, the unemployed need to be registered and can also perform community service, which can be weaving nets, gathering firewood, cleaning the territory or something else... Also, repair of ammunition for the military, the manufacture of trench candles and so on, since now the Employment Service is trying to support the country and our defenders in the first place' **State Employment Centre**

In addition, **civil society organisations and businesses** offer various types of education, training and reskilling opportunities for persons with disabilities. They may cooperate with SES in the provision of these services. These could include the following:

- Social enterprisers contribute to the employment of persons with disabilities. For instance, Ukrainian Society of the Deaf (UTOG) and Ukrainian Society of the Blind (UTOS) help with the

⁸⁸ State Employment Service of Ukraine, *Professional Training for the Unemployed*, [online]. Last accessed 17 April 2025 at: <https://www.dcz.gov.ua/profnavch/навчбезра>.

⁸⁹ State Employment Service of Ukraine, *Regional Vocational Education Centres*, [online]. Last accessed 17 April 2025 at: <https://www.dcz.gov.ua/regioncpto>.

⁹⁰ Ministry of Economy of Ukraine, *Educational Opportunities from the Ministry of Economy: List of Available Programs*, [online]. Last accessed 17 April 2025 at: <https://me.gov.ua/News/Detail/dbfde3a0-b765-4791-8808-76392daedf67?lang=en-GB&title=EducationalOpportunitiesFromTheMinistryOfEconomy-ListOfAvailablePrograms&showMenuTree=true>.

⁹¹ State Employment Service of Ukraine, *e-Osvita Online Learning Platform*, [online]. Last accessed 17 April 2025 at: <https://eosvita.dcz.gov.ua>.

⁹² Ministry of Health of Ukraine, *Recommendations on Completing the Individual Rehabilitation Program (IRP)*, [online]. Last accessed 17 April 2025 at: <https://moz.gov.ua/uk/rekomendaciyi-shodo-zapovnennya-individualnoyi-programi-reabilitaciyi-ipr> and National Social Service of Ukraine, *Individual Rehabilitation Program*, [online]. Last accessed 17 April 2025 at: <https://nssu.gov.ua/news/indyvidualna-prohrama-reabilitatsii>.

⁹³ Order of the Cabinet of Ministers of Ukraine 'On Approval of the Procedure for Vocational Training, Retraining and Advanced Training of Registered Unemployed Persons' (No 264 dated 24 March 2023). [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/264-2023-n#Text>.

⁹⁴ Regulation on the Approval of the Procedure for Organising Public and Other Temporary Works (No 175 as of March 20, 2013), Cabinets of Ministers. [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/175-2013-n#Text>.

⁹⁵ State Employment Service of Ukraine, *Public and Other Temporary Works*, [online]. Last accessed 17 April 2025 at: <https://www.dcz.gov.ua/people/gromadwork>.

employment of persons with disabilities, their labour and social rehabilitation. In particular, UTOG owns 28 educational and industrial enterprises where work people with hearing disabilities⁹⁶ and has own programmes of re-skilling;

- Businesses: Large companies such as Ukrzaliznytsia, Kyivstar and Kernel provide vocational training programmes for new hires and employ persons with disabilities⁹⁷;
- Re-skilling Programmes supported by international organisations⁹⁸: for instance, Skils4Recovery⁹⁹; ReSkillUA¹⁰⁰; Reskilling Ukraine¹⁰¹. These programmes address labour force in general, not specifically persons with disabilities, who could be included among target population.

However, current vocational training system is considered insufficient in supporting employment of persons with disabilities and stimulating employers. For example, as stated in the OECD working paper¹⁰², 'the labour market inclusion of persons with disabilities is weak given that, out of 30 000 registered persons with disabilities, only few can be assisted in terms of gaining employment'. Similarly, several interviewees highlighted the insufficiency of current employment measures, mentioning:

A 'lack of mainstream job opportunities for persons with disabilities' Ministry for Veterans Affairs;

'low work engagement of people with intellectual disabilities' NGO;

'difficulty in employing persons who need extensive care, especially for work from home, since such vacancies are rare' Employment Centre.

Some organisations provide also support for specific groups of persons with disabilities. It can be related to the type of disability or – for example – gender. For example, some NGOs organise vocational and entrepreneurship training courses for women with disabilities, which gives them the opportunity to gain skills for employment or start their own businesses. Organisations such as the National Association of People with Disabilities¹⁰³ and the All-Ukrainian Association of Women with Disabilities conduct trainings, events, and campaigns that help raise awareness of the specific problems faced by women with disabilities in the labour market.

3.3 Measures addressing the needs of war veterans

Successfully reintegrating veterans into the economy, supporting their health, education and employment, are important objectives, reflected in the National Veterans Policy Strategy for the period up to 2030¹⁰⁴. Veterans bring both hard skills (mechanics, operating machinery, telecommunications)

⁹⁶ Ukrainian Society of the Deaf (UTOG), *Program for Creating Barrier-Free Access in Institutions, Organisations, and Establishments of Ukraine for Persons with Hearing Disabilities through 'UTOG Service*', [online]. Last accessed 17 April 2025 at: <https://utog.org/projects/realizovani-proekti/program-service-utog>.

⁹⁷ Confederation of Employers of Ukraine, *Best Practices: Employment of Persons with Disabilities*, [online]. Last accessed 17 April 2025 at: <https://pwd.employers.org.ua/en/video>.

⁹⁸ Ministry of Economy of Ukraine, *Educational Opportunities from the Ministry of Economy: List of Available Programs*, [online]. Last accessed 17 April 2025 at: <https://me.gov.ua/News/Detail/dbfde3a0-b765-4791-8808-76392daedf67?lang=en-GB&title=EducationalOpportunitiesFromTheMinistryOfEconomy-ListOfAvailablePrograms&showMenuTree=true>.

⁹⁹ Delegation of the European Union to Ukraine, *Joint Action Skills4Recovery Launched: EU, Poland, Estonia Join Germany to Train 4,700 Skilled Workers for Ukraine's Economy*, [online]. Last accessed 17 April 2025 at: https://www.eeas.europa.eu/delegations/ukraine/joint-action-skills4recovery-launched-eu-poland-estonia-join-germany-train-4700-skilled-workers_en.

¹⁰⁰ Happy Monday, *ReSkill UA Project*, [online]. Last accessed 17 April 2025 at: <https://happymonday.ua/reskill>

¹⁰¹ Beredskapslyftet Ideell Förening, *Reskilling Ukraine Project*, [online]. Last accessed 17 April 2025 at: <https://reskillingukraine.professionalcenter.se>.

¹⁰² OECD (2024), *Safeguarding the Sustainability of the Ukrainian Pension System*. Available at: https://www.oecd.org/en/publications/safeguarding-the-sustainability-of-the-ukrainian-pension-system_fc202a7e-en.html (Accessed: 17 April 2025).

¹⁰³ Ukrainian Network of People with Disabilities, Official Website, [online]. Last accessed 17 April 2025 at: <https://naiu.org.ua/>.

¹⁰⁴ Ministry of Veterans Affairs of Ukraine, *Government Approves Veteran Policy Strategy for the Period up to 2030*, [online]. Last accessed 17 April 2025 at: <https://mva.gov.ua/prescenter/category/86-novini/uryad-shvaliv-strategiu-veteranskoj-politiki-na-period-2030-roku>.

and soft skills (such as resilience, teamwork, leadership, adaptability, and creativity) that can be applied to many sectors and occupations¹⁰⁵. Social and professional support for war veterans, including discharged persons and family members, is provided in accordance with the Cabinet of Ministers Regulation (No 432, adopted on 21 June 2017)¹⁰⁶. The leading role in supporting the employment and reintegration of persons with disabilities, in particular veterans, belongs to SECs, as well as The Ministry for Veterans Affairs and public organisations (NGOs).

