

TRAPPED IN UNCERTAINTY: SYSTEMIC BARRIERS FOR VICTIMS OF UNLAWFUL DEPRIVATION OF PERSONAL LIBERTY

**ANNUAL ANALYTICAL REVIEW OF LEGAL AID FOR
PERSONS UNLAWFULLY DEPRIVED OF PERSONAL LIBERTY
AND THEIR RELATIVES IN 2025**



**ASSOCIATION
OF RELATIVES
of Political Prisoners of
the Kremlin**

**EUROPEAN
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EXECUTIVE SUMMARY

During 2025, the legal service of the Association of Relatives of Political Prisoners of the Kremlin NGO continued its systematic work of providing free legal aid to persons affected by unlawful deprivation of personal liberty as a result of the armed aggression of the Russian Federation, as well as to members of their families. The reporting period demonstrated a further increase in the need for specialised legal support, linked both to the duration of the international armed conflict and to the accumulation of legal consequences for victims after release or during the search for missing persons.

During the reporting period, 562 legal consultations and instances of support were provided, of which 138 were provided directly to affected persons and 417 to members of their families. This confirms the decisive role of families in protecting the rights of persons who are being unlawfully held or have been released. At the same time, 385 persons sought assistance for the first time, while 177 persons required repeated support, indicating the long-term nature of such cases and the need for ongoing legal assistance at different stages.

The largest number of requests concerned establishing the fact of deprivation of personal liberty, locating persons, preparing applications to state authorities, and accessing social protection and state financial assistance. A separate category consisted of complex individual requests related to international protection mechanisms, the documentation of war crimes, and the restoration of the rights of persons

released outside official procedures.

The analysis confirmed that the main barriers for victims remain the complexity of administrative procedures, insufficient coordination between state authorities, the absence of a single support mechanism, and the limited availability of clear information on the exercise and restoration of rights. The significant number of repeated requests indicates that even after receiving an initial consultation, applicants are often forced to seek assistance again due to changes in the circumstances of the case or the ineffectiveness of existing procedures.

The structure of requests also showed that the need for legal aid in this field goes beyond formal consultation. It includes the preparation of procedural documents, interaction with state institutions, support in criminal proceedings, assistance with applications to international mechanisms, and the protection of victims' socio-economic rights. It is precisely a comprehensive approach that enables not only legal support but also the restoration of victims' trust in protection mechanisms.

The report confirms the need for further improvement of state policy in the field of the protection of persons unlawfully deprived of personal liberty, in particular by simplifying restorative procedures, expanding access to legal aid, developing inter-agency coordination, and introducing human-centred approaches to support victims and their families.

METHODOLOGICAL FRAMEWORK FOR THE PROVISION OF LEGAL AID BY THE ARPPK

The Association of Relatives of Political Prisoners of the Kremlin NGO (hereinafter — ARPPK, the Association) was registered in 2017 with the aim of protecting citizens of Ukraine unlawfully deprived of personal liberty as a result of the armed aggression of the Russian Federation, as well as providing systematic support to their families. The Association's activities are aimed not only at responding to individual requests but also at achieving long-term systemic changes in the field of protection of victims' rights.

One of the key areas of ARPPK's work is providing free legal aid, including both initial consultations and comprehensive legal support for victims. The assistance during 2025 shows that beneficiaries' requests are predominantly multi-layered and concern the establishment of the fact of deprivation of personal liberty, access to state support mechanisms, interaction with authorities, as well as the exercise of the right to reparations, primarily access to compensation and rehabilitation. Accordingly, legal aid includes the preparation of applications and appeals, the development of individual action algorithms, support in communication with state bodies, and consultation on international protection mechanisms, including obtaining interim reparations and submitting applications to international registers of damage.

In parallel, the Association carries out systematic work to document war crimes and crimes against humanity committed in the temporarily occupied territories of Ukraine. This area has a dual significance: on the one hand, it contributes to the recording of an evidentiary basis for the subsequent bringing of perpetrators to justice; on the other hand, it strengthens advocacy efforts at the national and international levels by bringing attention to the problem of unlawful deprivation of personal liberty of citizens of Ukraine.

The need for such activity is determined by the scale of the problem. According to the Commissioner for Persons Missing under Special Circumstances, as of 1 February 2026, the Unified Register of Persons Missing under Special Circumstances contained information on more than 90,000 persons (both military personnel and civilians, including children) whose search is ongoing¹. At the same time, the actual figures may be significantly higher, since the occupation structures conceal the fact of holding persons, deny access to international institutions, and do not report their whereabouts. A significant number of released persons had been considered missing until the moment of exchange, indicating systemic opacity on the part of the aggressor state and complicating access to legal protection. Also, in 2025 alone, the Ministry for Communities and Territories Development of Ukraine received 4,757

¹According to letter of the Ministry of Internal Affairs No. 134/29/30-2026 of 24 February 2026 (2353741), in response to an ARPPK request.

applications requesting the establishment of the fact of deprivation of personal liberty as a result of armed aggression against Ukraine and 385 applications requesting recognition of a person as a family member of such persons.²

At the same time, the absence of complete and reliable information on the number of persons held creates legal uncertainty and complicates the planning of state policy for their protection and reintegration.

The conditions in which persons are held in places of detention in the temporarily occupied territories and in the Russian Federation are characterised by systemic human rights violations, including torture, psychological pressure and forced confessions.³ After release, victims face a range of legal and social challenges: from restoring documents and accessing social guarantees to undergoing medical and psychological rehabilitation.⁴ In this context, legal aid is critically important as an instrument for restoring rights and promoting social integration.

The analytical basis of this report was formed on the basis of appeals to the Association's legal service in the period from January 2025 to December 2025. The analysis focuses on the number and nature of requests, as well as the profile of applicants and

their needs. The main recipients of assistance are persons who were unlawfully deprived of personal liberty and their family members, who face difficulties in establishing the relevant status, receiving social payments, and exercising their rights. The legal team provides both consultative support and practical assistance in preparing documents and handling cases.

The Association's institutional capacity is ensured by internal standards for the provision of legal aid. In particular, its activities are regulated by approved standards and procedures that define the principles, stages and quality requirements for legal services. This makes it possible to unify approaches to working with applicants and to ensure an appropriate level of professionalism and effectiveness of the assistance provided.

