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Exploring the accessibility of temporary accommodation for internally displaced women with disabilities

Assessment of inclusive emergency response



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Methodology of the study

Objective of the study

This study is aimed at analyzing the obstacles that prevent women and girls with disabilities from accessing mass accommodation centers for internally displaced persons and/or shelters for women and girls who have been subjected to violence both in the family and during Russia's full-scale war against Ukraine.

- Examine the available services for IDPs and victims of violence, including the accessibility of such services for women with different types of disabilities.
- Develop recommendations for national and local authorities to remedy the deficiencies.

Tasks of the study:

- Undertake a desk study of the current legal regulation of the work of mass accommodation centers for IDPs and shelters for victims of gender-related violence;
- Develop checklists for conducting the field monitoring of selected mass accommodation centers for IDPs and shelters for victims of gender-related violence;
- Develop a questionnaire for expert semi-structured interviews and define a list of experts to be invited for interviews;
- Select regions for testing the methodology and implement such testing, and, if necessary, make adjustments to the methodology after the first visits;
- Draft an analytical report with recommendations for stakeholders;
- Create an advocacy plan to foster the implementation of the study's findings.

The following methods were applied to achieve the objectives of this study:

- A desk study of the legal framework, as well as a review of changes in legislation that have occurred since the start of Russia's full-scale war against Ukraine;

- Conducting a field stage, which involves observational visits to mass accommodation centers for IDPs to assess the architectural accessibility of such centers and whether the services offered there are accessible to women with different types of disabilities;
- Expert interviews conducted by specialists and/or representatives of the shelter administration with women who suffered from violence during Russia's full-scale war against Ukraine.

With limited time, human and financial resources, this study will focus on mass accommodation centers for IDPs and shelters for women who suffered from violence in three cities: Kyiv, Dnipro, and Lviv. Moreover, the interviews with experts will also address the situation regarding the accessibility of shelters in these cities.

However, despite all the constraints, the project team will manage to compare the situation with the accessibility of shelters in different areas, bearing in mind the hostilities on the territory of Ukraine (in the area of rocket attacks in Lviv and Kyiv, as well as in the areas of artillery shelling in Dnipro), and provide the most comprehensive recommendations for the authorities and other stakeholders. We would like to emphasize that every city we monitor hosts a large number of IDPs, including women and girls with disabilities.

Section 1.

Legal regulation for the arrangement of different types of temporary housing

During this project, a desk study was carried out to analyze the results of previous research by NGOs on issues related to the organization and provision of social housing, the creation of temporary accommodation centers for IDPs, modular towns, and crisis centers for victims of domestic violence, as well as to examine changes in the legal framework that have been introduced since the full-scale invasion. This analysis is not meant to describe all existing regulatory issues, but instead focuses on gaps in the regulation of standards and control over accessibility of all the above types of temporary housing for girls and women with disabilities.



There are plenty of studies of gaps in the legal framework for housing policy in Ukraine, and this project has already examined some of them, including those related to the following issues:

- Social housing policy;
- Crisis housing policy concerning the temporary accommodation of a large number of internally displaced persons, including the creation and management of modular towns;
- Creation and operation of crisis rooms, shelters, and long-term accommodation centers for victims of domestic and/or gender-related violence;
- Accessibility of the existing housing stock of various types, including crisis housing.

To meet the objectives of the proposed study, we will use the terms in the following meaning:

[Social housing](#) refers to housing stock supplied by the state, municipalities, and non-profit organizations to provide housing for people who cannot obtain it through market channels (purchase or rent). It is essential that social housing is not acquired by its residents.

According to Part 2 of Article 10 of the [Law of Ukraine “On the Social Housing Fund”](#), the following persons are entitled to a social housing registration:

1. Those lacking housing or entitled to improve their housing conditions according to the law;
2. Those with an average monthly gross income for the past year per person below the subsistence minimum and “the amount of the indirect cost of renting (leasing) housing in the given locality”;
3. IDPs with no other housing in the territory controlled by Ukraine or whose housing was destroyed (since 2018).

Temporary housing to accommodate internally displaced persons. Statutory documents contain no definition of this concept, as well as no definition of “accommodation”, “shelter”, or “place of compact settlement of internally displaced persons” (the most commonly used terms for temporary housing). Meanwhile, [the Procedure for the Functioning of Temporary Accommodation for Internally Displaced Persons](#) uses the term “housing bed space”, which refers to a part of a room with a bed and furniture for storing personal belongings with bedclothing (mattresses, pillows, blankets, and bed linen) provided for temporary compact accommodation

of several adults of the same sex, not related to each other by common household or family (kinship) relations.

Places of temporary housing can be arranged in:

- Modular towns,
- Dormitories,
- Health camps,
- Recreation centers,
- Resort houses,
- Boarding houses,
- Hotels,
- Temporary structures and complexes thereof intended for life sustenance (temporary accommodation and care) of internally displaced persons,
- Other residential premises suitable for living and in their parts that are used or can be used for temporary housing of internally displaced persons, with a total number of equipped places for 10 or more people.

Places of temporary housing may be equipped with utility facilities and premises not suitable for living, which are intended to ensure the operation of places of temporary housing as an integral complex and their household services.

Thus, the term “place of temporary housing for internally displaced persons” is defined as various forms of temporary housing not owned by individuals, provided by local authorities or rented from NGOs or charitable foundations, and shared by people living together.

Modular town. Similarly to the previous one, we failed to find a definition of the term “modular town” in the current statutory instruments of Ukraine. However, the description of a modular town that best characterizes the modular towns that are being massively built in Ukraine after a full-scale invasion is a settlement built of modular structures, consisting of multiple residential apartments, which often form several rows. A modular town can serve as both temporary and permanent housing.

[The Law of Ukraine “On Regulation of Urban Development Activities”](#) defines a temporary structure, which, in fact, can be understood as the

definition of modular housing. A temporary structure for the population's living is a low-story (up to two floors high) fast-mounted structure of lightweight construction (mobile (inventory), prefabricated, container or combined type, etc.) that meets the minimum requirements for the well-being of internally displaced persons established by the Cabinet of Ministers of Ukraine and can be dismantled and moved with or without further reuse.

A shelter for victims of domestic and/or gender-related violence is a place where victims, including those with minor children, can temporarily reside. Such shelters can be communal and operated by NGOs or private service providers.

[The Model Regulation on shelters for victims of domestic and/or gender-related violence](#) identifies a shelter as a specialized support service for victims of domestic and/or gender-related violence, including sexual violence, associated with the armed conflict (hereinafter referred to as victims).

[The Resolution of the Cabinet of Ministers of Ukraine No. 824 as of August 21, 2019](#), defines the notion of a day center for social and psychological assistance to victims of domestic violence and/or gender-related violence. This means a specialized support service for victims of domestic violence and/or gender-related violence, including sexual violence, associated with the armed conflict.

A day center is intended to provide comprehensive social, psychological, and primary legal aid, as well as social services to victims, including in cases where such persons have applied with their child, and to ensure that they can (if necessary) stay for a short-time or a full-time period in a specially equipped room at the day center, which is supplied with utilities and intended to provide short-time or full-time services to victims who have applied to such a center (crisis room).