All services, described in chapters 3.1 and 3.2 are available for war veterans. The interviewees from State Employment Centre confirmed the availability of various training support available for veterans:

'Veterans are trained precisely in our centres of vocational and technical education, of which there are currently eight in operation in Ukraine. There are up to 400 professions. All of this is available on DCZ [State Employment Centre] website. The courses are different; they can be up to 6 months. A person chooses them, applies to us and provides us with confirmation. We direct this person to an educational institution' State Employment Centre.

Promoting entrepreneurship and self-employment:

Grant programme¹⁰⁷: The Ministry of Economy of Ukraine and the State Employment Service provide veterans and/or war-disabled persons who have been registered as private entrepreneurs and their family members with non-refundable grants to start own business. Through the *eRobota* Portal (administered by DIIA)¹⁰⁸, veterans can apply for the following types of grants:

- Microgrants up to UAH 250 000 for the creation of one workplace;
- Up to UAH 500 000 for two jobs created;
- UAH 1 million, provided that four jobs are created, with at least two being set aside for veterans or war-disabled persons.

Most of the interviewees emphasised the significance of the microfinancing (grant) programmes for veterans and for the country as a whole, highlighting support provided from SES and NGOs. However, some pointed out the challenges, including lack of follow-up assistance ('he [the grant recipient] almost burned out, because he did not know how to manage this business' NGO

Other difficulties concerned premises rent, equipment purchases, and coping with 'force majeure situations such as power outage or other war-related disruptions that can significantly affect business operations' Veteran with disability

The Ministry for Veterans Affairs provides the following services to veterans, including those with a disability:

- Education and requalification through 'Veterans' Development Centres'¹⁰⁹: 26 centres are established at higher education Institutions (HEIs) that provide practical skills training, education,

¹⁰⁵ Center for Strategic and International Studies (CSIS), 'Ukraine's Future Rests on Its People', [online]. Last accessed 17 April 2025. Available at: <https://www.csis.org/analysis/ukraines-future-rests-its-people>.

¹⁰⁶ Cabinet of Ministers of Ukraine. Resolution No 432, as of June 21, 2017 [online] Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/432-2017-%D0%BF#ext>.

¹⁰⁷ Grant for veterans and their families: <https://dcz.gov.ua/people/ubd> Vlasna Sprava (Own Business) programme. *, [online]. Last accessed 17 April 2025 at: <https://me.gov.ua/News/Detail?lang=en-GB&id=f148ecf3-92c4-4f9f-bc93-bcd318143f22&title=VlasnaSprava-Uah1-BillionInMicrograntsForBusinessDevelopmentWillBeAwardedByTheStateToTheWinnersOfTheProgrammeSinceTheBeginningOfTheYear>

and Vlasna Sprava Grant Program, 'Support for Veterans', [online]. Last accessed 17 April 2025. Available at: <https://vlasnaspravagrants.com.ua/veterans/>.

¹⁰⁸ Ministry of Digital Transformation of Ukraine, 'ePoBora – Government Grant Program for Business Development', [online]. Last accessed 17 April 2025 at: <https://erobota.diia.gov.ua>.

¹⁰⁹ Ministry of Veterans Affairs of Ukraine, 'Veteran Development Centers', [online]. Last accessed 17 April 2025 at: <https://mva.gov.ua/veteranam/tsentri-veteranskogo-rozvitku>.

professional adaptation and other services to all veterans. Veterans and family members can also get a second Master's degree as support for requalification¹¹⁰.

- Assistance¹¹¹ with transition from military service to civilian life: veterans' assistants are specially trained professionals who support defenders after their return from the frontline and help them reintegrate into civilian life. They act on behalf of local authorities, hold an official profession, and receive a salary for their work. The candidates are selected through the 'eVeteran platform'¹¹² and, after testing, undergo special training. As of December 2024, over 560 veterans' assistants were introduced in local communities throughout Ukraine. Through this platform, veterans can also check their mental status and access psychological support, if needed.
- Psychological support: a list of 41 organisations where veterans get this support is available at the Ministry website¹¹³. In addition, 'case managers' are specially trained to work with veterans in public or civil society organisations¹¹⁴. They provide information about obtaining statuses, services and social guarantees, housing, rehabilitation, employment, legal and psychological support, etc.

The interviewee from the Ministry for Veterans Affairs described the current policies targeting veterans as 'massive and active'. However, he also noted a certain degree of 'competition' among the state agencies since 'everyone is trying to create something of their own [own initiatives]'.

Services and support offered by local communities, international organisations and NGOs:

- Veterans' spaces (hubs)¹¹⁵ are funded either from the Ministry for Veterans Affairs¹¹⁶ or from grant programmes¹¹⁷, and serve as the reference point or 'navigator' on many services, including legal, psychological, social and rehabilitation. Several examples can be mentioned:
 - The 'Admin Service 'Veteran' project implemented in the capital with the support of the Ministry for Veterans Affairs¹¹⁸: provides services on behalf of several entities, with one package of documents for the entire range of services, in one place, and requiring a minimal number of visits. This service is currently available in 22 locations of the capital and are functioning as one-stop-shops.
 - The NGO 'Space of Opportunities'¹¹⁹ coordinates the Coalition of Veteran Services formed in 2021¹²⁰ (currently consisting of 26 organisations) and is involved in the development of the national veteran policy in cooperation with the Ministry of Social Policy, and trains specialists in

¹¹⁰ Ministry of Veterans Affairs of Ukraine, *Education Benefits for Veterans*, [online]. Last accessed 17 April 2025 at: <https://mva.gov.ua/veteranam/pilqi-na-navchannya>.

¹¹¹ Ministry of Veterans Affairs of Ukraine, *Government Approves Resolution to Launch Veteran Support Specialists*, [online]. Last accessed 17 April 2025 at: <https://mva.gov.ua/prescenter/category/86-novini/uryad-uhvaliv-postanovu-scho-dae-start-zaprovadzhennu-fahivtsiv-iz-suprovodu-veteraniv-viyni-ta-demobilizovanih-osib>.

¹¹² Ministry of Veterans Affairs of Ukraine, *e-Veteran Portal*, [online]. Last accessed 17 April 2025 at: <https://eveteran.gov.ua>.

¹¹³ Ministry of Veterans Affairs of Ukraine, *List of Service Providers Included in the Register of Providers of Psychological Assistance Services for Veterans and Their Families*, [online]. Last accessed 17 April 2025 at: <https://mva.gov.ua/veteranam/perelik-subektiv-nadannya-poslug-vkluchenih-do-reestru-subektiv-nadannya-poslug-iz-psiologichnoi-dopomogi-dlya-veteraniv-i-chleniv-ih-simey>.

¹¹⁴ Suspilne Khmelnytskyi, *60 Case Managers Trained to Work with Veterans in Khmelnytskyi Region*, [online]. Last accessed 17 April 2025 at: <https://suspilne.media/khmelnytskyi/520383-60-kejs-menedzeriv-pidgotuvali-dla-roboti-z-veteranami-na-hmelnitsini/>.

¹¹⁵ Decentralisation Portal of Ukraine, *Veteran Policy in Communities: How It Works and What Opportunities Local Authorities Can Utilise*, [online]. Last accessed 17 April 2025 at: <https://decentralization.ua/news/19068> and Veteran Hub, *Job Search and Educational Opportunities*, [online]. Last accessed 17 April 2025 at: <https://veteranhub.com.ua/services/poshuk-roboty-ta-osvitnikh-mozhlyvostey/>.

¹¹⁶ Ministry of Veterans Affairs of Ukraine, *Veteran Spaces*, [online]. Last accessed 17 April 2025 at: <https://mva.gov.ua/category/69-veteranski-prostori>.

¹¹⁷ International Renaissance Foundation, *Thanks to You: How Does the Foundation Work to Return Veterans to Civilian Life?*, [online]. Last accessed 17 April 2025 at: <https://www.irf.ua/en/veterans-reintegration/>.

¹¹⁸ Ministry of Veterans Affairs of Ukraine, *'Veteran' AdminService Launched in Kyiv Administrative Service Centers*, [online]. Last accessed 17 April 2025 at: <https://mva.gov.ua/prescenter/category/86-novini/za-spriyannya-minveteraniv-u-stolichnih-tsnapah-zapratsuvav-adminservis-veteran>.