The effectiveness of legal aid is assessed, among other things, through a feedback mechanism. Based on the results of internal monitoring of the quality of legal aid in 2025, 101 feedback questionnaires received from persons who had contacted the Association's legal service after receiving consultations were analysed. The assessment covered both quantitative indicators and qualitative comments from applicants, enabling a comprehensive analysis not only of the formal level

²According to letter of the Ministry for Communities and Territories Development No. 2526/7/10-26 of 30 January 2026, in response to an ARPPK request.

³For more details, see the ARPPK report "The Human Face of Unlawful Deprivation of Personal Liberty: Review of the Documentation of Russia's War Crimes against Civilians in 2025", available at the link.

⁴For more details on aspects of rehabilitation, see the ARKPP report "After Unlawful Deprivation of Liberty: The Path to Recovery", available at the link.

of satisfaction but also of the practical effectiveness of the support provided. The overwhelming majority of respondents noted that the consultation they received was useful, and the overall positive perception of the services was approximately 95–98%. More than 90% of respondents rated the consultations 5 out of 5, while ratings below 4 were rare. The average quality rating for legal aid was around 4.8–5.0 points, indicating a consistently high level of professionalism, accessibility and practical value of the consultations.

The results confirm that individual support focused on the specific needs of applicants remains one of the key factors in the effectiveness of legal support for persons affected by unlawful deprivation of personal liberty and their family members. At the same time, the results indicate the presence of a number of external and internal factors that may influence the achievement of the final result. Among the external factors, applicants most often mentioned the institutional inefficiency of certain state bodies, lengthy timeframes for consideration of applications, changes in procedures and the complexity of their practical implementation. At the same time, the practice of providing legal aid demonstrates that the effectiveness of rights protection largely depends on the applicants' level of engagement in implementing the recommendations provided. In some cases, after receiving a consultation, applicants did not take the necessary further steps, did not submit the prepared documents, or refused to undergo the procedures required by law. There were also cases of incomplete or incorrectly prepared applications, which complicated the adoption of a positive

decision. In a number of cases, however, a repeated request, revision of documents, or provision of additional evidence made it possible to achieve the necessary result, in particular, the establishment of the fact of deprivation of personal liberty. This indicates that the effectiveness of legal aid depends significantly not only on the quality of legal support, but also on the applicants' willingness to consistently use legal protection mechanisms.

The analysis of feedback also reveals a trend towards repeated requests, driven by the dynamics of the legal and regulatory environment and the emergence of new circumstances in applicants' cases. This confirms that legal aid in this field is long-term, procedural in nature, and not limited to one-time consultations.

A key feature of the Association's approach to providing legal aid is its human-centred, victim-oriented, vulnerability-centred and comprehensive nature. Legal aid goes beyond formal consultation and includes individualised support that takes into account applicants' life circumstances and vulnerability. Practice shows that effectively resolving victims' problems requires a combination of legal tools with social, informational and advocacy support.

The organisation's specialists work according to a full-cycle model: from the initial request to support of the case at various levels, including national and international protection mechanisms. Additional coordination with other human rights organisations is also ensured, thereby expanding the range of available protection tools.

An important element is compliance with ethical standards, in particular the principles of confidentiality, transparency and prevention of conflicts of interest. Communication with service recipients is conducted in accessible language, ensuring a clear understanding of legal procedures, even for persons without specialised training.

Thus, the legal aid provided by the Association

performs a dual function: on the one hand, it is aimed at resolving applicants' specific legal problems; on the other, it serves as an instrument for restoring justice, documenting human rights violations, and laying the groundwork for the subsequent bringing of perpetrators to justice. A comprehensive approach to supporting victims contributes to their reintegration, the restoration of rights, and the strengthening of the protection system at the national and international levels.

PROFILE OF LEGAL AID RECIPIENTS

During the 2025 reporting period, the Association's legal service provided a total of 562 consultations, which significantly exceeded the previous period's indicators and demonstrates both the growing need for legal aid and the level of trust in the organisation. This body of requests enables the formation of a representative profile of aid recipients and the identification of key behavioural and structural patterns in access to legal protection.

The analysis of applicant categories demonstrates the clear predominance of victims' families as the main subjects of appeals. Of the total number of consultations, 417 were provided to family members of persons unlawfully deprived of personal liberty, while 145 consultations were received directly by persons released from unlawful deprivation of personal liberty. This disparity is indicative and reflects the objective inability of a significant number of victims to exercise their right to legal aid independently, in particular due to their detention in places of deprivation of liberty, communication restrictions, or complex post-traumatic conditions after release. Therefore, it is families that serve as the primary representatives of interests, acting as key applicants in interactions with the human rights infrastructure.

The structure of requests by whether they were initial or repeated indicates a combination of two trends: a constant inflow of new applicants and the formation of long-term cases. In particular, 385 persons sought assistance for the first time, while 177 persons sought assistance repeatedly. The share of repeated requests (over 30%) indicates that legal aid in cases

involving unlawful deprivation of personal liberty has a procedural and long-term character. As a rule, the initial request concerns basic issues — establishing the fact of deprivation of liberty or searching for a person — while repeated requests reflect subsequent stages: arranging social assistance, appealing decisions, obtaining compensation, or engaging with international mechanisms. Thus, a stable model of “cascade requests” emerges, in which one case is accompanied by a series of legal actions over time.

The gender distribution of aid recipients shows a significant predominance of women: 357 women and 202 men. This indicator is systemic and correlates with the general structure of social roles in crisis situations: it is women, most often wives, mothers, or daughters of victims, who take responsibility for the search, documentation, and protection of their loved ones' rights. At the same time, men as a category of applicants are represented to a lesser extent, which is linked both to their presence in combat zones, mobilisation or imprisonment, and to a lower level of seeking legal assistance.

The age structure of aid recipients makes it possible to identify the most active social groups. The vast majority are persons aged 35–60 (348 persons), which corresponds to the category of the socially and economically active population that has sufficient capacity to initiate legal processes and at the same time bears responsibility for family members. A significant share is also made up of persons aged 18–35 (156 persons), indicating a gradual increase in the involvement of the younger age group in human rights

activities. By contrast, persons aged 60+ (33 persons) are represented the least, which may indicate barriers to accessing legal aid, in particular digital inequality, procedural complexity, or limited access to information.