PREVIOUS STUDIES ON SOCIAL, TEMPORARY, AND CRISIS HOUSING

Previous studies¹ on the availability of different types of temporary housing for internally displaced persons and victims of domestic and/or gender-related violence suggest the following key gaps in the current legal framework for providing different types of social and temporary housing:

- The liability for regulating, creating, and maintaining different types of social, temporary, and crisis housing is imposed on different authorities, and the respective powers are distributed in a way that makes it impossible to make effective decisions and control their implementation.
- The management of social and temporary housing and the registration of those in need of such housing have always been and remain fragmented and inefficient. The number of people listed on the housing register as needing social housing does not correspond to the actual figures (at least the number of internally displaced persons).
- Social and temporary housing stocks were small. For example, there were a total of 1,098 social housing units and 1,997 temporary housing units in Ukraine as of January 1, 2021. Unfortunately, much of this housing ended up in the temporarily occupied territories with the onset of full-scale war. For instance, the largest number of temporary housing units in Ukraine was in Donetsk and Zaporizhzhia regions, while Mariupol was one of the leading cities in terms of building up temporary housing stocks since 2014.

As of 2022-2023, [several](#) local administrations still lacked social housing stocks and registration of those who should be listed as persons in need of social housing.

The liability for creating and managing crisis housing rests with local governments. The [current](#) number of crisis housing in Ukraine, both in communal ownership and maintained at the expense of international and national donors, is rather [low and fails to meet all needs](#).

There are no centralized reports on the availability of temporary and crisis housing. [Explanations](#) on the procedure for registering those in need of social and temporary housing are merely official and do not provide algorithms for those in need of architecturally accessible housing. Likewise, there is a [lack of information](#) on accessible crisis housing and services for girls and women with disabilities being survivors of domestic and/or gender-related violence.

1 Refer to the list of analyzed studies in Annex 1 (References).

The list of required documents to receive temporary or crisis housing services is excessively onerous and often not feasible for people who find themselves in “difficult life circumstances” (as the social services legislation puts it). Instead, the explanations provided by the [Diia portal](#) merely cite the application procedure and this list of documents. It lacks instructions on what a person can do if he or she does not have these documents and cannot obtain them quickly.

The shifting attitudes of central and local authorities toward the construction and use of modular towns are worth mentioning. From an analysis of [public statements](#) made by representatives of central and local authorities, it appears that Ukrainian officials do not consider modular towns to be an effective and lasting solution to the need to accommodate a large number of internally displaced persons, although they do not offer alternative solutions. Nevertheless, the active construction of modular towns continues at the local level.

Key concerns of modular towns:

- Temporary accommodation of people becomes permanent due to the lack of coordination between state and local authorities. People sheltered in modular towns are not offered any other solution to the loss of housing.
- Persons who usually settle in modular towns are mostly people who have lost their homes and usually have low incomes or other factors that may affect their situation, such as age, disability, marital status, etc.
- There is a lack of employment for these people, and they are unable to improve their financial situation to rent housing independently.
- Modular towns are turning into segregated settlements; there are few social ties between the residents of modular towns and the local population.
- The conditions in the modular towns are poor and not suitable for long-term living. Shared living conditions, lack of social unity, and integration into the community hurt residents and their dignity.

The Minister for Communities, Territories and Infrastructure Development has a [different position](#), emphasizing the assessment of previous experience in the development of modular towns and taking it into account when building new ones:

- Selecting the location of the town based on its access to urban infrastructure.

- Placement of towns in areas with a large number of IDPs and/or in the de-occupied territories with a significant percentage of the population who have lost their homes.
- Analyzing the city employment market and, accordingly, the ability to employ residents; availability of social workers and psychologists in the towns.

Experience in implementing modular towns that local authorities should pay attention to:

1. Areas for building modular towns should be selected to ensure that all civil and transportation infrastructure is easily accessible to their residents.
2. Before building, it is crucial to check the availability of a sufficient number of workplaces for the able-bodied population or to take care of creating new ones in advance.
3. Temporality is a key feature of modular towns. Therefore, it is the duty of the local authorities to develop a strategy that will allow IDPs to obtain permanent housing in a reasonable period.
4. A major driver of comfort for residents of modular settlements is the landscaping of the surrounding area. Neglecting this matter reduces the chance of providing people with decent living conditions and creating at least some feeling of comfort for them.
5. It is critical to maintain a balance between creating a strong community within the town and building social ties between IDPs and the outside world. This prevents people from being “locked in” by common internal problems and focusing only on the traumatic experiences of the past.
6. While [local authorities have stated](#) that the time people can stay in modular towns is limited to 1 year, there are no plans for further accommodation of people and no intention to provide them with permanent housing to replace the destroyed ones, etc.

CURRENT LEGAL FRAMEWORK AND ISSUES OF ARCHITECTURAL ACCESSIBILITY OF SOCIAL, TEMPORARY, AND CRISIS HOUSING

This desk study of the current legal framework is mainly intended to verify whether accessibility standards are applied to the creation and reorganization of all types of temporary housing, i.e., to check whether the requirements for compliance with state building codes are mandatory when creating, building, or reorganizing premises for temporary accommodation of internally displaced persons and/or victims of domestic and/or gender-related violence.

GAPS IN THE CURRENT LEGAL FRAMEWORK IN TERMS OF REQUIREMENTS AND COMPLIANCE WITH ACCESSIBILITY STANDARDS FOR DIFFERENT TYPES OF TEMPORARY HOUSING

Temporary housing for internally displaced persons is governed by the current Resolution of the Cabinet of Ministers of Ukraine No. 930 as of September 1, 2023, on [“Some Issues of Functioning of Temporary Accommodation Places for Internally Displaced Persons”](#).

This Resolution is only applicable to temporary accommodation places set up since September 1, 2023. It does not refer to the state building codes, in particular those related to accessibility.

However, according to the minimum requirements for temporary accommodation places defined in [clause 8](#), the following accessibility requirements for internally displaced persons with disabilities should be ensured:

- The temporary accommodation place shall be equipped with means of unimpeded access for persons with disabilities and other persons with reduced mobility to the premises of the temporary accommodation place, including common areas and rooms with bed spaces;
- The temporary accommodation place shall be equipped with at least one shower/one bathtub and one toilet equipped for persons with disabilities and persons with reduced mobility;
- If there are no sanitary and hygienic facilities in the temporary accommodation places, they shall be located at a distance of no more than 50 meters from the living rooms, except for sanitary and hygienic facilities for persons with disabilities and other persons with reduced mobility;

- The temporary accommodation place shall be equipped with the simplest shelter and/or located within 500 meters of the shelter with a capacity not less than the number of bed spaces provided in the temporary accommodation place (taking into account the staff of the temporary accommodation place). If persons with disabilities and other persons with reduced mobility are settled in the temporary accommodation place, the shelter must be equipped for such persons with means of unimpeded access to these facilities.

The administration of the temporary accommodation place shall:

- Apply to regional, Kyiv or Sevastopol city and district state administrations (military administrations) for relocation of persons with disabilities and other persons with reduced mobility to temporary accommodation places equipped with the necessary means of unimpeded access for persons with disabilities and other persons with reduced mobility, provided that there are conditions that make it impossible for such persons to move freely around the premises of the temporary accommodation place and use sanitary and hygienic facilities;
- Accommodate persons with disabilities and other persons with reduced mobility according to the requirements for unimpeded access of persons with disabilities and other persons with reduced mobility and the number of floors of the facility;
- Not allow discrimination against internally displaced persons by race, skin color, political, religious and other beliefs, gender, age, disability, ethnic and social origin, citizenship, marital and property status, place of residence, language or any other grounds.

This Resolution includes standard provisions regarding a checklist for monitoring temporary accommodation places, a spreadsheet listing temporary accommodation places, model rules, etc. None of these templates contain accessibility criteria and indicators.

In addition, this Resolution does not make clear what accessibility criteria should be applied by the administration of temporary accommodation places. The requirement for an accessible shelter also contains no reference to the minimum [accessibility standard for civil defense facilities](#). The Resolution lacks a mechanism to monitor the implementation of its provisions.