¹¹⁹ Prostir Moshlyvostei (Простір можливостей), *Prostir Moshlyvostei Official Website*, [online]. Last accessed 17 April 2025 at: <https://pm.in.ua>.

¹²⁰ Prostir Moshlyvostei, *Coalition of Veteran Spaces*, [online]. Last accessed 17 April 2025 at: <https://pm.in.ua/coalitions>.

the field of social work in employment centres, working with both state authorities and communities to prepare them for the return of veterans.

The active role of NGOs in contributing to successful cases of veterans with disabilities in finding work and integration into society, has been confirmed by several interviewees:

'Space of Opportunities is a very powerful organisation... their hotline is bursting with the number of phone calls about services.' **Ministry for Veterans Affairs**

'Now there are quite a lot of companies and organisations that are ready to employ demobilised persons. This information is mostly shared in veteran spaces. Because the employers know that this is the first place where demobilised persons come when they are looking for a job.' **NGO**

Despite the availability of support, one interviewee reported lack of specialists on the local level and their overload:

'The key goal is support, assistance in obtaining those services and benefits that, in general, our veterans can obtain from the state, and so on. There should be a guide at the local level who will be able to help a veteran who for one reason, or another cannot get on his own to certain government agencies and help filling out an application [...] We expect that our specialists will handle 35 cases. But we understand that every veteran has a family, a wife or a child. And so, we round up one veteran +2. That is, a wife, a child. That is, a specialist shall take care of up to 100 people. We currently provide for a fixed salary. It will be paid in a certain grade system' **Ministry for Veterans Affairs**

3.4 Enhancing the capacity of main stakeholders

Strengthening the interaction of the main stakeholders in the employment of persons with disabilities in Ukraine is an important step on the way to create an inclusive and equal environment for all citizens. This involves the expansion of cooperation between various organisations, government institutions, employers and civil society organisations.

On the local level, public organisations contribute to enhancing the capacities of main stakeholders. For instance, the Free People Employment Centre (FPEC)¹²¹ is a public organisation (NGO) supporting and assisting veterans, IDPs, women and persons with disabilities in their professional realisation. This Centre train employees and consultants of the State Employment Service in the specifics of working with veterans so that their services are focused on the needs of veterans and meet the current requirements of the labour market. The FPEC engaged **76 representatives of the SEC** who took part in trainings on the integration of military experience into civilian professions by veterans. The FPEC also held 14 seminars entitled 'Specifics of work and communication with veterans' for more than 600 representatives of social spheres, government agencies, NGOs, employment centres, volunteers working with veterans, and employers.

¹²¹ Centre for Employment of Free People (FPEC), *Projects for Governmental and Non-Governmental Organisations and Communities*, [online]. Last accessed 17 April 2025 at: https://www.czvl.com.ua/en/our_projects/for-governmental-and-non-governmental-organisations-communities/.

The interviewees likewise mentioned the importance of cooperation between the state and public organisations:

'We attend various events there and meet, make contact, conclude a cooperation agreement. Our manager meets, which we sign. So, we always discuss the purpose of our work with public organisations.' **Employment Centre**

'Are civil society institutions important? Yes, very important. Is state support important? We must understand that it is the state that should be the determining partner in this matter.' **NGO**

3.5 Best practices

Ukraine cannot boast of numerous examples of best practices in the employment of persons with disabilities or their systematic support. However, according to interviewees, in the last two years large enterprises and businesses have been more interested in creating special conditions and employing persons with disabilities, especially war veterans. Several companies were cited as positive examples, including Ukrzaliznytsia, Kernel, 'Myronivskyi bread product', Auchan, McDonalds and KFC. In addition, the 'Businesses for the Employment of People with Disabilities' Network, established by the CEU, brings together a wide range of companies that serve as cases of successful employment of persons with disabilities. Additionally, the number of social enterprises for people with intellectual disabilities is growing. Notable examples include 'Stare Misto' cafe in Lutsk, the bakery 'Good Bread from Good People'¹²², among others.

Among the best practices led by NGOs, many indeed can be referred here. The interviewees mentioned 'Space of Opportunities'¹²³, which has been active in the field for many years. The NGO provides training on working with veterans and case management and maintains constant engagement with territorial communities. Space of Opportunities has launched a Community Support Centre aimed at providing professional supervisory support to local authorities in the development and implementation of the veterans' policies in the regions, promote new tools for veterans' reintegration, and assist in their implementation. Another example is 'Legal Hundred'¹²⁴, a prominent organisation specialising in legal support and veterans' reintegration.

Among the few long-serving and effective organisations is the UTOG¹²⁵ – a public association that supports people with hearing impairments, protects their rights and interests, and promotes their social integration, development, education and employment. UTOG actively advocates for equal rights for people with hearing disabilities, including access to education, employment, medical services and other social guarantees. The organisation helps in defending the rights of deaf people in court cases, promotes their participation in elections and other aspects of public life. UTOG conducts courses, studies, seminars and trainings for deaf people, helping them to acquire new professions, improve their qualifications and integrate into the modern labour market.

A key initiative includes support of children with hearing impairments through specialised educational programmes and schools. UTOG also facilitates employment, organises special vacancies, promotes the creation of working conditions including the assistance of sign language interpreters or special communication technologies. UTOG plays an active role in the development of Ukrainian Sign Language: it conducts sign language courses, trains specialists to work with deaf people, and provides sign language interpretation for public events, courts, medical institutions, and government bodies.

¹²² United Help Ukraine (2024), *Good Bread from Good People*. Available at: <https://unitedhelpukraine.org/reports/good-bread-from-good-people/> (Accessed: 17 April 2025).

¹²³ NGO 'Простір можливостей', *Official Website*, [online]. Last accessed 17 April 2025 at: <https://pm.in.ua>.

¹²⁴ Legal Hundred NGO, *Official Website*, [online]. Last accessed 17 April 2025 at: <https://legal100.org.ua>.

¹²⁵ Ukrainian Society of the Deaf (UTOG), *Official Website*, [online]. Last accessed 17 April 2025 at: <https://utoq.org>.

4. POLICIES SUPPORTING DEMAND FOR EMPLOYMENT OF PERSONS WITH DISABILITIES

Employers are encouraged to hire individuals with disabilities through various measures, primarily financial incentives. These initiatives play a crucial role in fostering inclusive social policies and supporting the labour market. The mechanisms implemented include:

Compensations to employers for the creation of workplaces for persons with disabilities:

- Workplace adaptations: In 2024, the Government compensated employers with over UAH 100 million for the creation of 1 500 workplaces for persons with disabilities¹²⁶, with the average compensation UAH 68 000. Adaptations usually include: tactile materials for floor and stair equipment, stair crawler lift, lifting platform for wheelchair users, specialised furniture and accessories, computers with built-in eye protection devices, specialised desk lamps, communication equipment and specialised accessories for employees with hearing impairments. Overall, employers can receive up to UAH 120 000 for one adapted workplace for a person with Group I disability, and up to UAH 80 000 for an adapted workplace for a person with Group II disability (as of March 2025)¹²⁷.
- Reduced social insurance contributions: actual contributions vary depending on disability group, work schedule and salary¹²⁸. Considering the existing statistics on employment of persons with disabilities these incentives are not efficient enough.

The scope of the workplace adaptations also depended on the [former] MSEC certificate and the IRP, and required close collaboration between MSEC, the Fund for Social Protection and employers. However, the adaptation is ruled by norms and not always is fully adjusted to the specificity of work performed by person with disability.

‘Employment quota’ – employers with 8–25 staff must employ at least one person with disability. For employers with **26 or more staff**, at least **4% of positions** must be filled by people with disabilities. The **Fund for Social Protection of persons with disabilities** informs employment centres about employers who do not comply with this norm, which communicate with employers.