The geographical distribution of applicants reflects both the consequences of the armed conflict and the specifics of the population's internal displacement. The largest number of requests was recorded from persons located abroad — 112 cases. This underscores the scale of forced migration and, at the same time, indicates a growing need for remote legal aid adapted to cross-border contexts. Among the regions of Ukraine, the most represented are Kyiv Oblast (91 requests), which is partly explained by the concentration of internally displaced persons and the availability of human rights infrastructure, as well as frontline and de-occupied regions — Kherson (40), Zaporizhzhia (36) and Kharkiv (31) Oblasts. This directly correlates with the intensity of human rights violations in these territories.

Other regions are represented by significantly fewer requests (Lviv — 8, Donetsk and Odesa — 5 each, Chernihiv and Mykolaiv — 4 each, the Autonomous Republic of Crimea — 3, Cherkasy — 2, Ivano-Frankivsk — 1), which may indicate both a lower level of access to legal aid and insufficient awareness of opportunities to receive it. It should be noted separately that some

applicants refused to state their location for security reasons. This is an important indicator of the level of risks faced by victims, especially in cases where their relatives remain in temporarily occupied territories or in places of detention.

Overall, the analysis of the profile of legal aid recipients reveals several key trends. First, the number of requests is increasing, and their nature is becoming more complex, indicating the deepening of systemic problems in access to legal protection. Second, victims' families remain the main agents of interaction with human rights institutions. Third, there is a clear need for long-term support, which transforms legal aid from a one-time service into procedural support. Fourth, the geographical and socio-demographic structure of applicants points to the need for further adaptation of assistance formats, in particular the development of remote services, simplification of procedures, and increased accessibility for vulnerable groups.

Thus, the profile of legal aid recipients presented in this report not only reflects the current state of victims' needs but also outlines directions for further improvement of both the Association's human rights activities and state policy in the field of the protection of persons unlawfully deprived of personal liberty.

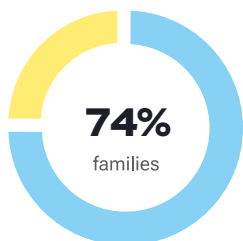
Statistics of requests to the ARPPK legal aid service in 2025

Total consultations

562

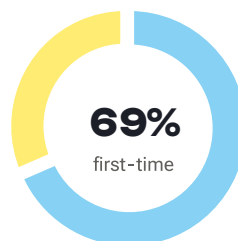
provided by ARPPK's legal service
based on the results of 2025

Who received consultations



- families of persons deprived of liberty
417 · 74%
- directly to persons released from unlawful imprisonment
145 · 26%

First-time vs follow-up requests



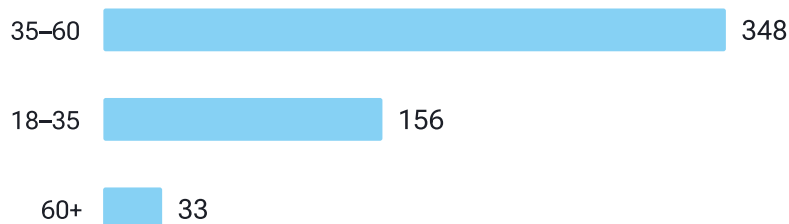
- First-time
385 · 69%
- Follow-up
177 · 31%

Gender



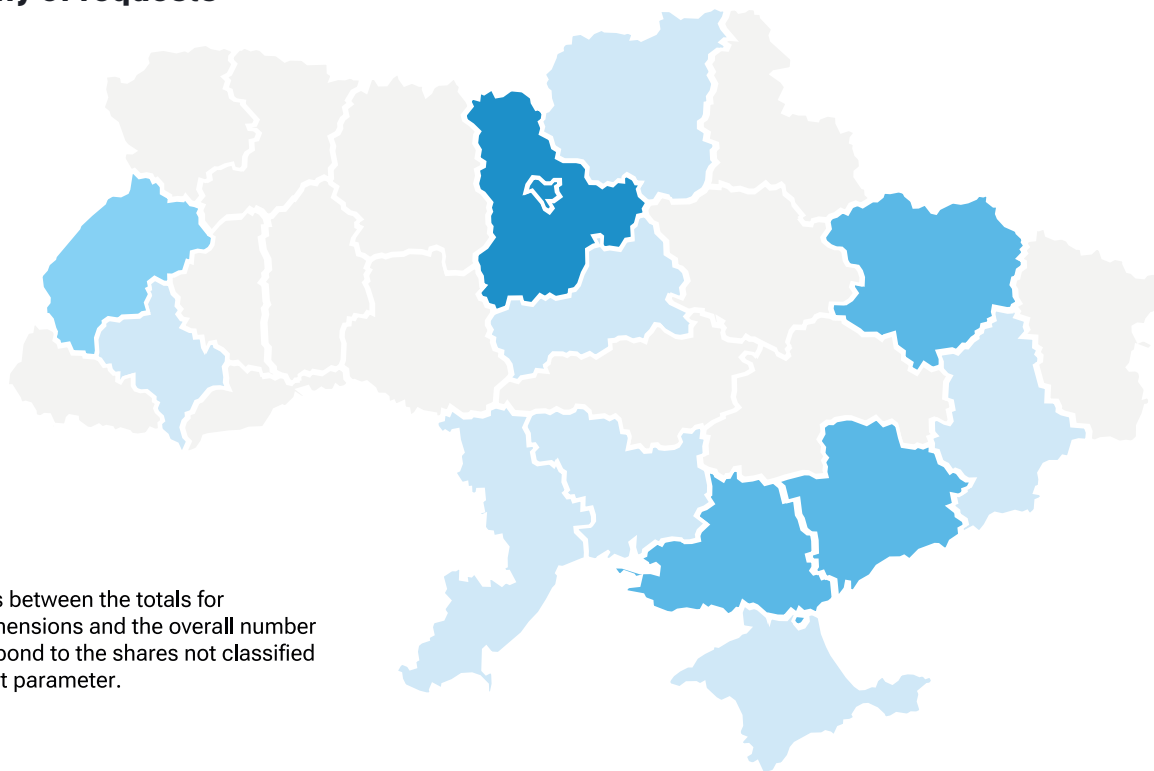
- Women
357 · 64%
- Men
202 · 36%

Age



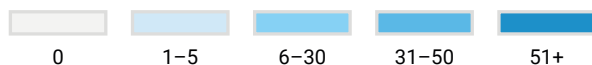
Discrepancies between the totals for individual dimensions and the overall number of 562 correspond to the shares not classified by the relevant parameter.

Geography of requests



Discrepancies between the totals for individual dimensions and the overall number of 562 correspond to the shares not classified by the relevant parameter.