MODULAR HOUSES AND TOWNS

Modular buildings (structures), as well as their erection and placement, are regulated by the Law of Ukraine [“On Regulation of Urban Development Activities”](#), the most recent amendments to which in no way addressed the regulation of modular towns, their accessibility, or the provision of civil defense facilities therein.

According to Article 9 footnote 2 of the Final Provisions to the Law (as of May 2022), during the period of martial law or a state of emergency in Ukraine or certain areas of Ukraine and for one year after its termination or cancellation:

“1) Placement of temporary structures, their complexes intended for living (temporary residence and support) of internally displaced persons (hereinafter referred to as temporary structures for living), engineering networks required for the functioning of such structures shall be allowed on land plots of any category, except for lands of the nature reserve fund and other environmental protection purposes, lands of historical and cultural purpose, and forestry lands without changing their designated purpose. Other facilities shall be located on the said land plots according to the designated purpose of the land plots.”

A modular (temporary) structure is a:

- Low-story (up to two floors high) building;
- Fast-mounted structure made of lightweight materials;
- Structure that meets [the minimum requirements for the well-being of internally displaced persons established by the Cabinet of Ministers of Ukraine](#) and can be dismantled and moved with or without further reuse.

The current law contains no mandatory requirement to comply with the criteria of state building codes for accessibility or to take into account accessible infrastructures when choosing a location for a modular town.

It was only in August 2023 when the Cabinet of Ministers developed and approved the [Procedure for the development, approval, and publication of a scheme for the placement of temporary structures for living, its composition and content, requirements for temporary structures for living, their erection, relocation, and dismantling](#), which should determine, in particular, the accessibility and inclusive nature of modular towns, indicating, among other things, that all previously constructed towns have not been assessed for accessibility.

This new Procedure now includes the term “accessibility requirements,” which is defined as a set of requirements that make it possible to ensure that persons with disabilities and other people with reduced mobility can use temporary structures and the surrounding area equally with other persons.

The key differences implemented by this Procedure in terms of ensuring the rights of people with disabilities (compared to the construction of modular towns before):

- The territory for the placement of temporary structures (complexes of temporary structures) shall be selected with due regard to the presence (at a distance of up to 500 meters to such structures) of civil defense structures included in the civil defense fund.
- Mandatory information on the primary systems of social services for the population, including the population affected by emergencies, hostilities, or terrorist acts, evacuated population, internally displaced persons, as well as persons involved in the inspection and restoration of damaged facilities, liquidation of the consequences of emergencies, hostilities, or terrorist acts (for complexes of temporary structures).
- Availability of mandatory information on accessibility (inclusion) for people with reduced mobility, including physical and information barrier-free accessibility.
- If there are no civil defense facilities nearby, the layout and plan of the modular town should include an estimate for the construction of a civil defense facility.

The requirements for temporary structures contain specific (measurable) criteria for their accessibility, including the indication of the relevant DBNs that should be followed by planners, such as [DBN B.2.2-40:2018 “Buildings and structures. Inclusion of buildings and structures. Main provisions”](#).

The requirement to accommodate people with disabilities and people with reduced mobility on the ground floor.

- The requirement to approve the finished building by a three-member commission and involve representatives of public associations (including persons with disabilities) in the commission upon written request.

The only unresolved issue is whether similar criteria will be applied to fix the deficiencies in those modular towns that have already been built and put into operation by August 2023.

CRISIS HOUSING FOR VICTIMS OF DOMESTIC AND/OR GENDER-RELATED VIOLENCE

This study was not intended to analyze all issues concerning crisis housing for victims of domestic and/or gender-related violence, instead, the analysis of the current legal framework was performed solely in terms of the availability or absence of accessibility standards for such crisis housing and, accordingly, its adaptation to the needs of girls and women with disabilities.

[The Model Regulation on shelters for victims of domestic and/or gender-related violence](#) provides no clear criteria on how shelters should be made accessible to girls and women with disabilities or mothers with children with disabilities. The only reference to an “established procedure” is far too ambiguous to be enforceable:

“34. The premises (building, structure, or part of a building) where the shelter is located must be supplied with all types of utilities, meet sanitary and hygienic standards and fire safety requirements, and be equipped to ensure the safety of persons staying in the shelter (including shelter staff).

People with disabilities and other persons with reduced mobility shall be ensured access to the building and premises of the shelter and the adjacent territory, as well as reasonable adjustments and flexible design of the shelter premises according to the [Law of Ukraine](#) “On the Fundamentals of Social Protection of Persons with Disabilities in Ukraine” and the requirements of state building codes, standards, and regulations.”

[The Model Regulations on the day center for social and psychological assistance to victims of domestic violence and/or gender-related violence and on the specialized service for primary social and psychological counseling of victims of domestic violence and/or gender-related violence](#) fail to provide even such general information on accessibility for such persons. There is no mention of the fact that the day center and crisis room² can be visited by girls and women with disabilities, or that they may need architectural or informational accessibility.

2 “A day center is intended to provide comprehensive social, psychological, and primary legal aid, as well as social services to victims, including in cases where such persons have applied with their child, and to ensure that they can (if necessary) stay for a short-time or a full-time period in a specially equipped room at the day center, which is supplied with utilities and intended to provide short-time or full-time services to victims who have applied to such a center (hereinafter referred to as crisis room)”

Statistics

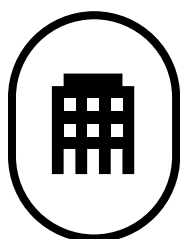
4.8
million

internally displaced persons are registered
[According to the National Social Service](#)

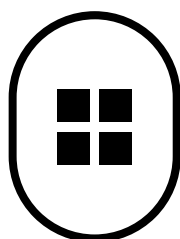
50
billion USD

the total cost of damage to the housing sector is over 50
[A Rapid Damage Assessment](#) conducted by the Ukrainian government between February 2022 and February 2023 estimates

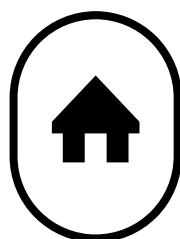
including
106 280
with disabilities.



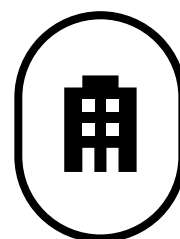
Apartment buildings represent the largest share of damage with over **7%** of the total destruction



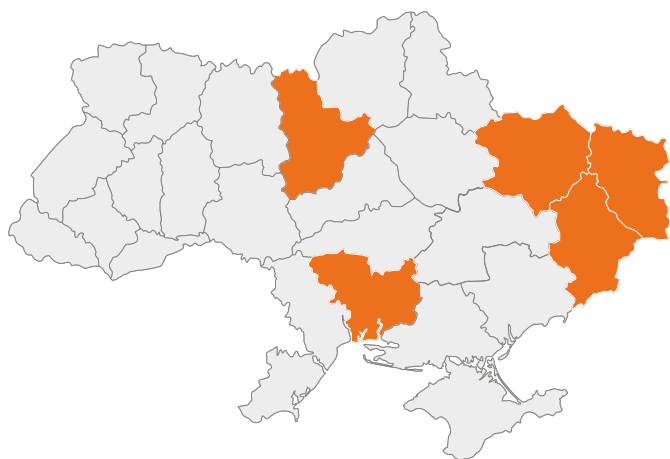
Since June 2022, about **564,000** residential units (apartments) have been reported as damaged