Employers, which do not fulfil the ‘quota’, pay **administrative and economic sanctions (AES)**¹²⁹ to the Fund for Social Protection of persons with disabilities. The calculation is sent in the form of an electronic document through the employer’s electronic offices on the web portal of the Pension Fund of Ukraine¹³⁰. The Fund¹³¹ provides data on the number of employers who filled the quota at their workplaces (as shown in the table 2 below).

¹²⁶ Ministry of Economy of Ukraine, *‘Work Without Barriers’: 1,500 Jobs for People with Disabilities*, [online]. Last accessed 17 April 2025 at: <https://me.gov.ua/News/Detail/06e59612-ac5f-4afe-ba46-95843829ab76?lang=uk-UA&title=RobotaBezBarriv-1500-RobochikhMistsDliaLiudeiZInvalidnistiu>.

¹²⁷ Ministry of Economy of Ukraine, *‘Opportunities for Veterans, Their Families, and Relatives’*, [online]. Last accessed 17 April 2025 at: <https://me.gov.ua/News/Detail/06e59612-ac5f-4afe-ba46-95843829ab76?lang=uk-UA&title=RobotaBezBarriv-1500-RobochikhMistsDliaLiudeiZInvalidnistiu>.

¹²⁸ Seminar, *‘Працівник з інвалідністю: зарплата, податки, звітність, зразки документів’*, [online]. Last accessed 17 April 2025 at: <https://7eminar.ua/news/598-pracivnik-z-invalidnistyu-zarplata-podatki-zvitnist-zrazki-dokumentiv> and Verkhovna Rada of Ukraine, Tax Code of Ukraine, [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/go/2755-17>.

¹²⁹ Verkhovna Rada of Ukraine, *‘Law No 875-XII dated 21 March 1991 ‘On the Fundamentals of Social Protection of Persons with Disabilities in Ukraine’*, [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/875-12#Text>.

¹³⁰ Pension Fund of Ukraine, *‘Resolution No 14-1 dated 10 March 2023 ‘On Approval of the Procedure for Sending the Calculation of Administrative and Economic Sanctions to Be Paid Due to Non-Compliance with the Employment Quota for Persons with Disabilities for the Previous Year’*, [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/z0456-23#Text>.

¹³¹ Fund for Social Protection of Persons with Disabilities, *‘Employment and Job Placement of Persons with Disabilities’*, [online]. Last accessed 17 April 2025 at: <https://www.ispf.gov.ua/diyalnist/publicna-informaciya/zajnyatist-ta-pracevlashtuvannya-osib-z-invalidnistyu>.

Table 2: Number of employers who filled the quota at their workplace

The year in which data was processed	Reporting year	Enterprises with 8 employees or more	Number of employers who have fulfilled quota for employing persons with disabilities:				Number of jobs that employers were required to create (for the previous year)	The number of persons with disabilities who actually worked for employers in the previous year
			In total	%	Including public (budgetary) institutions	%		
2023	2022	98 703	72 730	73.7%	10 100	13.9%	321 099	403 156
2024	2023	91 993	72 380	78.7%	10 363	14.3%	298 250	403 453
2025	2024	90 630	74 729	82.5%	10 565	14.2%	288 934	421 364

Source: Fund for Social Protection of Persons with Disabilities

However, some stakeholders highlight mixed perceptions of the disability employment quota system. NGO representatives noted that, while the quota aims to promote labour market inclusion, its implementation may encourage formal compliance rather than meaningful employment outcomes, including cases of nominal or short-term hiring used primarily to meet legal requirements. Some stakeholders questioned the effectiveness of punitive approaches and emphasised the need for more incentive-based and educational measures that support both employers and persons with disabilities. These views suggest ongoing debates on how to balance regulatory obligations with positive employer engagement and sustainable inclusion practices.

Self-employment grants¹³²: grants for creating own business are available to veterans with disabilities, their families and other categories of the population¹³³. As of 1 February 2025, a total of 1 178 veterans had received grants since the beginning of the programme. In February 2025, there were 19 winners¹³⁴.

New employment measures: As from 1 January 2026, the Law¹³⁵ (No 4219-IX) adopted on 15 January 2025, will come into effect aiming to improve employment conditions for persons with disabilities, aiming to increase their employment rate¹³⁶. This Law aligns the Ukrainian current legislation with the provisions of Article 27 ‘Labour and Employment’ of the UN CRPD¹³⁷. Key changes include expanding job opportunities by requiring state authorities and local government agencies to employ persons with disabilities alongside private businesses. It also plans to introduce state standards for workplace accommodations at enterprises and organisations of all forms of ownership. Instead of fines, the payment of a contribution to support the employment of persons with disabilities will be in place, which is lower compared to previous AES. Additionally, this Law mandates the

¹³² State Employment Service of Ukraine, ‘Grant for Veterans and Their Families’, [online]. Last accessed 17 April 2025 at: <https://www.dcz.gov.ua/people/ubd>.

¹³³ Diia, ‘Grant for Starting Your Own Business’, [online]. Last accessed 17 April 2025 at: <https://diia.gov.ua/services/grant-na-vlasnu-spravu>.

¹³⁴ Ministry of Economy of Ukraine, ‘Grants for Veterans: UAH 553 million to Support Business Development for Veterans and Their Spouses’, [online]. Last accessed 17 April 2025 at: <https://me.gov.ua/News/Detail/a624be0b-7fb4-405a-8d66-6c3b983e300d?lang=uk-UA&title=GrantiVeteranam-553-MinGmOtrimaiutVeteraniTaDrugiiZyikhnogoPodruzzhziaNaRozvitokBiznesu>.

¹³⁵ Verkhovna Rada of Ukraine, ‘Draft Law No 5344-d dated 18 November 2022 ‘On Amendments to Certain Laws of Ukraine Regarding Ensuring the Rights of Persons with Disabilities to Work’*, [online]. Last accessed 17 April 2025 at: <https://itd.rada.gov.ua/billInfo/Bills/Card/40853>.

¹³⁶ Komersant Ukrainskyi, ‘New Rules for Employment of Persons with Disabilities: What Will Change’, [online]. Last accessed 17 April 2025 at: <https://www.komersant.info/en/novi-pravyla-pratsevlashuvannia-osib-z-invalidnistiu-shcho-zminytsia/>.

¹³⁷ United Nations, ‘Convention on the Rights of Persons with Disabilities’, adopted on 13 December 2006, [online]. Last accessed 17 April 2025 at: https://zakon.rada.gov.ua/laws/show/995_q71#Text.

provision of social services to persons with disabilities, including social support at the workplace, personal assistants, sign language interpretation, etc. as part of the employment process.

5. THE LINKAGES BETWEEN EMPLOYMENT AND OTHER POLICY AREAS

5.1 From school to the labour market

In Ukraine there are not a specific programs, targeting youth with disabilities and supporting the transition of persons with disabilities from schools to the labour market. However, students with disabilities can benefit from **inclusive education**.

Children with disabilities can **access general education in mainstream schools**, where necessary accommodations are provided, considering their needs (for example, access to assistive technologies, support of a child's assistant, etc). According to the Ministry of Education and Science (MoES)¹³⁸ the number of SEN students in inclusive classes in 2023-2024 rose by 19%, reaching 40 354, and increased further to 47 160 in 2024/2025. Each student has an Individual Program of Development implemented by teams of special education professionals. Higher educational institutions provide entrance education quotas for students with disabilities based on the government order. These students are entitled to education stipends and continue to receive disability pension during their studies.

Students with disabilities can also benefit from career guidance, offered in schools. This may include consultations with psychologists, teachers and career development specialists. Many schools organise 'professional marathons' or open 'career days' when they invite representatives of different professions or invite students to visit enterprises¹³⁹.

However, in vocational education institutions there is a lack of inclusive space and proper assistance. If in a secondary education institution, children had the opportunity to receive help of a child assistant, vocational education has no such service.

