

Legislative Update

Update on Displacement-related Legislation | February 2025



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Adopted Legislation

Amendments to the pension framework

On 11 February 2025, the Government adopted [Resolution #299](#), which introduces long-awaited amendments to the administration of pensions and several social payments for specific groups of recipients. By addressing legal gaps and removing structural barriers, the Resolution eases access to pensions for three main groups: (i) IDPs, (ii) residents of temporarily occupied territories (TOTs), and (iii) certain pensioners living abroad.

Former TOT residents (IDPs and those who retained their TOT registration after relocating elsewhere in Ukraine):

For more than a decade, pensioners whose place of residence was registered in TOTs could receive their pensions only after obtaining an IDP certificate. This created barriers for IDPs and for Ukrainians who left the ToTs before 2014 but never formally updated their residence registration. The certificate, intended as a document solely confirming the fact of displacement, in practice became a prerequisite for pension payments for pensioners in the ToTs. Moreover, all pensioners with IDP certificates issued before February 2022 were obliged to receive pension payments exclusively through the state-owned bank (Oshchadbank).

Under the updated regulation:

- An IDP certificate is no longer required for accessing pensions - pensioners whose registered place of residence is (or once was) in a TOT may apply directly to the Pension Fund without first obtaining documents confirming the fact of their displacement;
- IDPs can now choose to receive their pension through any authorised bank, ending the monopoly of Oshchadbank and aligning the rights of those displaced before February 2022 with those who fled after the start of the full-scale invasion.

Residents of the Temporarily Occupied Territories:

The previous framework obliged pensioners residing in TOTs to (i) hold an IDP certificate and (ii) physically arrive at a bank or a Pension Fund office every six months to prove they were alive and therefore entitled to continued payments. It also distorted IDP registration figures, as many pensioners would travel to government-controlled areas solely to obtain the certificate and access their pensions, only to return to the occupied territories afterwards. Travelling became nearly impossible after the full-scale invasion, as many found such journeys unsafe or unfeasible. In response to these challenges, and following intense advocacy, interim solutions were prompted starting from 2023, when remote identification was introduced via the Diia portal, Diia.Signature, or video call with a Pension Fund employee.

Resolution #299 consolidates and refines those measures in the following way:

- Identification is now annual rather than semi-annual and must be completed by 31 December.
- Pensioners are also required to make at least two debit transactions on their pension account during a year, demonstrating that the account remains active.
- Applicants for a pension must sign a statement confirming that they are not receiving a pension from the Russian Federation. No documentary proof is required, although the Pension Fund can later provide technical guidance on the procedure.

Pensioners residing abroad:

Pensioners residing abroad¹ were defined as those who reside for more than 183 days per year outside Ukraine and are under temporary protection. It does not include Ukrainians who receive pensions from other countries under international bilateral agreements.

This group must complete the same annual identification by 31 December and, if they have relocated from the TOT, submit a declaration confirming that they do not receive any benefits from the Russian Federation.

- Failure to complete the required annual identification will result in the suspension of pension payments for all pensioners, regardless of their current location.
- For residents of the TOTs, failure to make at least two debit transactions on their pension account during the year may trigger a suspension of payments – a requirement explicitly set out for this group. At the same time, under existing regulations, the Pension Fund is notified by banks if no account activity is recorded, which may lead to suspension of payments for other categories of pensioners as well.
- Pensioners who retain a TOT-registered address must additionally submit a declaration confirming they do not receive benefits from the Russian Federation; failure to do so will also lead to suspension.

The suspension is reversible: payments will resume once the pensioner satisfies the outstanding formalities and submits an application to the Pension Fund.

Governments Action Plan 2025

On 18 February, the Government adopted [Regulation #131-p](#), introducing the Government's Action Plan for 2025. The document organizes strategic priorities of the Government into twelve thematic pillars: European Integration, the Ukrainian Shield (a military and security-focused initiative), Recovery of the Destroyed, a New Veteran Policy, Education, Social Transition, Economic Stability, the Rule of Law and Sanctions Policy, an Effective Digital State, Regional Development and Decentralisation, Science and Innovation, Healthcare System, and the Consolidation of Ukrainian Society. For each pillar the Plan identifies key actions, responsible institutions, implementation timelines, indicators, and expected outcomes.