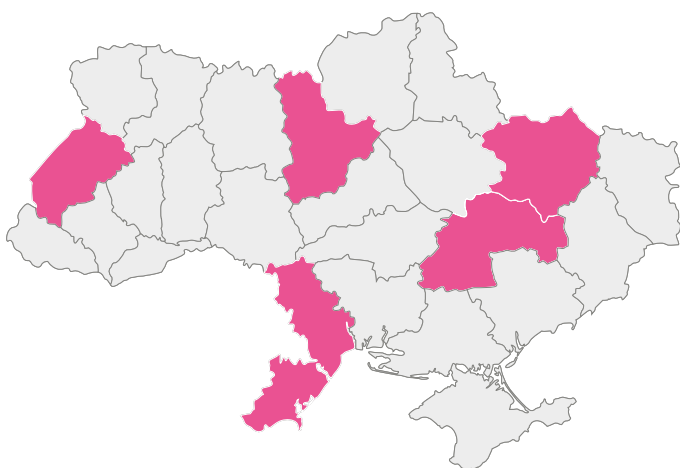
It is estimated that **135,000** private homes were damaged as well, representing approximately **9%** of the total residential sector assets affected



The number of damaged dormitories has also risen from **13,312** in June 2022 to **39,040** units

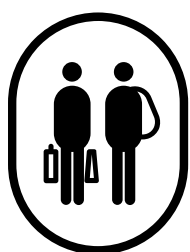


Donetsk, Kharkiv, Luhansk, Kyiv, and Mykolaiv regions suffered the largest number of damaged residential buildings.



Kyiv, Dnipropetrovsk, Kharkiv, Lviv, and Odesa regions host the largest [number](#) of internally displaced persons so far.

By the end of 2023, the housing loan program for internally displaced persons amounted to only [650 loans granted](#).



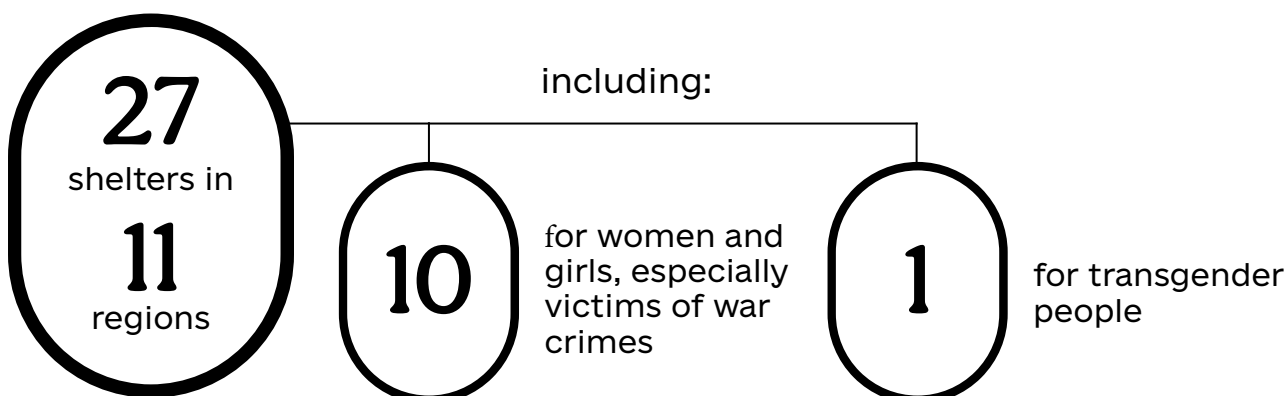
116 000

people were living in temporary housing (of various types).

[According to the OCHA](#), as of October 2023, 116,000

There is no public information on the availability of all temporary accommodation places for internally displaced persons, nor is there a unified database of shelters for victims of domestic and gender-related violence.

The FFR team managed to compile information from open sources about



Moreover, the public domain, as well as the websites of regional councils, local administrations, and civic and charitable initiatives, lack information on temporary accommodation places accessible to people with disabilities and shelters for girls and women being victims of domestic and gender-related violence.

Section 2.

Actual state and gaps in the current provision of temporary and crisis housing

During the field stage of the study, 13 temporary accommodation places for internally displaced persons and locals who lost their homes were monitored in Kyiv, Lviv, and Dnipropetrovsk regions.



All of the places visited can be divided into the following categories:

- Modular towns
- Resort houses
- Dormitories

Meanwhile, the monitoring covered places of different types of ownership such as communal and private (mostly affiliated with a charitable foundation, a public organization, or a religious organization).

According to the interviews conducted with the staff and persons with disabilities living in the shelter when the monitoring was conducted, as well as a general inspection of the shelter and the adjacent territory, the following conclusions were made and recommendations for different types of shelters were developed based on the checklist.

1 MODULAR TOWNS

Modular towns or places of compact settlement are a type of temporary housing offered not only to internally displaced persons but also to locals who lost their homes during the war.

A typical modular town comprises a fenced area with rows of modular buildings of various types.

As part of this field research, two types of modular towns³ were visited:

- Large modular houses with a hallway, bathrooms, and a common kitchen, as well as rooms with bunk beds (one monoblock consists of 40 modules with rooms, a recreation area, a kitchen, bathrooms, and showers);
- Modular structures with separate apartments (one module consists of three separate apartments).

Three such modular towns in the Kyiv region were checked as part of the monitoring. They are notable for the fact that they mostly house not internally displaced persons, but locals of Kyiv region whose houses were destroyed during hostilities.

³ There are also other types of modular structures not covered in this study.



Photo of a modular town in the Kyiv region

According to the checklist produced by a specific methodology, security issues were studied and the following elements were checked:

- The adjacent territory of modular towns,
- Entrance unit to the territory and front door of several buildings,
- Horizontal communications,
- Main premises and sleeping areas,
- Toilets.

Besides, the monitoring included interviews with the caretakers of the towns and the residents, including those with disabilities.

Adjacent territory

Each modular town visited in the Kyiv region is located far from the main streets of the cities. It was also found that one of the modular towns is located too far from public transport stops, which in turn makes it less accessible for the people living there, especially since there is no centralized catering or medical care in the town. However, there is a hospital next to the town, and, according to an employee of the facility, all residents of the town can seek medical care at this medical facility. According to the caretaker of another modular town in the Kyiv region, it is located near the premises of the city social protection service.

Furthermore, the adjacent territory of one of the modular towns in the Kyiv region lacked asphalt pavement and sidewalks, and the road was covered with fine stones. To enter the territory, people living in the town must walk through a narrow passage with a step. There is a gate nearby, but it was locked during the monitoring.



Photo of a modular town in the Kyiv region

Another modular town in the Kyiv region is also located far from public transportation routes. However, unlike the previous one, this one features a walkway lined with paving slabs. There are also benches and a lot of greenery in the adjacent territory. Yet, despite the attractive appearance of the area, there is also a problem with architectural accessibility, as the entire territory is laid out with curbs along the sidewalks. Although they are slightly lowered, they can still impede movement for people with disabilities.



Only one modular town in the Kyiv region monitored during this study has a separate parking lot for residents' vehicles.

Photo of a modular town in the Kyiv region

Front door and entrance unit

There are statements in the modular towns that they were built at the expense of international assistance programs for Ukraine.

Several violations of the architectural accessibility guidelines have been recorded:

- In one of the modular towns, there are iron stairs without handrails in front of the entrance to each block, with no step markings or warning tactile stripes. When the monitoring took place, the steps were poorly maintained and had traces of rust. It is worth noting that in the modular town in Makariv village, a ramp was installed in front of the block for women with disabilities, but not in line with the requirements. The ramp's surface is iron, the handrails are not securely fastened, and there are no warning tactile strips or markings. There was not enough space in front of the ramp, so wheelchair users could not access it. Moreover, only one block of the town had such a ramp, while all other blocks were equipped with stairs.