Additional, children attending special schools and educational rehabilitation centres have to face limitations in access to labour market opportunities. For graduates of special institutions, there is a limited list of specialties that they can master after receiving special education. As reported by the FFR (2024)¹⁴⁰, 'particular occupations are explicitly prohibited, which undermines the person's real capacity to seek a job in the free labour market.' As also reflected in the interviewees' responses, the IRP may have set certain limitations on employment of persons with disabilities. Rather than considering an employee's actual needs, employers often provide adaptations and workload based on the IRP recommendations:

'For people with disabilities it is quite difficult to find a job, because [...] the recommendations of the individual rehabilitation programme may narrow their job search opportunities. Our system is such that MSEC enters only one diagnosis, one disease: either hearing impairment, or some other diseases, without hearing impairment. This is a little wrong, because these are related things. Therefore, there may be some incorrect conclusions here. But the firm, the enterprise itself decides whether to hire a person or not. The employers also face this situation. If a person is employed in a certain specialty or profession according to the MSEC certificate, where it is stated that they cannot perform a certain job there.' **Employment Centre**

¹³⁸ Ministry of Education and Science of Ukraine, *Statistical Data on Inclusive Education*, [online]. Last accessed 17 April 2025 at: <https://mon.gov.ua/osvita-2/inklyuzivne-navchannya/statistichni-dani>.

¹³⁹ Okhtyrka City Council, *Career Guidance Services of the Employment Centre*, [online]. Last accessed 17 April 2025 at: <https://okhtyrkamr.gov.ua/центр-зайнятості-2/профорієнтація/>.

¹⁴⁰ Fight for Right, League of the Strong, National Assembly of Persons with Disabilities in Ukraine and Ukrainian Helsinki Human Rights Union (2024), *Joint NGO Report: Situation on the Rights of Persons with Disabilities in Ukraine*. Available at: https://ffr.org.ua/wp-content/uploads/2024/09/INT_CRPD_CSS_UKR_58975_E.pdf (Accessed: 17 April 2025).

'A woman requested longer work hours, saying "I want to work 10 hours." ... But they answered: "Your IPR by MSEC recommends a 6-hour workday." Although she insisted: "This is a recommendation. I can work!", the reply was: "No, you have it written there. Sorry, we won't change it..." This is a little wrong.' **NGO**

After completing general education, people with disabilities can benefit from job-placement services, up-skilling and re-skilling programs, internships in the workplace and workplace support etc., detailed in chapters 3.1 and 3.2. The IRP guides measures like education, training, employment, and workplace adaptations. The support can be offered by SES or NGO, supporting people with disabilities¹⁴¹. For instance, UTOG maintains a list of companies that employ people with hearing impairments¹⁴².

The interviewees emphasize that, while individuals with disabilities may benefit from general programs, there remains a lack of specialised support specifically tailored to their needs, especially for persons with intellectual disabilities or people with hearing disabilities:

'There is no pre-professional training [...] or support during employment and at the workplace [...] the needs of people with intellectual disabilities are not taken into account; there are no funds and there is no administrative, employment centres that provide this.' **NGO**

Interviewees highlight the absence of targeted and specialised support measures for workplace integration of individuals with specific needs. There is insufficient provision of personal assistant services, which could facilitate more effective adaptation for persons with disabilities within employment settings. Furthermore, recruitment practices are not adequately tailored to accommodate the requirements of individuals with disabilities. In addition, there is inadequate support for social enterprises, which have the potential to foster more inclusive workplace environments.

5.2 How social benefits support the employment of persons with disabilities

Under Ukrainian legislation, persons with disabilities are entitled to a range of social benefits, including disability pensions, disability-related social assistance, and additional compensations provided by the state, such as transport, healthcare and housing privileges. Access to these benefits is primarily based on officially recognised disability status, which is determined through a formal assessment by the competent authorities. As a result, entitlement is not directly linked to employment status: persons with disabilities may combine disability pensions with paid work or register as unemployed. However, the pension amount may be recalculated over time depending on insurance contributions and changes in employment history.

The strong reliance on disability status within the social protection system may also influence employment decisions indirectly. Some persons with disabilities may fear that taking up employment could be interpreted as evidence of reduced functional limitations during periodic reassessments, potentially putting their status — and related benefits — at risk. This perceived uncertainty can discourage labour market participation even though employment is legally permitted alongside disability benefits.

¹⁴¹ President of Ukraine, *On World Down Syndrome Awareness Day, Olena Zelenska Visited Institutions that Support People Living with Down Syndrome*, [online]. Last accessed 17 April 2025 at: <https://www.president.gov.ua/en/news/u-vsesvitnij-den-poshirennya-znan-pro-sindrom-dauna-olena-ze-96789>.

¹⁴² Ukrainian Society of the Deaf (UTOG), *Employment Opportunities*, [online]. Last accessed 17 April 2025 at: <https://utog.org/pracevlashtuvannia/>.

5.3 Access to social services

Social services for persons with disabilities play an important role in their integration into active social and working life and enhance their quality of life.

The typical social services include:

- **medical care, such as** rehabilitation and palliative care, free or discounted medicines, and home healthcare for the seriously ill and disabled;
- **rehabilitation services** including physical and psychosocial rehabilitation, as well as vocational training, learning new skills, adaptations and provision of rehabilitation aids (prostheses, hearing aids, wheelchairs etc). Rehabilitation services are provided at rehabilitation centres administered by the Ministry of Social Policy. Access to rehabilitation, assistive devices and vocational training is available online through 'Electronic cabinet' platform¹⁴³;
- **social assistance and care:** workers/caregivers provide home care, food procurement etc., and consultative support with social benefits (pensions, care allowance, compensation for the costs of specialised means of transportation, etc.). Other social benefits may refer to access to recreation services in sanatoriums and rehabilitation centres. Social services are provided free of charge by various agencies or their representatives¹⁴⁴;
- **educational services** ensure access to inclusive education for all ages, supported by assistants, sign language interpreters, special training programmes;
- **employment and professional career support** provided by public and private entities that help with job placement, special work conditions, retraining and reskilling;
- **mental health services** such as psychological support for persons with disabilities and their families and their social integration through clubs and volunteer programmes.

The research conducted by the public organisation 'The League of the Strong' (LIGA SYLNYKH)¹⁴⁵, showed that despite the existing legal framework and the development of social services, the system of support to persons with disabilities in Ukraine faces certain challenges. These include insufficient funding for social programmes; poor accessibility and lack of universal design in municipal infrastructure; a shortage of specialised educational institutions and workplaces, and difficulties in ensuring equal access to medical services and rehabilitation, particularly in remote areas of the country. Additionally, prejudice from other citizens, fear and stigma, remain significant barriers.

5.4 Accessibility

The National Strategy on developing barrier-free space in Ukraine for the period until 2030¹⁴⁶ promotes 'barrier-free' as a foundational principle across all state policies, integrating it into national and local long-term decisions and programmes. The Barrier-free Handbook¹⁴⁷ is intended to reduce the stigmatisation of persons with disabilities and provide current information regarding accessibility in Ukraine; however, its level of dissemination among key stakeholders remains unclear.

¹⁴³ Ministry of Social Policy of Ukraine, *Electronic Cabinet for Persons with Disabilities*, [online]. Last accessed 17 April 2025 at: <https://ek-cbi.msp.gov.ua>.

¹⁴⁴ Ministry of Social Policy of Ukraine, *Services and Benefits for Persons with Disabilities: What, How, and Where to Obtain Them?*, [online]. Last accessed 17 April 2025 at: <https://www.msp.gov.ua/>.

¹⁴⁵ Kharkiv Institute for Social Research, *Attitudes towards People with Disabilities and Supported Living: Research Findings* (2024), [online]. Last accessed 17 April 2025 at: <https://khisr.kharkov.ua/stavlennia-do-liudey-z-invalidnistiu-ta-pidtrymanoho-prozhyvannia-rezultaty-doslidzhennia/>.

¹⁴⁶ Cabinet of Ministers of Ukraine, *Resolution No 366-r dated 14 April 2021 'On Approval of the National Strategy for Creating a Barrier-Free Space in Ukraine for the Period up to 2030'*, [online]. Last accessed 17 April 2025 at: <https://zakon.rada.gov.ua/laws/show/366-2021-p#Text>.