Color intensity



In Ukraine by region

Kyiv region and Kyiv city	91
Kherson region	40
Zaporizhzhia region	36
Kharkiv region	31
Lviv region	8
Donetsk region	5
Odesa region	5
Chernihiv region	4
Mykolaiv region	4
Autonomous Republic of Crimea	3
Cherkasy region	2
Ivano-Frankivsk region	1

Abroad 112

Not identified ~217

Refused to specify 3

ISSUES RAISED IN APPEALS TO THE LEGAL SERVICE: STRUCTURE OF REQUESTS AND SYSTEMIC BARRIERS

The analysis of the content of requests submitted to the Association's legal service in 2025 makes it possible not only to classify the typical legal needs of victims and their families, but also to identify deep structural problems in the functioning of the national protection system. Overall, the recorded structure of requests reflects the complex, multi-level nature of legal challenges arising from the unlawful deprivation of personal liberty in the context of armed conflict.

The most common category of requests in 2025 remains the establishment of the fact of deprivation of personal liberty — 121 cases. This indicates that access to basic legal status is the key “entry barrier” to the further exercise of victims' rights. Without the official recognition of this fact, a person or their family is effectively deprived of the ability to use state support mechanisms, including financial assistance, social guarantees, and access to rehabilitation programmes. The high proportion of such requests also indicates the complexity of the procedure itself, particularly regarding the collection of evidence, interactions with inter-agency commissions, and the ambiguity of administrative practices.

The second-largest group consists of requests related to the preparation of procedural documents: drafting applications and letters concerning unlawful deprivation of personal liberty (74 cases)

and searching for the whereabouts of missing or abducted persons (74 cases). Taken together, these categories reflect a critical lack of clear, accessible information about action algorithms in crisis situations. Applicants often lack basic knowledge of which authorities to contact, in what form to submit documents, and how to coordinate parallel processes — criminal proceedings, administrative procedures, and international applications. This creates a high dependence on legal support even in relatively standard situations.

An additional systemic barrier in this regard remains the insufficient level of information exchange between state authorities and institutions involved in the procedure for establishing the fact of deprivation of personal liberty. Although the Commission includes representatives of certain security and defence sector bodies, as well as the National Information Bureau, the current procedure effectively places the obligation on applicants to independently collect and submit information that is already in the state's possession. In practice, this means submitting separate requests to law enforcement bodies, the NIB, and other authorities for information available about the affected person. Such an approach significantly complicates the procedure, results in a loss of time, and creates an additional administrative burden for families already in a crisis situation.

Practice also demonstrates cases in which the Commission refuses to establish the fact of deprivation of personal liberty due to untimely transmission of information between state authorities or the absence of specific confirmations at the time the application is considered. Separate difficulties also arise in interaction with international organisations. The legislation provides for the possibility of using confirmations from international humanitarian organisations, in particular the International Committee of the Red Cross, but in practice, information in Ukrainian state registers and data from international structures are not always synchronised in time. As a result, situations occur in which Ukrainian authorities already possess information about a person's place of detention, while the corresponding ICRC confirmation is not yet available, or vice versa. At the same time, the current procedure requires that such confirmations be submitted with the application, which creates additional risks of delays in consideration or of negative decisions on formal grounds.

A separate block of requests concerns access to state support mechanisms. In particular, 24 cases concerned receiving state financial assistance, and 10 concerned obtaining extracts from the relevant registers. Despite the existence of a regulatory framework, the practice of its implementation demonstrates significant difficulties: complex procedures, the need to submit numerous documents, delays in the consideration of applications, and the absence of unified approaches across different authorities. As a result, even after a formal status has been established, victims face additional barriers in exercising their rights.

At the same time, the main problem is not the complexity of the procedure for obtaining extracts itself, but the insufficient awareness among victims and their family members of the need for such actions and the practical significance of the relevant documents. In particular, after the fact of deprivation of personal liberty is established, the person must obtain an extract from the Unified Register of Persons in respect of whom the fact of deprivation of personal liberty as a result of armed aggression against Ukraine has been established. Similarly, after submitting information about the enforced disappearance of a family member in temporarily occupied territory, it is possible to obtain an extract from the register of defenders of Ukraine who are held captive by the aggressor state, which may subsequently be used as confirmation of the fact that the person is imprisoned for the purpose of receiving annual state assistance. Thus, in most cases, difficulties arise not because of administrative barriers but because of the lack of accessible information on algorithms for exercising existing rights and on support mechanisms.

A significant number of requests concern criminal-law protection and the procedural status of victims. In particular, 10 cases of preparing petitions and applications to investigative authorities were recorded in which the applicant acted as a victim. This indicates the need for support not only in administrative but also in criminal proceedings, which are often complex, lengthy, and require the applicant's active participation to ensure an effective investigation.

At the same time, a separate segment of

requests concerns release (exchange) issues. In particular, 14 requests concerned the preparation of documents for Ukrainian state institutions regarding the inclusion of persons on exchange lists, and another 8 concerned the direct inclusion of persons on such lists. This demonstrates the high level of expectations among families regarding the possibility of influencing exchange processes, which nevertheless remain largely opaque and dependent on political and diplomatic factors. The absence of clear criteria and communication procedures on the part of the state creates additional tension and uncertainty for applicants.

A special category consists of requests related to the cross-border dimension of rights protection. Thus, 15 cases concerned the preparation of appeals to Russian law enforcement agencies with the aim of searching for missing or abducted persons in temporarily occupied territories. The very fact of such appeals indicates the absence of effective international mechanisms for accessing information about persons being held, thereby forcing families to resort to complex and often ineffective channels of communication.

A number of requests reflect specific legal situations arising from non-standard circumstances. In particular, 5 cases concerned actions by persons released from unlawful imprisonment outside official exchange procedures, 4 concerned the mobilisation of persons with an established fact of deprivation of liberty, and 3 concerned the submission of applications to the International Register of Damage for Ukraine. Isolated requests also concerned the recording of war crimes (1 case)

and the determination of the status of a person affected by trafficking in human beings (1 case). Although these categories are quantitatively small, they demonstrate the breadth of legal challenges and the need for flexible, individualised approaches to resolving them.