Photo of a modular town in the Kyiv region

- Another modular town in the Kyiv region also showed issues with architectural accessibility. Despite not having as high a staircase as the previous one, there were two unmarked and non-sloping steps at each door to individual apartments. According to residents, there was also a ramp, but it was available upon request.
- Another town in the Kyiv region had inaccessible entrances to the common dining room where residents are served lunch and to several old buildings located in a former resort house.

Still, there were some positive aspects. Both modular towns had a canopy over the stairs. In one of them, a ramp was also covered by such a canopy.

Notably, door steps were installed at the entrance to the housing units in two of the three modular towns in Kyiv region where the monitoring was conducted. Although the door is easy to open and the handle is at a comfortable height, the presence of such door steps makes the premises partially accessible to people with disabilities. The entrance to the units has no surface, except for the iron staircase, so it can be slippery during rain or snowfall.

Horizontal communications

There is a 2.1-meter-wide hallway in each of the modular towns in the Kyiv region. During the monitoring, no unnecessary obstacles were found in the way of movement. However, despite the absence of unnecessary objects, minor floor elevations were observed in the hallway. Moreover, there was a lack of handrails everywhere. The floor in the hallways was covered with linoleum, and at the time of the monitoring it seemed to be of satisfactory sanitary condition. There were also two benches in the hallway.

One of the shortcomings noted is the lack of lighting. Despite the fact that each block has lighting, it was half dim in the hallway during the monitoring. Furthermore, the buildings of the modular town, including the hallways, lack access to the Internet and mobile communication, which restricts the ability of residents to use mobile phones and computers while in the building, as well as to keep in touch with their families.

Main premises/sleeping areas

As far as possible, families or several single women or single men, three to six in a room, are accommodated in modular towns built of monoblocks where people live in separate rooms and share a hallway, kitchen/dining room, showers, and toilets (Kyiv region). There are separate female and male restrooms and showers.

By contrast, modular towns with separate apartments are mostly inhabited by families living in a single apartment with all areas for private use, including private entrances.

A room with two women with disabilities was checked during the monitoring. All in all, the sanitary condition of the room was unsatisfactory, there was a lack of space in the room, too little shelving space for personal belongings, and the room was not adapted to the needs of people with disabilities.



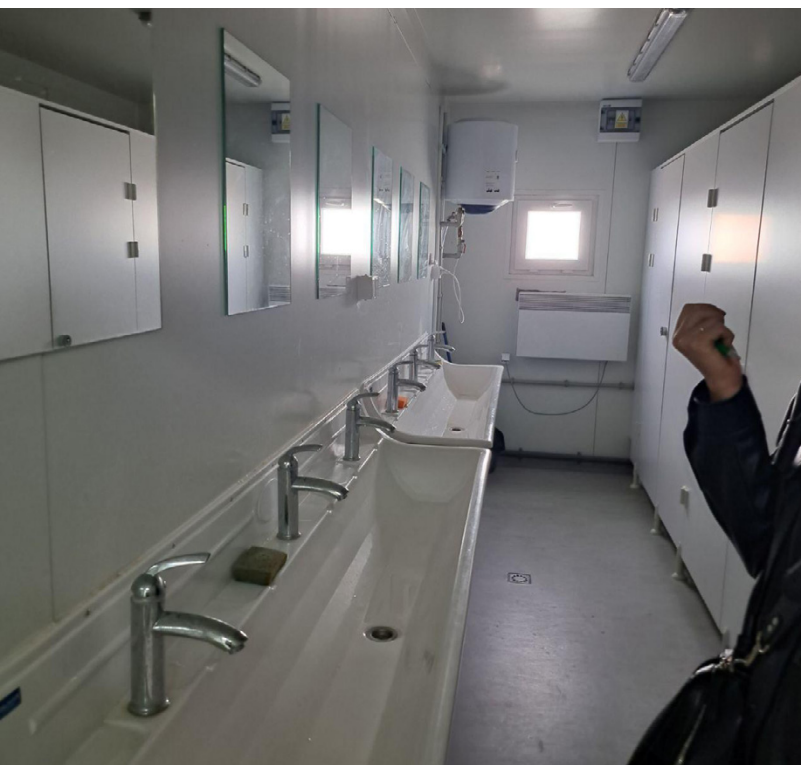
Photo of a modular town in the Kyiv region

Finally, the lack of adaptability of the space for people with disabilities was evidenced, which, among other things, is reflected in the following aspects:

- Window handles are too high (approx. 1.5 m);
- Switches are too high (approx. 1.25 m);
- A passageway in the room is too narrow (approx. 50 cm);
- Beds are not adapted to the needs of people with disabilities. During the monitoring, four bunk beds were installed in the room; the bottom bed was too low to the floor (about 20 cm from its surface), while a ladder was required to reach the top bed.

Similar to the hallway of the block, the floor in the examined room is covered with linoleum. There are also two metal-plastic windows in the room. The sockets are not properly labeled. The only furniture available in the room was a table, a self-made chair, and a wardrobe. Given that three people lived in the room, one wardrobe was not enough to store all personal belongings, so much of the stuff was piled on the table, floor, and beds. Moreover, there was no refrigerator in the room, so food was also kept on the table.

When interviewed, a respondent also pointed out the lack of mobile communication in the building, as was already reported in the hallway of the block, and the need to go outside or lean through a window to use a cell phone.



Toilet

There are two gender-specific toilets in large monoblocks. No separate accessible toilet is available. When inspecting the toilets, four stalls were observed in one of them. The toilet also had two sinks with six taps for shared use (1.2 m high), a boiler, clothes hooks, and six mirrors. There were no shelves near the sinks. The flooring was covered with linoleum.

Photo of a modular town in the Kyiv region

Several toilets had almost no free space, as the room was filled with bottles of industrial water. Altogether, the free space was about 70 cm. Toilet stalls were also filled with water bottles.

Similar to the room, the toilet is not adapted to the needs of people with disabilities. Beyond the fact that there is little to no free space inside, there are no handrails near the sinks and toilets.

Security issues and electricity and heating autonomy

While monitoring the modular towns in both cities of the Kyiv region, no shelters were found on the territory. Instead, residents are offered to hide in a nearby hospital, in the basement of a neighboring building, in a resort house, etc. Moreover, there are no markings on the territory regarding the emergency plan in case of an air raid alert and no pointers to the shelters.

Meanwhile, a respondent in one town said that the hospital shelter was almost inaccessible, with no way to get down there, while the caretaker in another town emphasized that residents “are not willing to go to the shelter”.

The monitoring was carried out in the autumn of 2023 when it was still warm, and all the modular towns were equipped with generators. In the modular town with separate apartments, air conditioners were installed to heat the premises.

According to the locals, there were very prolonged blackouts in the winter of 2022-2023 with no generators available.

Services

Modular towns do not provide regular services, as there are no social workers, psychologists, or nurses. The town is permanently managed by a caretaker who is also a resident of this town. In certain monoblocks, some caretakers work as volunteers, and some residents help to keep order, resolve conflicts, and provide assistance to other residents. The respondents have different attitudes towards the positions of such caretakers and report constant conflicts, which is why there is a need for psychological services, social workers, etc.

As mentioned above, there is an opportunity to get medical care in the hospital, there are social protection departments located nearby, and volunteer psychologists (sometimes without a stable work schedule) visit the towns. One of the modular towns displayed a stand with leaflets on how to get aid and announcements of various events.