¹⁴⁷ Barrier-Free Handbook, *Without Barriers*, [online]. Last accessed 17 April 2025 at: <https://bf.in.ua/en/>.

Multiple ministries, such as the National Social Service of Ukraine¹⁴⁸ or the Ministry for Development of Communities and Territories of Ukraine¹⁴⁹ have reported on progress pertaining to their assigned initiatives. Although some progress has been achieved, significant challenges persist. It should be also underlined that the strategy addresses the diverse needs of multiple groups, including elderly, women, and people with reduced mobility, with persons with disabilities representing one of these key cohorts.

5.4.1 Architectural barriers

Many workplaces and offices are not adequately equipped to accommodate the needs of persons with disabilities. The lack of ramps, elevators, accessible toilets, and other necessary infrastructural solutions creates significant barriers to accessing workplaces. This challenge was reflected in the interviewees' responses. One interviewee highlighted that, although the space for war veterans within their organisation is accessible, the surrounding area remains inaccessible. Another shared the example of a person using a wheelchair who is unable to leave his apartment due to environmental barriers. Interviewees also mentioned inaccessible subway stations. These examples clearly demonstrate that accessibility is not only an issue at the level of individual buildings but must be addressed comprehensively across the wider infrastructure.

5.4.2 Stereotypes and prejudices

There are still many stereotypes regarding persons with disabilities, influencing employers' decisions. Some of them believe that such employees are less productive or may require too much attention and support. Those negative prejudices are reflected in their behaviours. In the study, conducted by the IOM in 2023¹⁵⁰, 58% of war veterans with disabilities encountered obstacles in employment after military service¹⁵¹.

People with mental disorders face the most obstacles. Employers are often not interested in employing such persons, leading to discrimination and unequal treatment. This is confirmed by the Human Rights Commissioner report¹⁵², which states that employers are keen to employ persons with physical impairments in need of minimal reasonable adjustment at the workplace, rather than persons with intellectual and psychosocial disabilities. Discriminative attitudes were also reported by the interviewees:

'There are problems inherent to persons with disabilities, such as overcoming stigma. [...] And it's not just about barrier-free. This is generally about the realisation of the rights on a par with others. Participation in political life. Creating a family. Engaging in leisure, recreation, pursuing education [...]. How are persons with disabilities treated? They are either pitied or sympathised with: 'Go ahead, you don't need to queue. Come on, you won't pay,' and so on. There is no equality. It is not only about employment. It is more about attitude. [...] And this is one of the obstacles. NGO

Also, persons with disabilities are often perceived as able to conduct only very simple, low-skilled jobs, regardless of their actual abilities or skills. This creates additional dimension of the discrimination on the

¹⁴⁸ National Social Service of Ukraine, "Barrier-Free Environment", [online]. Last accessed 17 April 2025 at: <https://nssu.gov.ua/bezbariernist>.

¹⁴⁹ Ministry for Communities, Territories and Infrastructure Development of Ukraine, "National Strategy for Creating a Barrier-Free Space in Ukraine", [online]. Last accessed 17 April 2025 at: <https://mindev.gov.ua/diialnist/bezbariernyi-prostir/natsionalna-stratehiia-zi-stvorennia-bezbariernoho-prostoru-v-ukraini>.

¹⁵⁰ International Organization for Migration (IOM) Ukraine, "The Social Reintegration of Veterans in Ukraine", [online]. Last accessed 17 April 2025 at: https://ukraine.iom.int/sites/g/files/tmzbd11861/files/documents/2024-01/veterans-social-reintegration_eng.pdf.

¹⁵¹ Ukrainian Veteran Fund, "Lack of Employment Opportunities for Veterans with Disabilities: Risks for the State and Society", [online]. Last accessed 17 April 2025 at: <http://surl.li/pvreii>.

¹⁵² United Nations Human Rights Monitoring Mission in Ukraine, "Briefing Note: The Human Rights Situation of Persons with Intellectual and Psychosocial Disabilities in Ukraine", [online]. Last accessed 17 April 2025 at: <https://ukraine.un.org/sites/default/files/2022-04/Briefing%20note%20-%20HUMAN%20RIGHTS%20SITUATION%20OF%20PERSONS%20WITH%20INTELLECTUAL%20AND%20PSYCHOSOCIAL%20DISABILITIES%20IN%20UKRAINE.pdf>.

labour market. Persons with disabilities can be offered rather simple, low-skilled and low-paid jobs and it's much more difficult for them to get more attractive job offers.

5.4.3 Lack of adapted workplaces

There is a mechanism of public support for the job places adaptation. Since the beginning of 2024, more than 1 000 entrepreneurs have benefited from this support by receiving compensation for the arrangement of workplaces for about 1 200 persons with disabilities¹⁵³. Despite positive feedback from the interviewees representing public authorities, some interviewees representing NGOs reported problems with workplace adaptations: insufficient resources, preferences for simple, technical adjustment and avoidance of more complicated improvements¹⁵⁴. Interviewees also highlighted bureaucratic delays in obtaining assistive devices that prevent persons with disability from employment or implementing job-related duties.

Additionally, support remains largely status-based, as eligibility depends on obtaining official disability status. However, the criteria for acquiring this status have recently been tightened, which means that persons with mild disabilities are often unable to access the support they need. For example, as noted one of the interviewee:

'Previously, a disability status was provided to persons with any level of audiogram. Like the third, fourth, fifth level, for example, and total hearing loss. And now changes were introduced to the legislation. Hearing disability can be obtained with the fifth level of hearing loss. That is, practically, complete deafness A person with a disability

Moreover, many employers perceive workplace accessibility measures as generating additional costs. When combined with assumptions about lower productivity of persons with disabilities, these perceptions reduce incentives to invest in inclusive work environments. Administrative uncertainty further discourages engagement, as employers may lack clarity on how compliance will be monitored or audited by tax authorities, social security institutions, and other public bodies. At the same time, the low level of implementation of existing regulations and insufficient monitoring of compliance weaken the effectiveness of the current policy framework and contribute to inconsistent employer practices.

5.4.4 Differences between men and women with disabilities in the labour market

As reported by the UN, women and girls with disabilities in Ukraine face many barriers and challenges, such as access to health care services, discrimination in accessing reproductive health services, gender-based violence, inaccessible infrastructure, and low levels of economic and social participation¹⁵⁵.

Women and girls with disabilities in Ukraine experience certain difficulties in their access to the labour market and while at work, as they face double discrimination, where gender discrimination is combined with discrimination on the basis of disability. As reported on the Confederation of Employers of Ukraine (CEU) Platform¹⁵⁶, women with disabilities have lower wages compared to men. In some cases, workplaces do not provide the necessary conditions for women with disabilities (e.g. adaptation of the workplace, special technical equipment), which is also a form of discrimination. Also, the stereotypical gender segregation of professions may hamper women access to highly paid professions. Furthermore, personal security is the lowest in women with disabilities, compared both to

¹⁵³ Ministry of Economy of Ukraine, 'Barrier-Free Workplaces: The State Compensated UAH 77 Million to Employers for Equipping Workplaces for Persons with Disabilities*', [online]. Last accessed 17 April 2025 at: <https://me.gov.ua/News/Detail?Lang=uk-UA&id=6281d103-cc77-4ac4-8152-1cdddee4e4d3&title=robotabezbarriv-77-Mlngrnkompensuvaladerzhavarobotodavtsiamzaoblashtuvanniarobochikhmistsdliiudeizinvalidnistiu>.

¹⁵⁴ Lavreniuk, S. and Odusanvo, V. (2024), 'Obstacles in the employment of people with disabilities: the perspective of employees and employers in Ukraine', *Baltic Journal of Legal and Social Sciences*, No. 4, pp. 204–221. Available at: <https://doi.org/10.30525/2592-8813-2024-4-20> (Accessed: 17 April 2025).