The most indicative category is “other”, which covers 194 requests — effectively one third of all requests. Its content is extremely diverse and includes both procedural issues (registration in the Coordination Headquarters’ personal account, obtaining extracts, preparing appeals to authorities) and complex cases related to international mechanisms (appeals to UN working groups, interaction with diplomatic institutions, issues of the return of persons after release). A significant share of these requests concerns individualised situations that do not fall under standard algorithms, which in turn indicates the fragmentation of existing problems and the absence of universal solutions for victims. In particular, victims directly described the problems and barriers they constantly faced as follows:

“From the first days after my husband’s abduction, we have been cooperating with human rights organisations. We contacted others, too; we were looking specifically for empathetic and persistent people who would not wait for us to plead, but would act. I agree that there can never be too much help in legal matters. Therefore, please provide the specialists of your organisation with this link: it contains information about the problems my family has faced; perhaps they have experience in overcoming the bureaucracy and indifference

of the relevant structures in Ukraine ...”

“I am a civilian; in 2022, I was held captive as a result of the armed aggression of the Russian Federation. The police registered a case under Article 438. Four other people are involved in the case together with me... In 2024, I received a refusal from the NIB commission with the wording ‘insufficient evidence’. At present, I need help proving my status...”

“In the city of Enerhodar, Zaporizhzhia Oblast, my sister was detained by the special services of the Russian Federation... Throughout the entire period of her detention in the pre-trial detention centre, investigative actions and investigative experiments are being conducted, and her captivity is being prolonged. My sister is accused of organising terrorist activity, manufacturing explosives and treason against the motherland... Taking into account the circumstances set out above, I ask for assistance in interacting with state authorities regarding her inclusion in the state registers of Ukraine for her release and return to the territory controlled by Ukraine...”

“I am asking you for help in searching for my husband. He was held captive in the temporarily occupied territory ... he was released without explanation, prohibited from leaving, obliged to obtain a passport, find employment, and report for some time. He was there at his place of registration. He was constantly in contact with us. Then he disappeared again. He did not show up for work. He is not at home. But his phone is periodically on the network, SMS messages are

delivered, but it is impossible to get through. His mother tried to find him, went to the police, but they constantly refused her; they never accepted the statement. There were always some excuses (either they had no electricity, or “go and look among friends”...). We all hoped and waited; maybe he had been taken for some kind of checks (because there were such cases with others from 7 days to 3 months). But there is silence, no one has contacted us. So we no longer have the strength to wait; I again contacted the police, and the statement with materials will be transferred to the SBU in the case of my husband’s abduction... I am now asking you for help, please, perhaps something has changed since 2022, and you can somehow help...”

“...This happened because first the house was destroyed, and all personal documents burned with it, including the passport, birth certificate and other documents confirming identity. Only a photocopy of the passport and a photo of the taxpayer registration number from Diia remained... On Monday, there was a five-minute court hearing, where she was convicted of posing a threat to the Russian Federation and sentenced to administrative expulsion. At this place, they require a certificate identifying her for return to Ukraine so that she can be rescued; my mother’s brother will go to the State Migration Service of Ukraine for such a certificate. I hope the certificate will be prepared, and then I will look for ways to deliver it... My mother cannot access Diia because her PrivatBank cards were burned along with the documents. When trying to restore access, a photo of the original

passport or bank card is required, but only a photocopy of the passport has survived. I would be very grateful for any help, information, legal or otherwise; perhaps there is something else that needs to be obtained or done to get her out of there. I am attaching the documents I have..."

Summarising, the structure of requests makes it possible to identify several key systemic problems. First, the absence of a simple, accessible mechanism for establishing legal status is the primary barrier to exercising rights. Second, there is fragmentation of state procedures and a lack of coordination between institutions, forcing applicants to navigate a complex system independently. Third, there is significant dependence on individual legal support

even in typical cases, indicating a low level of institutional capacity of the state system. Fourth, the international dimension of the problem remains insufficiently regulated, limiting the possibilities for effective protection of persons located outside government-controlled territory.

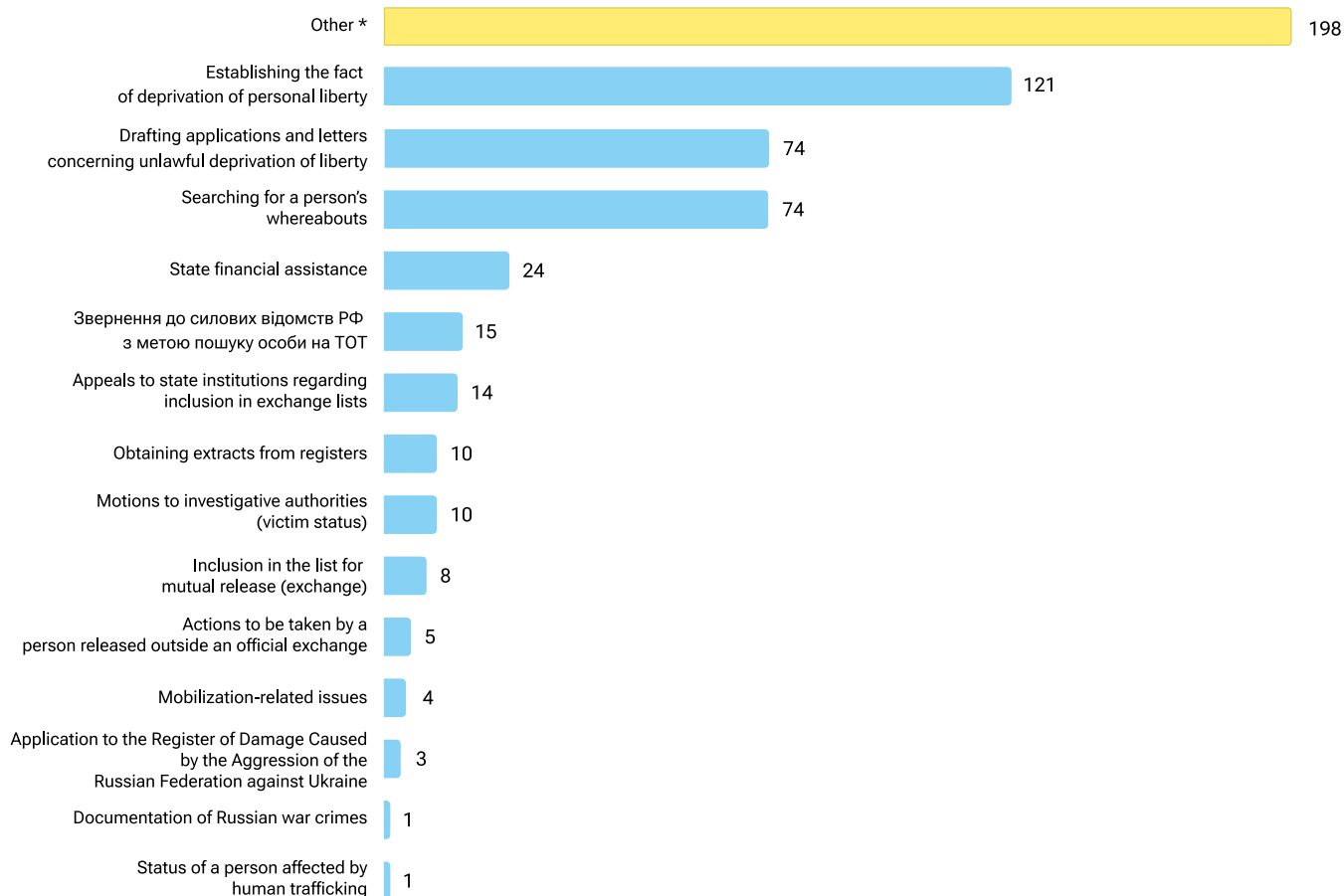
Thus, the issues raised in the requests reflect not only the individual difficulties of applicants but also systemic dysfunctions in state policy concerning persons unlawfully deprived of personal liberty. Overcoming them requires comprehensive solutions that simplify procedures, increase transparency, strengthen inter-agency coordination, and integrate national and international protection mechanisms.