Interviews with residents

There were several interviews with residents of the modular towns, some of whom had disabilities. Notably, during one of the interviews, the town's caretaker approached the respondent and in certain instances corrected her answers. Moreover, other residents of the town reported a neglectful attitude towards people with disabilities, which was allegedly explained by increased attention to the needs of such people. The town caretaker was also using Ableist⁴ statements while communicating with the residents, in particular, she was urging two residents (a woman with a disability and her mother) to move to an orphanage because, she believed, they would be better off there.

Issues stressed by residents:

- The need to bring potable water from a remote location,
- No locks on the doors,
- Switching off lights in shared areas at night,
- Lack of information about services and support for internally displaced persons and/or people with disabilities,
- Lack of shelters and/or their distance from residential premises,
- Inadequate adaptation and inaccessibility of the town for people with disabilities.

Analyzing responses from caretakers

The caretaker of one of the modular towns in the Kyiv region provided rather vague answers to all the questions. According to her, there are no problems and all the residents are happy with everything. The only thing they are interested in is finding out more about the possibility of receiving humanitarian aid or certain services. According to the caretaker, they keep in touch with the social protection department, and all the needs of the residents, including information on ways to prevent domestic and gender-related violence, are met; there is no need for psychological counseling, although residents took advantage of the opportunity to seek it when psychologists from NGOs visited the town.

⁴ Ableism is a type of discrimination based on health conditions and disabilities when only a person without disabilities or visible health problems is considered to be full-fledged.

So far, no cases of violence, including gender-related violence, have been reported in any of the towns. However, based on how quickly the caretakers replied to this question, we can at least assume that the topic is still rather sensitive. It is worth noting that those caretakers who agreed to answer the question tried to be concise, not to say something “unnecessary and not to complain about anything.”

Conclusions



As a whole, the monitoring of modular towns in the Kyiv region revealed the following accessibility violations that need to be addressed: curbs and steps at the entrance and in the adjacent territory, lack of marking of the modular town as a place for IDPs, lack of marking and warning tactile stripes, lack of ramps or their non-compliance with the principles of architectural accessibility. A more thorough monitoring of one of the modular towns also revealed such violations as the lack of an accessible entrance to the territory, lack of road pavement, lack of lighting in the hallways of the blocks, door steps at the entrance and in the hallways, narrow space in the rooms and toilets, too high window handles, beds not being adapted to the needs of people with disabilities, inaccessible toilets, lack of shelter on the territory of the town, and insufficient information about the services available to IDPs.

2 RESORT HOUSES

The other type of temporary housing intended specifically for internally displaced persons is resort houses. One of these was inspected in the Kyiv region. Apart from the resort house itself, there is also a modular town built on its territory.

Adjacent territory

One of the modular towns is located in the city on the territory of a resort house. It was observed that the entrance to the territory is inaccessible, as there are two steps in front of it. No ramp is available. There are also steps at the exit of the resort house gate. The road pavement around the resort house was in poor condition with pits, and one of the pits was repaired with wooden boards.



During the monitoring, there was a generator on the territory in case of a power outage. Besides, there were special signboards pointing out how to get to the buildings, the playground, the bicycle parking lot, and the tent camp. In addition to these wayfinding signs, there was a banner with a map of the resort house and modular town, as well as the rules of living in the town.

Photo of a resort house in the Kyiv region for internally displaced persons

While no shelters are located in the resort house, there are signs and a list of addresses of the nearest shelters, as well as contacts for emergency services in the city. The nearest shelter is located 400 meters from the resort house.

On top of that, a set of rules for living in the resort house was printed out including curfew provisions, contacting the caretaker in case of emergency, maintaining order, not smoking on the premises, not drinking alcohol on the premises, and not playing loud music.

Services

The residents of the resort house are informed about the services available to IDPs. For example, leaflets with information about the mobile social and psychological assistance team and free classes for children are posted at the entrance to the building. There is also a centralized catering service with food vouchers.

Conclusions



When monitoring the resort house, the following positive aspects were observed: information about the services provided to IDPs, navigation around the territory, signs with the addresses of shelters and emergency contacts, and a power generator. Still, the entrance to the resort house, which at the time of the monitoring had two steps without a ramp, and the road pavement on the territory, which in some cases was in poor condition, were among the things that should be improved in terms of architectural accessibility.

3 DORMITORIES

Most of the monitoring missions were made to dormitories. This is yet another type of temporary housing for IDPs. In total, nine such dormitories were monitored. Most of these temporary housing facilities are either owned by communal enterprises (CE Zhilservis), a religious organization (Church of the Disciples of Jesus Christ), or leased from NGOs or charitable foundations (CF “Your support”, CF “Depaul”, CF “100% Life”, NGO “Source of support”, CF “Good on Amur”).

Adjacent territory

Unlike resort houses and modular towns, most of the dormitories are located within cities (Dnipro, Kyiv, and Lviv), which makes it easier to access infrastructure, including public transport, stores, pharmacies, hospitals, social service centers, and educational institutions. There are public transportation stops close to most of the dormitories.

Outside one dormitory, construction works were underway. Consequently, the sidewalk was blocked, making it difficult to access the building, as the only way to get to the shelter was to follow the sidewalk on the parallel side of the street. The sidewalk is bordered by curbs. There was no sidewalk at all near another dormitory. In two dormitories, the adjacent territory was paved with cobblestones, which also complicated access to the shelter. In all other cases, the road near the shelter had a tile or asphalt pavement.

Only one of the dormitories had a ramp at the entrance (Kyiv, shelter from CF “Depaul”), while the rest lacked both ramps and steps at the entrance. Several dormitories experienced difficulty traveling on the sidewalk due to violations of parking rules, stairs, curbs, and the lack of slopes.

All the visited dormitories lacked warning tactile stripes on the roadways.

Front door and entrance unit

Most dormitories, except for the dormitory owned by CE Zhilservis in Dnipro, lack signs stating that the building is a shelter for IDPs.

Several dormitories (mostly those where temporary housing for internally displaced persons occupies the entire building, not just a few floors) lacked stairs. Staff members of the dormitories also reported that they tried to accommodate people with disabilities on the ground floor. Where

steps are available, there are no tactile strips or handrails. Handrails were observed only in the dormitory owned by CF “Your support”.

Only four out of nine dormitories were equipped with ramps. One of them had the space near the ramp occupied by a parked vehicle of one of the residents. Only one dormitory had an electric elevator (Dnipro). The administration of another dormitory stated their intention to install an elevator soon (Lviv).

Another dormitory had an elevator and minor bumps on the way to the elevator, as well as curbs at the front door.

Horizontal communications

While in most cases the hallways had enough free space, some dormitories blocked this space with household items such as clothes dryers, furniture, and refrigerators. People lacked space in their rooms and common areas.

Most of the dormitories are not equipped with handrails. The floor covering is mostly tiled, but only concrete floors were found in one of the dormitories.

Main premises/sleeping areas

All rooms in the dormitories have lighting and running water. Typical flooring is linoleum, tile, carpet, or parquet. Most rooms have a table, chairs, and a sleeping area. In some dormitories, there are additional shelves with bedding, clothes dryers, wardrobes, and cabinets.

Common areas include a toilet, showers, a kitchen, and a corridor.

Toilet

Three out of nine dormitories had accessible toilets. Most toilets had everything needed: sinks, mirrors, and toilet stalls. Several dormitories also had washing machines, boilers, and supplies of industrial water in the toilet.

Meanwhile, the following shortcomings were found during the monitoring: the presence of door steps at the entrance to the toilet, lack of free space on both sides of the door and in front of the toilet, and the absence of handrails near the toilet.