The **Recovery of the Destroyed** targets the physical rebuilding of war-affected communities and broader infrastructure challenges. Abroad, Ukraine will showcase its priorities at the Ukraine Recovery Conference in Rome on 10–11 July 2025 and, with the World Bank, the European Commission and the UN, published the [fourth Rapid Damage and Needs Assessment \(RDNA-4\)](#), giving donors a full calculation of recovery works needed. Domestically, while responsibilities vary depending on each activity, the Ministry of Development will play a significant role in this pillar. Among other steps, it is tasked with drafting amendments to the Law on the Social Housing Fund and related legislation on housing-stock management and managing state subsidies and grants programmes for the recovery of war-affected communities. By the end of the year, the Ministry must also launch a pilot community recovery project as a test case for nationwide implementation, while scaling up affordable housing through soft “eOselia” loans – a

¹ This does not apply to individuals receiving pensions pursuant to international agreements—typically bilateral or regional treaties—that govern social security coordination, including the aggregation of insurance periods and the exportability of benefits for nationals of the signatory states.

program that has already been operating successfully for families whose homes were destroyed, helping to ease pressure on rental markets.

The Ministry of Development will also undertake a set of tasks under the **Regional Development & Decentralisation** area. By September, the Ministry must table two bills: one redistributes functions among local self-government and the central executive in line with the principle of subsidiarity, reflecting the overall decentralisation policy, and the other sets special procedures for restoring public authority in de-occupied or militarily administered areas. Also, the expected work includes assessment on granting territorial communities full legal status to boost budgetary transparency and accountability, roll out the DREAM digital platform on management of recovery projects to ensure transparent project tracing and procurement, and approval of the action plan for the implementation of the State Regional Development Strategy for 2021–2027.

In the area of **Social Transition**, the workload is divided between the Ministry of Social Policy and the Ministry of Development. The Ministry of Social Policy is assigned to draft a Social Code of Ukraine as an umbrella document for all state-provided social benefits and services. In parallel, it will prepare legislation introducing a pilot on 'basic social assistance'—a new approach in the social sphere for providing support to the most vulnerable groups. As part of its mandate, the Ministry will also be working on the framework for the Information System on Damage Caused to the Personal Non-Property Rights, in connection with the implementation of the law adopted in 2024, and run a nationwide verification of state payments to ensure that money reaches those who remain eligible. Complementing these efforts, the Ministry of Development is tasked with preparing amendments to the Law on Internally Displaced Persons to enhance verification procedures and reassess the actual number of displaced persons.

Within its functions in the area of the **Digital State**, the Ministry of Digitalisation must guarantee public access to 230 fully online services through the Diia portal and continue migrating services in line with the Action Plan on Transitioning State services into a digital form up to 2026. As part of this initiative, accessibility legislation currently in preparation, will ensure that every new e-service meets inclusive-design norms.

Several parts of the Plan target communities and individuals directly affected by the war. Humanitarian-demining operations will clear at least 507 km² of land and compensate farmers for clearance costs. Finally, a new state aid package guarantees basic goods for all released prisoners-of-war and provides annual payments to some 3 000 civilians unlawfully detained by Russia.

Coordination of evacuations

On 18 February 2025, the Government adopted [Resolution #178](#), updating the coordination of evacuations. This resolution aligns the implementation of the broader framework introduced in August 2024 (Resolution #911) with the original structure established by Resolution #845 in 2022.

In substance, the Resolution transfers day-to-day control of the Coordination Centre for Evacuation and Effective Response to Mass Displacement from the Ministry for Reintegration, which had chaired the body since its creation in 2022, to the Ministry of Development.

Under the new arrangement, the Vice-Prime-Minister – Minister for Development – chairs the Centre; the Deputy Head and Secretary now also come from the same Ministry. The list of participants was expanded to include the Deputy Minister of the Ministry of National Unity and the Head (or Deputy Head) of the State Service for Children.