Topics of requests to the legal service

Total consultations

562

■ Thematic categories ■ Other (varied requests)



* The "Other" category covers both procedural issues – such as registration in the personal account of the Coordination Headquarters, obtaining extracts, and preparing appeals to public authorities – and complex cases involving international mechanisms, including submissions to UN working groups, engagement with diplomatic institutions, and issues related to the return of persons after release.

CONCLUSIONS

The results of 2025 indicate that the problem of unlawful deprivation of personal liberty as a result of Russian aggression continues to be systemic in nature and is accompanied by long-term legal, social and humanitarian consequences for victims and their families. The increase in requests to the Association's legal service demonstrates not only the scale of the problem but also the growing need for professional legal support amid a complex and fragmented state response system.

The analysis confirmed that the greatest difficulties arise at the initial stage of exercising rights: during the establishment of the fact of deprivation of personal liberty, the search for missing persons, and access to state support mechanisms. These stages place the greatest burden on applicants and create additional risks of re-traumatisation. The presence of a significant number of repeated requests indicates that existing protection mechanisms remain insufficiently effective without ongoing legal support.

The socio-demographic profile of aid recipients confirms that the primary burden of protecting victims' rights falls on family members, mainly middle-aged women, who serve as the primary applicants in interactions with state authorities. This indicates the need to form a support policy not only for the victims themselves, but also for members of their families, who effectively perform the function of long-term representation of the interests of their loved ones.

At the same time, the practice of legal aid has shown that a significant share of problems is not individual but structural. Among the main challenges remain the absence of unified procedures, insufficient inter-agency coordination, lack of accessible information, and the limited integration of national and international protection mechanisms. This indicates the need to move from reacting to individual cases to forming a coherent state support system for persons affected by unlawful detention.

The Association's experience during the reporting period confirmed that effective protection of the rights of this category of persons is possible only through a combination of individual legal support, systemic advocacy, documentation of human rights violations, and consistent interaction with state institutions. It is precisely such a comprehensive approach that makes it possible not only to respond to current requests but also to create the preconditions for long-term changes in the field of protection of victims' rights.

Looking ahead, the key task remains strengthening the state's capacity to ensure timely, accessible, and effective protection of persons unlawfully deprived of personal liberty, as well as creating conditions for their full recovery after what they have endured. The implementation of the recommendations outlined in the report should be an important step toward building a more consistent and human-centred system for protecting victims' rights in Ukraine.

RECOMMENDATION BRIEF FOR PERSONS WHO WERE UNLAWFULLY DEPRIVED OF PERSONAL LIBERTY AS A RESULT OF RUSSIAN AGGRESSION AND FOR RELATIVES OF SUCH PERSONS

Unlawful deprivation of personal liberty as a result of the armed aggression of the Russian Federation is an international crime that requires proper documentation, legal support and timely response. Persons who have survived unlawful detention, as well as members of their families after release or during the search for loved ones, often face legal uncertainty, complex procedures, and a lack of reliable information on protection mechanisms. The practice of legal support shows that the effectiveness of further protection largely depends on the timeliness of actions and the correctness of the preparation of initial applications.

Of primary importance is the preservation of all documents and materials that may confirm the fact of unlawful deprivation of liberty. Such materials include court decisions, certificates, official responses from state authorities, medical documents, witness statements, photo and video materials, correspondence or other information that may confirm the circumstances of detention. In the absence of official documents, it is important to independently record all available information about the date, place, conditions of detention and persons who can confirm the circumstances of the event. It is the completeness of the collected data that may subsequently be decisive for establishing legal status.

All appeals to state authorities should be submitted exclusively in writing through official communication channels. This enables confirmation of the application's submission and subsequent tracking of its consideration. In cases of inaction or formal refusals, it is recommended to keep copies of all submitted documents and responses, as they may be needed for further appeals or applications to other authorities.

Establishing the official fact of deprivation of personal liberty is a key prerequisite for access to state support. To do this, it is necessary to submit an application to the Commission on Establishing the Fact of Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine and to obtain an extract from the relevant state register. The existence of such a decision makes it possible to obtain social protection, financial assistance, medical and psychological support, as well as other guarantees provided for by law.

In cases where a person was released independently, outside official exchange procedures, it is especially important to document the fact of unlawful detention as soon as possible. In such situations, the circumstances of detention must be confirmed separately, as this category of cases often poses the greatest difficulties for state

authorities.

Relatives of persons who remain in unlawful detention or are considered missing are advised to submit information as soon as possible to the Coordination Headquarters for the Treatment of Prisoners of War, the National Information Bureau, law enforcement authorities, and international protection mechanisms. It is important to regularly update the submitted information and report any new circumstances that may help establish the person's whereabouts.

To exercise the right to social protection, it is advisable to check in a timely manner the possibility of receiving state financial assistance provided for by legislation, as well as the availability of international support programmes. Practice shows that many victims do not use the available mechanisms solely due to insufficient awareness or the complexity of the procedures. In such cases, legal consultation helps avoid mistakes and shorten the time required to receive assistance.