Security issues

Four out of nine dormitories had shelters. However, two dormitories had shelters in another building. Another three dormitories lacked shelters at all. Given the fact that dormitories in Dnipro, which is the closest to the war zone among all the cities monitored, lack shelters, it is the most dangerous city for internally displaced persons. Another point to note is that not all of the inspected shelters are accessible to people with disabilities due to stairs. Moreover, several dormitories have closed shelters, with doors being opened only during air raid alerts, which can also make it difficult to access the shelters in an emergency.

Services

Most of the dormitories offer psychological and legal counseling, as well as social support. One of the dormitories also hosts cultural and educational activities for children and adults, as well as tours (a shelter owned by CF “100% Life” in Lviv). Besides, other NGOs and international organizations provide various services, and their representatives frequently attend the dormitories. According to interviews with staff, residents of all the dormitories are aware of the list of services available to them.

Analyzing responses from residents

Eight out of nine cases reported having lights in and around the shelter at night, as well as a systematic water supply. All respondents share rooms with other people, mostly their relatives, and in some cases with other families. Three out of nine dormitories have no locks on the room doors. All respondents have a separate bed and can prepare their own meals.

When asked about facing gender-related violence in the shelter, none of the respondents reported such experiences. All respondents were also aware of the list of services available in the dormitory. In some cases, they are informed about such services before they move in, when they talk to employees of a charitable foundation, or through information stands.

Only three out of nine respondents mentioned the work of medical staff and the provision of medical care on the territory of the dormitory. Four respondents were unaware of the location of the shelter or could not access it due to its remoteness and inaccessibility. However, five respondents from other dormitories admitted that a person with a disability could reach the shelter independently during an air raid alert.

Analyzing responses from the staff

Employees of all the dormitories interviewed reported power outages in 2022. Therefore, eight of the nine dormitories have generators.

In response to a question about whether the dormitory was prepared for potential blackouts, a representative of only one dormitory in Dnipro stated that it was not. Moreover, this particular dormitory lacked a power generator. Instead, representatives of some dormitories reported not only readiness for potential power outages, but also advance preparation, including the installation of solar panels, purchase of charging stations, firewood, and arrangement of premises to provide emergency power to residents.

All dormitories have a water supply, but only one dormitory (Dnipro) is supplied with potable water, while dormitories in Lviv have water dispensers. Sometimes drinking water has to be brought from other buildings. In most dormitories, cooking is provided in a common kitchen, but there is also a case of centralized catering for all residents (a shelter owned by CF “100% Life” in Lviv).

Not all dormitories give residents the option of locking their room doors. In most cases, a family lives in one room, but there may also be several families and strangers grouped by gender. In six dormitories, there is also an option to separate your sleeping area with a screen.

Responding to the question about cases of gender-related violence in the dormitory, only three employees reported such incidents. Meanwhile, all but one of the dormitories (a shelter owned by CF “Good on Amur” in Dnipro) have an action plan for cases of gender-related violence.

Eight out of nine dormitories have medicines available. Besides, one of the dormitories (owned by CF “100% Life” in Lviv) offers full-time nursing staff and HIV and Covid-19 tests. Another dormitory can provide medical care by its residents with medical education. In five dormitories, the staff or part of the staff also received first aid training.

Finally, when asked about the safety and accessibility of shelters for people with disabilities, four employees reported that shelters were inaccessible to people with disabilities due to stairs or the remoteness of the building with the shelter. However, it should be noted that staff in other dormitories also mentioned the presence of stairs to the shelter, which can pose a real problem for people with disabilities and make it difficult for them to get inside.

4 CRISIS ROOMS AND APARTMENTS FOR GIRLS AND WOMEN BEING VICTIMS OF DOMESTIC AND GENDER-RELATED VIOLENCE

During this study, the FFR team was unable to carry out field research and assess the actual accessibility of services for girls and women with disabilities due to security concerns, as the addresses of the crisis rooms are not public, and unauthorized persons are not allowed to enter. Instead, the team held several semi-structured interviews with experts (only women) employed by NGOs that provide such crisis services and/or cooperate with such crisis centers.

These interviews are aimed at collecting information about the work of crisis rooms and centers, their experience in preparing for a possible war, functioning after a full-scale invasion, and their experience in working with girls and women with disabilities and/or women raising children with disabilities.

Shared concerns about available information:

- The lack of public information on how many girls and women seek aid and require accommodation in a day center, crisis room, shelter, etc. This refers to annualized information on appeals to the hotlines of the national police, free legal aid, and social services, as well as data from services run by local administrations. NGOs have their own data only on the services they provide and do not and should not collect and process data. However, according to the interviewed experts, it is impossible to do effective planning to meet the need for places in crisis rooms and other services without careful collection and generalization of such data.
- The lack of disaggregated information and the inability to distinguish among women seeking assistance specific information about girls and women with disabilities and/or women raising children with disabilities is still very relevant, in particular for planning services accessible to them. There were remarks that “such women do not come back to us” and considerations that “such women will not apply until services become accessible”.
- The lack of public information on the architectural and informational accessibility of temporary housing and related services for girls and women with disabilities and/or women raising children with disabilities. According to the interviewed experts, this may be the reason why girls and women with disabilities (especially women with physical and sensory disabilities) rarely apply for such services.

- The interviewed NGOs try to collect data and consider the concerns of persons with disabilities in the provision of services, taking into account the available resources. One of the key obstacles to accessibility is the issue of cost and time: most of the premises where NGOs provide crisis services are rented.

Matters related to the war's impact:

- Until the start of the full-scale invasion, the respondents had no action plans and protocols in case of war, including emergency response, shelters, evacuation, etc. Such algorithms for the team and recipients of services were developed only after February 24, 2022.
- Likewise, the majority of respondents mention the lack of shelters. This issue was raised after the full-scale invasion, and not all crisis rooms or nearby buildings have the capacity to provide shelters. Given the choice between having a long-term lease and accommodating clients, looking for an affordable room, or a room with a shelter, respondents prefer the first option.
- In the winter of 2022-2023, most respondents who worked directly with crisis housing services indicated the need to consider emergency power outages and adapt conditions in crisis housing, which is difficult to do in rented premises, especially if they are not separate private houses where a power generator can be installed.

Awareness of girls and women about crisis housing services

- The respondents report that over the past few years, the number of women seeking counseling for gender-related violence has increased. This is mainly driven by at least two factors. First, it is associated with many years of awareness-raising activities carried out by many NGOs aimed at reducing the taboo nature of the issue of protecting against domestic and gender-related violence. Second, the direct impact of the war on the increase in the number of cases of not only domestic violence but also specifically cases of sexual violence committed during the war.
- The respondents stressed that they never provided separate information about the accessibility of crisis housing and other services for girls and women with disabilities. All respondents indicated that there were very few clients with visible disabilities, who reported their disability, or who had a child with a disability. The experts have no definite answer as to whether the reason for this is the lack of information specifically for girls and women with disabilities, the

barrier environment, or some other reasons. It was commented that girls and women with psychosocial disabilities find it most difficult to search for accessible services, while service providers have no conditions and skills to work with clients with such disabilities.