The Coordination Center's core functions remain unchanged:

- synchronise national, regional and local evacuation plans, including transport logistics and reception capacity;
- provide technical guidance and real-time support to oblast administrations, military authorities and first responders;
- analyse lessons learned and feed operational improvements back into contingency plans;
- keep the public informed of assembly points, safe routes, collective sites and the package of social-legal assistance available en route and at destination points; and
- approve any oblast-level decision to order the mandatory evacuation of children.

Government restructure following dissolution of MinRe

Following the government restructuring, the Ministry of Reintegration was renamed Ministry of National Unity. However, the new Ministry did not assume the mandate of the former Ministry of Reintegration. Instead, most of its functions are being distributed among key ministries, notably the Ministry of Development and Social Policy structures.

As part of this restructuring, on 21 February 2025, the Government adopted [Resolution #181](#), along with a list of more than 20 companion amendments. In most cases, the content of the original resolutions remains unchanged, what is altered is the competent authority.

- Transfer of responsibilities: Ministry of Development becomes the legal successor for the full cluster of displacement-related areas that had been managed under Minreintegration before. In particular, this applies to Collective sites for IDPs ([Resolution #930](#)); list of territories affected by hostilities ([Resolution #562](#)); Register of deported and forcibly displaced persons ([Resolution #339](#)); and funds to support evacuees ([Resolution #1195](#)).
- Changes in references to ministerial orders: Some amended resolutions continue to refer to orders originally issued by the Ministry of Reintegration. These references are now updated, and the Ministry of Development is now responsible for these orders, with the jurisdiction clearly falling under its authority.
- Where earlier resolutions or orders refer to by-laws issued by the former Minreintegration, those citations are updated and the Ministry of Development is now responsible for these orders. The same technique is used to replace the now-obsolete reference to “Ministry of Infrastructure” with “Ministry of Development”, reflecting the merger and aligning with the Ministry’s current name

List of territories of hostilities

As of 28 February 2025, the Ministry of Development has enacted [Order #376](#), which officially establishes the current list of areas of hostilities (*a general term used to cover both areas of active fighting and temporarily occupied territories*). This list replaces the previously used MinReintegration Order #309 issued in 2022, which is no longer in force.

The updated list plays a critical role in determining eligibility for displacement-related benefits, including access to IDP allowances.

Other developments

Arranging the Workplace for a Person with a Disability

On 21 February 2025, the Government adopted [Resolution #273](#) amending the procedure, originally introduced in August 2023², for providing compensation to employers who adapt workplaces for employees with disabilities of the first and second groups.

The updated resolution expands the list of eligible applicants: in addition to corporate employers, private entrepreneurs with disability and self-employed professionals³ with a disability may now claim reimbursement when they equip a workplace for themselves.

The application deadline was extended to 180 days from the date of employment or registration as a private entrepreneur. Applications can be submitted in person to the regional employment office or online through the Diia portal. The procedure only covers new employees/newly registered private entrepreneurs.

² More in the [UNHCR Legislative Update for August 2023](#)

³ Participation of an individual in scientific, literary, artistic, creative, educational or teaching activities; activities of doctors, private notaries, private enforcement officers, lawyers, insolvency officers (property managers, rehabilitation managers, liquidators), auditors, accountants, appraisers, engineers or architects; persons engaged in religious (missionary) activities or other similar activities, provided that such a person is not an employee or a private entrepreneur.

The compensation ceilings remain unchanged:

- 15 minimum wages for persons with disabilities of the first group (120.000 UAH)
- 10 minimum wages for persons with disabilities of the second group (80.000 UAH)

The resolution also includes a detailed list of eligible items and services that can be compensated.

No compensation is available if the work is conducted in temporarily occupied territories or areas of active hostilities.

Recognition of school education received abroad

On 26 February 2025, the Parliament adopted [Law #4265-IX](#) amending the Law on Secondary Education by introducing a provision for the recognition of formal and informal education received abroad. The law does not apply to education obtained in the Russian Federation and is aimed at facilitating the reintegration of returnees.

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