Free legal aid should be obtained at an early stage. Contacting specialised human rights organisations or lawyers at the initial stage of a case enables the development of the correct legal strategy, avoids delays and minimises the risk of refusals due to procedural errors. This is especially important in cases where simultaneous interaction with multiple state institutions or international bodies is required.

If the circumstances of the case require additional

international response, it is advisable to consider applying to international human rights organisations and institutions. This includes, in particular, United Nations structures, international monitoring missions and other mechanisms for documenting human rights violations. Such mechanisms have a separate international mandate that differs from the functions of national authorities and may contribute to international documentation of violations, increased attention to a specific case, and additional international pressure to respect victims' rights. A properly prepared international application may also serve as an important element in documenting violations within international accountability mechanisms.

For persons located outside Ukraine, interaction with Ukrainian diplomatic institutions is of particular importance. Through consular institutions, it is possible to restore documents, confirm citizenship, and obtain basic information about further legal actions. In such cases, remote legal support is often the only available means of protection.

Separate attention should be paid to psychological support and rehabilitation. The consequences of unlawful detention often have a long-term impact on a person's physical and psycho-emotional state; therefore, legal protection must be combined with access to medical, psychological and social assistance. The restoration of victims' rights is impossible without their further social integration.

Compliance with these recommendations will facilitate more effective access to legal aid,

proper documentation of violations and stronger protection of the rights of persons affected by unlawful deprivation of personal liberty, as well as members of their families.

RECOMMENDATIONS TO STATE AUTHORITIES AND LOCAL SELF-GOVERNMENT BODIES ON STRENGTHENING ACCESS TO LEGAL AID FOR VICTIMS OF UNLAWFUL DEPRIVATION OF PERSONAL LIBERTY

The analysis of requests received by the Association's legal service during the reporting period indicates a number of systemic gaps in state response mechanisms for cases of unlawful deprivation of personal liberty resulting from the armed aggression of the Russian Federation. Despite the gradual formation of a regulatory framework in this field, victims' and their families' access to legal aid and the guarantees provided by law remain complicated due to complex procedures, insufficient coordination between institutions and uneven practice in the application of legislation. In this regard, strengthening the institutional capacity of authorities and improving administrative support mechanisms are particularly relevant.

The primary task should be to simplify the procedure for applicants to establish the fact of deprivation of personal liberty. Practice shows that this stage is the main barrier to the further exercise of victims' rights. It is advisable to review the current procedure for the consideration of applications to reduce processing timeframes, unify evidentiary requirements, and introduce a clearer mechanism to inform applicants of the progress of consideration. An important step should also be the creation of a single information

algorithm for persons who first encounter the need to undergo this procedure.

Separate attention should be paid to strengthening inter-agency coordination among state bodies responsible for the search, documentation, social protection, and legal support for victims. At present, families are forced to interact independently with numerous institutions, including law enforcement bodies, the Ministry for Communities and Territories Development of Ukraine, the Coordination Headquarters, social protection bodies and diplomatic institutions. The absence of a single support mechanism leads to functional duplication, inconsistent decisions, and an additional psychological burden on applicants. In this context, it is advisable to introduce the "single window" principle for supporting such categories of cases.

A significant problem also remains the Commission's practice of making decisions without proper communication with applicants regarding the reasons for refusing to establish the fact of deprivation of personal liberty. In many cases, applicants do not receive sufficiently reasoned explanations of exactly what evidence or documents are lacking for a positive decision. This complicates the possibility of remedying

shortcomings and resubmitting an application, and also heightens legal uncertainty and distrust in the procedure. The practice of legal support shows that after applications are revised, circumstances of the case are clarified, or specific evidence is added, a significant proportion of repeated applications result in the establishment of the relevant fact. This indicates the need for a more transparent and communicative model of the Commission's work.

It is necessary to overcome the problem of insufficient communication between the Ministry for Communities and Territories Development, other relevant ministries and applicants during administrative procedures. Victims and members of their families often have no opportunity to receive timely information about the status of applications, reasons for delays or further necessary actions. The absence of proper feedback effectively shifts the role of informing applicants to civil society organisations and lawyers, even though it is state authorities that should ensure the accessibility and clarity of administrative procedures.

It also remains necessary to ensure stable access to free legal aid. State authorities should strengthen cooperation with the free legal aid system and specialised civil society organisations with practical experience in supporting such cases. This will make it possible to provide not only formal consultation but also comprehensive support for victims, including assistance with preparing documents, representation of interests, and support with complex inter-agency procedures.

At the same time, the current model for involving civil society organisations in the Commission's work urgently needs improvement. Practice indicates insufficient rotation in the representation of the civil society sector, as well as the absence of clearly defined obligations regarding communication with applicants and provision of systematic feedback to them. As a result, the participation of civil society organisations in the work of certain mechanisms does not always translate into real strengthening of support for victims. It is advisable to expand the participation of specialised human rights organisations, adopt more open approaches to forming the composition of consultative bodies, and establish clear standards for interaction with applicants.

The mechanism for informing victims and their family members requires particular improvement. A significant share of requests arises from a lack of accessible information on the order of actions, available guarantees, and the competence of individual authorities. In this regard, authorities should develop unified informational materials that contain step-by-step action algorithms for different categories of applicants. Such materials should be available both in digital format and through administrative service centres, social services and diplomatic missions.

A separate area for improvement concerns the digitalisation of procedures. A significant number of applicants are located outside Ukraine or in remote regions, which complicates personal access to state institutions. In this regard, it is necessary to expand electronic services for

submitting applications, obtaining extracts from registers, tracking the status of case consideration and remote communication with authorised bodies. Digital mechanisms should not replace personal support, but complement it, ensuring accessibility for different categories of victims.

The issue of training specialists who work with this category of applicants remains important. Practice shows that employees of state institutions do not always possess specialised knowledge regarding the legal status of persons unlawfully deprived of liberty and the specifics of working with people who have experienced trauma. In this regard, it is advisable to conduct regular training for employees of the social sector, free legal aid centres, law enforcement bodies and local self-government bodies on standards of sensitive communication and the specifics of supporting such cases.

Local self-government bodies are recommended to more actively integrate support for victims into local social protection programmes. In practice, it is at the local level that people most often face issues with housing, document restoration, access to medical services, and psychological support. Including this category in local assistance programmes will reduce the burden on central authorities and increase the accessibility of services for victims.