¹⁵⁵ United Nations in Ukraine, 'Human Rights of Women and Girls with Disabilities*', [online]. Last accessed 17 April 2025 at: <https://ukraine.un.org/uk/90465-права-людини-жінок-та-дівчат-з-інвалідністю>.

¹⁵⁶ Confederation of Employers of Ukraine, 'Employment of Persons with Disabilities – RAZOM: Analytics*', [online]. Last accessed 17 April 2025 at: <https://pwd.employers.org.ua/ua/analytics>.

men with disabilities and women without disabilities¹⁵⁷. Moreover **family responsibilities and need to care of children**, may also prevent women with disabilities in access to employment and hamper their job position¹⁵⁸.

Challenges faced by women veterans in Ukraine and IDPs

Since the start of the invasion, the status of women with disabilities has been especially vulnerable, as they face increased barriers to services, social support and employment opportunities. This especially concerns displaced women with disabilities and women veterans with disabilities:

Reports¹⁵⁹ confirm the ongoing war strain on women, many of whom are caring for children, the elderly, and other family members with disabilities or reduced mobility. Women face high safety risks and a greater threat of gender-based violence¹⁶⁰. As of March 2025, of the 4.6 million internally displaced persons (IDPs) from the war in Ukraine, 59.7% were women¹⁶¹. Of the total number of war veterans reported by the Ministry for Veteran Affairs, 33.6% were women.

Women veterans face unique challenges in reconciling their military experience with societal expectations, cultural norms and family responsibilities. This often results in a stronger sense of isolation, misunderstanding or increased discrimination. Upon returning to civilian life, women veterans may encounter difficulties in accessing support networks¹⁶².

¹⁵⁷ United Nations Development Programme (2024) in Ukraine (n.d.), *A Resilient Picture: Experiences of Persons with Disabilities in Ukraine*. Available at: <https://www.undp.org/ukraine/publications/resilient-picture-experiences-persons-disabilities-ukraine> (Accessed: 17 April 2025).

¹⁵⁸ Council of Europe (2020), *Manual for Gender Equality at the Local Level*. Available at: <https://rm.coe.int/pub-alter-gender-local-policy/16809f2b02> (Accessed: 17 April 2025) and United Nations (2024), *Combined Second and Third Periodic Reports Submitted by Ukraine under Article 35 of the Convention*. Available at: <https://documents.un.org/doc/undoc/gen/g24/067/15/pdf/g2406715.pdf> (Accessed: 17 April 2025).

¹⁵⁹ Observer Research Foundation, **War's Gendered Costs: The Story of Ukraine's Women**, [online]. Last accessed 17 April 2025 at: <https://www.orfonline.org/research/wars-gendered-costs>.

¹⁶⁰ International Institute for Sustainable Development (IISD), **Including Women in Sustainable Reconstruction in Ukraine**, [online]. Last accessed 17 April 2025 at: <https://www.iisd.org/articles/insight/including-women-sustainable-reconstruction-ukraine>.

¹⁶¹ Information and Computing Centre of Ukraine, **Dashboard for Internally Displaced Persons (IDPs)**, [online]. Last accessed 17 April 2025 at: <https://www.ioc.gov.ua/en/analytics/dashboard-vpo>.

¹⁶² International Organization for Migration (IOM) Ukraine, **The Social Reintegration of Veterans in Ukraine**, [online]. Last accessed 17 April 2025 at: https://ukraine.iom.int/sites/g/files/tmzbd11861/files/documents/2024-01/veterans-social_reintegration_ukr.pdf.

6. CONCLUSIONS AND RECOMMENDATIONS

6.1 Conclusions

The analysis of ALMPs in Ukraine has revealed certain positive changes in employment of persons with disabilities in Ukraine.

Firstly, the country has developed a comprehensive legal framework to promote the inclusion of persons with disabilities in employment and social life. The Ministries and Employment Services (SES) actively participate in these efforts, providing various services both to persons with disabilities and disabled veterans. The government priority is to improve their health, while facilitating their reintegration in the labour market. This includes providing an opportunity for financial independence through secure employment or own businesses (entrepreneurship). One of the most notable policy shifts is the adoption of the new Law No 4219-IX that plans to introduce significant changes in the quota system and other areas, also aligning it with the UN CRPD requirements. However, OPDs considered this law violating the rights of persons with disabilities and creating many other barriers both to employers and employees with disabilities¹⁶³.

Secondly, an active system of rehabilitation measures, including access to vocational training and education, has been developed by SES in cooperation with SECs, HEIs and other organisations. In total, the government has created the ample mechanism for informing unemployed persons with disabilities about vacant jobs (positions), opportunities and conditions of employment in the territory of Ukraine, professional orientation, professional training and other services guaranteed by legislation; as well as providing employers who have a demand (vacancies) with information about persons with disabilities who can be employed, and support to workplace adaptations. However, to avail of its services, a PwD needs to be registered as unemployed by the SES. Moreover, persons with disabilities can access general employment services; however, there is a lack of specialised services specifically designed to address their needs. While reliance on mainstream services supports the inclusion of persons with disabilities in general labour market activities, it may also limit their chances of securing productive employment when more specialised, individualised support is required, tailored to specific types of disability.

Thirdly, a system of supportive employment measures, including the provision of individual assistants' services, assistive devices and various kind of support, has been developed by SES. The newly adopted Law No 4219-IX is expected to bring some improvements in this area. Another change in disability assessment mechanism according to Law No 4170-IX, will supposedly ensure objective and unified approach to more accurate evaluation of a person's needs. The change will also affect the social protection and support system, when the state will ensure provision of social services and assistance in employment, professional orientation and retraining based on individual needs of persons with disabilities. However, it remains unclear whether people with intellectual disabilities are provided with sufficient assistance while looking for job and being employed, often due to lack of proper statistics on their employment and provided supportive services.

In addition to state initiatives, Ukrainian non-governmental organisations play a crucial role in contributing to employment opportunities for persons with disabilities, especially where veterans are concerned. In many cases, NGOs are the first to propose, pilot and introduce important services for persons with disabilities. Many veteran-related organisations offer a wide range of services to support veterans' reintegration into the workforce and society at large.

Nevertheless, there is a significant disparity between the adopted legislation and the actual implementation of employment programmes for persons with disabilities, with little to no systematic enforcement of the laws. This especially concerns the quota system that has been in place since

¹⁶³ National Assembly of People with Disabilities of Ukraine: Appeal to the Verkhovna Rada (3 September 2024): <https://naiu.org.ua/en/archives/news/zaklyk-do-narodnyh-deputativ-nedopushhennya-prynyattya-zakonoprojekta-5344-d>.

1991. Employers frequently opt to pay fines for not upholding quotas instead of employing persons with disabilities or register employees with disabilities without their factual presence at work, a concern also confirmed by the interviewees. Furthermore, as also noted by the interviewees, employers often do not have a wide range of vacancies that can accommodate the needs of employees with disabilities, including options for remote work. In many cases, the IRP restricts the actual job functions that employees with disabilities can perform. A newly adopted Law No 4219-IX aims to reform the quota system. However, its impact on the actual employment of persons with disabilities remains unclear, as the law comes into effect only in January 2026.

Furthermore, policies must better address the needs of the younger population, especially among the veterans with disabilities whose number is constantly increasing. It is hoped that the new assessment system will also lead to changes in IRPs expanding employment opportunities for many persons with disabilities.

Despite the adoption of the Barrier-Free Strategy, and extensive efforts of the stakeholders in creating a barrier free environment, challenges persist. Particularly the lack of accessible infrastructure and transportation, which hinders access to services, buildings, and workplace, especially in smaller towns. Notably, accessibility of public information was not mentioned, despite the numerous public electronic platforms targeting access of persons with disabilities to public services and information, including those by the SES.

The major constraints remain – the ongoing full-scale war, the occupation of territories, destruction of a significant part of the economy, the relocation of the population and enterprises – that significantly weaken the employment prospects for persons with disabilities. Many people are concerned about safety issues which also affect their access to training and education facilities, as well as employment sites.