Issues of service accessibility: information and architectural accessibility

- The respondents indicate that there is still no common understanding in the public sector that all services and premises of civic organizations should be accessible by default and should meet clear standards. However, they note that they are aware that state and communal service providers must comply with the standard (although this is not always the case in practice). The respondents explain this through several factors: there is no clear obligation, it takes time and resources to change attitudes and raise awareness, and it takes funds to make the often architecturally inaccessible residential and commercial stock in Ukraine accessible (the public sector often lacks these funds).
- NGOs usually struggle to find premises for long-term leases to set up crisis rooms and/or services, so the criteria of architectural accessibility are not the main one in their choice (they also mention the small amount of architecturally accessible housing in general). The unwillingness of owners to provide premises for “dormitories” to NGOs due to stereotypes and the high cost of leased housing is an obstacle to renting.
- Some respondents believe that the availability of online services automatically makes them accessible.
- The respondents report having experience in cooperation with organizations of people with disabilities, mainly in providing consultations on accessible services, such as sign language interpretation or involvement in architectural accessibility checks. They also have experience in integrating information accessibility standards into the development of electronic materials.
- Several respondents have experience in ordering not only individual consultations on various accessibility issues but also specialized training for their teams on how to provide services to girls and women with disabilities. However, they claim that they lack knowledge and skills in working with clients with psychosocial and mental disabilities.

- Each respondent has experience in referring clients for consultations with other service providers, including organizations of persons with disabilities. Regular and occasional partnerships have been referred to, and these partnerships have intensified since the full-scale invasion, which indicates the consolidation of civil society.

Challenges faced by NGOs providing crisis services, including housing:

- Finding premises for long-term lease, growing rental costs, and high cost of premises for purchase.
- Ensuring steady funding for own activities, high dependence on external donors and their priorities.
- Bureaucratic obstacles when trying to register as social service providers to get funded from local budgets; the low quality of the current legal framework regulating the provision of some social services was also noted.
- The matter of the future and sustainable support for girls and women who seek aid. Quite often, apart from crisis housing, psychological, and legal counseling, clients need a wide range of support programs to return to their lives and regain their independence.
- Lack of knowledge about how to provide efficient and extensive services to girls and women with disabilities. Meanwhile, all the respondents confirmed their readiness to learn and, within their own competence, to work in partnership with public organizations of people with disabilities to improve the accessibility of such services.

Conclusions



It is hard to compare different facilities, such as one-story modern modular houses, which are easier to make accessible, with buildings from the old housing stock (like dormitories), which require capital investments to become accessible in the future.

The field stage of the monitoring revealed problems in both the first and second types of housing. It is also worth noting that the staff maintaining different types of temporary housing is unwilling to talk about the living conditions. Every attempt to gain access through official requests, personal contacts, and even unannounced monitoring visits varied from region to region and city to city. It seems that workers do not expect that temporary accommodation places can be visited and inspected not only in terms of the overall quality of services provided there but also with the

specific purpose of assessing their compliance with the current accessibility legislation, for instance.

Most temporary accommodation places located in the old housing stock share common problems:

- Lack of ramps and electric elevators,
- Lack of tactile stripes or other markings for easy orientation,
- Curbs and other obstacles at the entrance and inside the premises,
- Inaccessible and/or unequipped adjacent territory,
- Lack of accessible toilets,
- Remote and inaccessible shelters,
- Insufficient space in rooms for users of mobility aids.

Additionally, despite the large number of public and volunteer initiatives and services that should be regularly provided by local social agencies, few temporary settlements have stands and other information boards where residents can get information about available medical, social, and cultural services in the city, let alone information and digital accessibility.

There is a significant lack of cooperation between communal temporary accommodation facilities and the local public sector, in particular in terms of accessibility and staff training on disability issues.

Obviously, during the field stage of the monitoring, we also sought out positive practices. The following are worth noting:

- There are examples of smart accommodation in inaccessible housing, such as settling people with disabilities and older people on the ground floors, providing auxiliary technical equipment, etc.,
- The issue of winterization for 2023-2024 has become more prominent,
- Employees of temporary accommodation places were trained on specific topics: first aid, prevention and response to domestic violence, etc.,
- The residents were informed about services and opportunities outside of the temporary accommodation places, as well as about the possibility of involving volunteers and community activists in the provision of services on the territory of the town: training events

were held, cultural events and leisure activities for children were arranged on the territory of the towns, and psychological counseling was provided.

Sustainable support and long-term solutions to housing problems are key issues beyond the competence of the administrations of temporary accommodation places and/or the public sector providing such services, as most of those who live in temporary accommodation places for a long time are people who have lost their homes and have nowhere to return to.

- All recovery plans for Ukraine should include programs to develop a new housing policy and create a real social housing stock.
- The housing policy should be based on accessibility standards and existing DBNs: basic architectural accessibility and accessible civil defensive structures should be mandatory for any new residential building or reconstruction.
- Any restrictions on the legal framework and reduced control over accessibility during restoration, reconstruction, construction of new facilities, etc. are absolutely unacceptable.

Recommendations

To the government of Ukraine

- Develop a new housing policy, including the procedure for creating social housing;
- Develop and implement effective mechanisms to control the availability of services and housing, both temporary and newly constructed as part of recovery and reconstruction programs;
- Develop standards and implement mandatory training on accessible service delivery for all state and communal service providers.

To the staff of temporary housing places

- Perform regular assessments of architectural, informational, digital, and other types of accessibility; develop work plans to address deficiencies based on the findings;
- Engage public organizations of people with disabilities in the assessment and development of work plans;
- Implement reasonable accommodation measures whenever possible, and work with local administrations and non-governmental organizations to seek and raise resources to improve accessibility;
- Involve public organizations of people with disabilities in training and awareness-raising activities, including the promotion of a decent attitude towards people with disabilities and the elimination of paternalistic and medical approaches.



ANNEXES

Annex 1.

References

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- 1.2 Temporary housing for IDPs: New conditions and provision procedure. The right to protection <https://r2p.org.ua/page/tymchasove-zhytlo-dlya-vpo-novi-umovy-nadannya>
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- 1.4 Monitoring the accessibility of modular towns for people with disabilities. The League of the Strong 2023 <https://ls.org.ua/monitoryng-dostupnosti-modulnyh-mistechok-dlya-lyudej-z-invalidnistyu/>

Annex 2.

Research tools

- 2.1** Checklist for checking the accessibility of temporary accommodation places – [available here](#)
- 2.2** Questionnaire for the employees of temporary accommodation places for internally displaced persons – [available here](#)
- 2.3** Questionnaire for residents of temporary accommodation places – [available here](#)
- 2.4** Guide to semi-structured interviews with experts on gender-related violence – [available here](#)

Annex 3.

The list of temporary accommodation places for internally displaced persons monitored during the study

3.1 Temporary accommodation places for internally displaced persons in the Dnipropetrovsk region

1. Temporary accommodation place for internally displaced persons owned by the charitable organization “Charitable Foundation “Good on Amur” (Dnipro)
2. Temporary accommodation place for internally displaced persons owned by communal enterprises Zhilservis-5 (Dnipro)
3. Temporary accommodation place for internally displaced persons owned by the Center for long-term accommodation of IDPs “Source of support” (1) (Dnipro)
4. Temporary accommodation place for internally displaced persons owned by the Center for long-term accommodation of IDPs “Source of support” (2) (Dnipro)
5. Temporary accommodation place for internally displaced persons owned by Kairos Center (Dnipro).

3.2 Temporary accommodation places for internally displaced persons in the Kyiv region

1. Modular town in Makariv village
2. Modular town in Irpin
3. Temporary accommodation place for internally displaced persons owned by a resort house in Irpin
4. Temporary accommodation place for internally displaced persons owned by the Depaul Ukraine Charitable Foundation in Kyiv

3.3 Temporary accommodation places for internally displaced persons in the Lviv region

1. Temporary accommodation place for internally displaced persons owned by the charitable foundation “100% Life” (Lviv)
2. Temporary accommodation place for internally displaced persons owned by the Church of the Disciples of Jesus Christ (Lviv)
3. Temporary accommodation place for internally displaced persons owned by the charitable foundation “Your support” (Lviv)