In conclusion, while Ukraine has made significant progress in aligning its legislative framework with international standards, such as the UN CRPD and the ICF, and in improving employment of persons with disabilities, particularly veterans, further efforts are needed to ensure effective implementation. Specifically, a thorough reassessment of the practical outcomes of employment quota is needed, especially in the light of recent legislative changes. Greater transparency is also desirable in monitoring the transition of persons with disabilities from education to vocational rehabilitation and to employment, supported by collecting comprehensive statistical data. Additionally, support measures, especially regarding the role and accessibility of personal assistants, should be clearly communicated by SES alongside existing services. Aligning support policies, including personal assistance services, across various areas of life, particularly within the sphere of employment, with the new disability assessment system can significantly enhance the responsiveness of support provided to persons with disabilities and promote their inclusion into open labour market. Moreover, policies should place particular attention towards the needs of young persons with disabilities, including the growing number of war veterans. Finally, persistent societal and employer biases towards persons with disabilities require targeted awareness-raising campaigns fostering a culture of inclusion.

6.2 Recommendations

Based on the strength and weaknesses identified in the analysis of the ALMPs in Ukraine, the following recommendations are proposed:

1. Monitoring and evaluation of the implementation of policies, especially employment quotas:
 - a. Strengthening monitoring and conduct the impact assessment of the employment quota programme, including the assessment of current outcomes, challenges, and provision of accurate statistical information by employers and SES;
 - b. Employment services should actively disseminate information to public, ensuring that both employers and persons with disabilities are well-informed about upcoming changes;

Taking into account recent changes, it might be beneficial to provide training for government officials and service providers on the new procedures. Additionally, organising joint forums involving employers, SES and relevant specialists would help share updates, clarify the practices and promote cooperation.

2. Enhancing accessibility of vocational training and courses for persons with disabilities

- a. Develop and implement effective vocational training programmes for persons with disabilities addressing specific economic sectors and regional labour market needs. These programmes should offer clear incentives for employers and establish well-defined pathways for job seekers with disabilities; specialised services for persons with disabilities should be also developed, ensuring appropriate approach to specific needs;
- b. Ensure that training support is focused on individual needs, interests and capabilities, especially in light of the recent changes in disability [re]assessment and the IRPs;
- c. Promote the monitoring of successful cases to refine future programmes and improve skill match to local job opportunities. Systematic studying of the needs and opinions of persons with disabilities in this respect would be beneficial.

3. Actively engaging employers:

- a. Adopt a more personalised approach to employer engagement instead of strictly formalised procedures and financial incentives. This could involve fostering direct communication, facilitating job placement, internships, and other forms of employer participation;
- b. Increase employers' awareness on the benefits of employing persons with disabilities and available measures and support. Build on existing employment support systems and best practices on positive actions and accommodations across the European Union, particularly in countries with the existing quota systems¹⁶⁴; In particular, guidance and counselling services for employers on the employment of persons with disabilities should be strengthened, as relying only on financial incentives is not sufficient.
- c. Strengthen collaboration with employers' organisations and ODPs at both central and local levels to ensure that businesses and persons with disabilities receive necessary support, information and guidance.
- d. Provide targeted support to social enterprises and expand opportunities for the meaningful employment of persons with intellectual disabilities.

4. Strengthening cooperation between government agencies, NGOs and organisations of persons with disabilities

- a. Promote sharing best practices, coordinating resources and ensuring that policies align with the actual needs of persons with disabilities; for instance, conducting comprehensive surveys to understand the needs and challenges faced by persons with disabilities, including veterans, could be beneficial;
- b. Pay special attention to promoting employment opportunities for persons with intellectual disabilities and women with disabilities;
- c. Develop sustainable mechanisms for attracting funding, tax benefits and state supported financial assistance for employers, social enterprises, OPDs and NGOs. It is also important to ensure that persons with disabilities and ODPs actively participate in policy development.

5. Improving accessibility of built environment and at the workplace

- a. Improve accessibility for persons with disabilities, namely regarding better access to transport, facilities, buildings, and public spaces;

¹⁶⁴ Practices and policies examples: <https://op.europa.eu/en/publication-detail/-/publication/858cc3f5-98a3-11ee-b164-01aa75ed71a1/language-en> and https://employment-social-affairs.ec.europa.eu/reasonable-accommodation-work-guidelines-and-good-practices_en.

- b. Actively monitor the implementation of the Barrier-Free National Strategy and adherence of employers to accessibility standards, especially in regard of persons with disabilities at the local level;
 - c. Encourage employers to provide necessary workplace adaptations, including flexible working arrangements and remote work options where possible;
 - d. Ensure the timely provision of assistive devices, particularly when such devices are essential for employment or pursuing training/education.
6. Grant programmes
- a. Ensure comprehensive assistance services to maximise grant programmes' effectiveness and sustainability. This could include trainings for grant recipients in financial management, business development, and planning;
 - b. Establish informal support networks to encourage peer-to-peer learning, mentorship, and collaboration, enabling veterans and grants recipients with disabilities to share experiences and best practices;
 - c. Provide [peer-to-peer] consulting services, offering expert guidance on business strategies and market opportunities.
7. Improving access of women with disabilities to employment
- a. Introducing various measures, such as the provision of affordable day-care facilities and caregiving support, would be beneficial to enable women, especially mothers, to actively participate in the workforce.
 - b. Additionally, strengthen access to grants, vocational training, education and employment programmes, as larger percentage of women with disabilities remain registered as unemployed.

Data limitations

This report is primarily based on document and policy analysis, supplemented by insights from several interviewees, conducted with the representatives from the ministries, the State Employment Services, ODPs and NGOs, and individuals with disabilities, including veterans. Follow-up research (investigation) involving a broader sample of employers and persons with disabilities, including youth and women with disabilities, would be beneficial to strengthen and validate the findings.

ANNEX

List of interviewees and organisations

N	Date and time	Title and address of organisation	Form (online or face-to-face)
1	Aug 15, 2024	Ministry of Veterans Affairs of Ukraine	Online
2	Jul 27, 2024	NGO National Assembly of People with Disabilities	Online
3	Aug 05, 2024	Person with disabilities (Kharkiv Association of Blind Lawyers)	Online
4	Aug 02, 2024	Kyiv State Employment Centre	Online
5	Jul 26, 2024	UTOG	Online
6	Aug 04, 2024	Veteran NGO space of Opportunities	Online
7	Aug 02, 2024	Veteran Space REHAB	Online
8	Aug 08, 2024	Veteran with disability	Online

ACRONYMS

AES	administrative and economic sanctions
ALMM	active labour market measures
ALMP	active labour market policy
CEU	Confederation of Employers of Ukraine
DPO	Disability Persons Organisation
EAA	European Accessibility Act
EC	European Commission
ETF	European Training Foundation
EU	European Union
FFR	Fight For Right
GAP III	Gender Action Plan 2021-2025
HEI	Organisation for Economic Cooperation and Development
ICF	international classification of functioning, disability and health
IDP	internally displaced persons
ILO	International Labour Organization
IOM	International Organisation of Migration
IRP	individual rehabilitation programme
IT	information technology
LIGA	The League of the Strong
MHPSS	Mental Health and Psycho Social Support
MoES	Ministry of Education and Science

MSEC	Medical and Social Expert Commission
MSs	Member States
NGO	non-governmental organisation
OECD	Organisation for Economic Cooperation and Development
OPD	Organisation for persons with disabilities
PCs	partner countries
PES	public employment services
SEC	State Employment Centre
SEN	pecial educational needs
SES	State Employment Services
UAH	Ukrainian Hryvnia
UKRSTAT	State Statistics Service of Ukraine
UN CRPD	United Nations Convention on the Rights of persons with disabilities
UNDP	United Nations Development Programme
UTOG	Ukrainian Society for the Deaf
UTOS	Ukrainian Society for the Blind
VTC	vocational training centre
WHO	World Health Organization

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