No less important is the improvement of mechanisms for collecting and exchanging information between state structures. Some requests concern the fact that relatives do not receive timely information about the progress of

the search or the status of the case. It is advisable to introduce clear standards for informing applicants and to designate responsible persons for communication support in each specific case. This will help increase trust in state institutions and reduce repeated requests on the same issues.

Separate attention should be paid to the interaction of state authorities with international human rights protection mechanisms. In many cases, effective protection of victims' rights requires the use of international documentation and response tools. Therefore, authorities should ensure more systematic support for applicants in preparing applications to international institutions and strengthen coordination with international organisations dealing with enforced disappearances, unlawful detention and war crimes.

Thus, increasing the effectiveness of restoring the rights of persons affected by unlawful deprivation of personal liberty requires not only improvements in individual administrative procedures but also the development of a coherent state policy oriented toward the needs, dignity, and rights of the person. Implementation of these recommendations will contribute to strengthening the system of protection for victims, increasing trust in state institutions and ensuring more effective restoration of violated rights.

In view of this, it is recommended:

1. TO THE VERKHOVNA RADA OF UKRAINE

Expand the circle of persons covered by Law No.

2010-IX by adopting Draft Law on Amendments to Certain Legislative Acts of Ukraine concerning the Regulation and Exercise by Persons in respect of whom the Fact of Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine has been Established, and by Their Close Relatives, of Their Rights and Guarantees No. 14383 of 14 January 2026.⁵

2. TO THE CABINET OF MINISTERS OF UKRAINE

- 1. Adopt as a basis the framework state programme for the recovery, rehabilitation and reintegration of released civilians unlawfully deprived of liberty as a result of armed aggression against Ukraine for 2026–2030.**
- 2. Create a specialised executive authority – the State Agency for Civilian Persons Affected by Unlawful Deprivation of Personal Liberty as a Result of the Armed Aggression of the Russian Federation – which would ensure a unified state policy in this field. Such a body could conduct centralised registration of victims and missing persons, support their families, coordinate measures to facilitate release, implement mechanisms of social and legal protection provided for by legislation, and ensure comprehensive support for persons**

after release, including medical, psychological and legal assistance. The creation of a separate institution would eliminate fragmentation in the existing response and establish a permanent state mechanism to support civilian victims.

- 3. Introduce a separate state fund (or a mixed fund – state with international participation) to support victims of torture and other cruel, inhuman or degrading treatment, by analogy with practices applied in other states and post-conflict contexts. Such a fund should function as a targeted instrument for financing the medical, psychological and social rehabilitation of persons who have suffered torture, regardless of the stage of criminal proceedings or the completion of status procedures.**
- 4. Ensure review and clarification of by-law procedures related to the establishment of the fact of deprivation of personal liberty, in order to reduce the evidentiary burden on applicants in cases of incommunicado detention and unofficial places of detention. It is advisable to introduce clearer, unified criteria for assessing materials and mandatory standards for the reasoning of Commission decisions.⁶**
- 5. Strengthen inter-agency coordination in**

⁵Verkhovna Rada of Ukraine, Draft Law on Amendments to Certain Legislative Acts of Ukraine concerning the Regulation and Exercise by Persons in respect of whom the Fact of Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine has been Established, and by Their Close Relatives, of Their Rights and Guarantees, <https://itd.rada.gov.ua/billinfo/Bills/Card/59476>

⁶Such criteria and guidelines are recommended to be implemented from the expert analytical review by the NGO “Association of Relatives of Kremlin Political Prisoners” on the practice of the Commission and procedures for establishing the fact of deprivation of personal liberty, URL: <https://www.relativespp.org/analytic/analytichnyy-zvit-ge>.

implementing the Procedure for post-isolation and reintegration measures by designating a body responsible for the overall routing of assistance and monitoring its continuity.

3. TO THE MINISTRY OF FOREIGN AFFAIRS OF UKRAINE

1. Intensify diplomatic efforts to introduce the mechanism of a Protecting Power.

It is advisable to initiate negotiations with neutral states on the possibility of their performing the functions of a Protecting Power with regard to citizens of Ukraine unlawfully held by the aggressor state. At the same time, it is necessary to strengthen international diplomatic pressure in order to secure the consent of the detaining state to the application of this mechanism in accordance with the provisions of the Geneva Conventions.

2. Strengthen cooperation with the International Committee of the Red Cross.

In cases where the mechanism of a Protecting Power remains unavailable, the ICRC may perform certain protective functions. In this regard, it is important to expand interaction with the organisation to ensure regular access of its representatives to places where citizens of Ukraine are held, monitoring of their conditions of detention, and recording of violations of international humanitarian law.

4. TO THE MINISTRY FOR COMMUNITIES AND TERRITORIES DEVELOPMENT OF UKRAINE

1. Initiate expansion of the circle of persons entitled to rehabilitation support.

It is necessary to improve the regulatory framework so that the right to medical, psychological and social rehabilitation is recognised not only by released persons but also by members of their families, who also experience the long-term consequences of the unlawful deprivation of a loved one's liberty.

2. Introduce the "single window" principle for victims.

It is advisable to create a centralised mechanism through which an affected person or a member of their family could receive legal, social, psychological and administrative assistance without having to contact numerous institutions. This would reduce the bureaucratic burden and increase the effectiveness of support.

3. Improve the procedure for establishing the fact of deprivation of personal liberty.

It is necessary to ensure clear criteria, uniform practice in the consideration of applications, and accessible information for applicants on the required documents, timeframes for consideration, and the Commission's decision-making procedure. It is advisable to improve the practice of considering applications by ensuring transparency, predictability and sensitivity to the specific nature of experienced unlawful detention, in particular in cases of torture and psychological trauma. It is necessary to develop internal methodological recommendations for assessing different types of evidence and for

working with incomplete or indirect materials.⁷

4. Strengthen social guarantees for family members of victims.

It is advisable to review the list of benefits for victims' families, providing additional support mechanisms, including the possibility of receiving housing subsidies and targeted assistance during unlawful detention of a family member.

5. TO THE MINISTRY OF HEALTH OF UKRAINE AND THE NATIONAL HEALTH SERVICE OF UKRAINE

1. Ensure access to comprehensive medical and psychological assistance.

It is necessary to create an effective mechanism for providing medical, psychiatric, psychological and rehabilitation assistance to persons who have survived unlawful detention, taking into account the consequences of torture, prolonged isolation and other forms of ill-treatment.

2. Develop specialised treatment and rehabilitation programmes for persons released from places of unlawful detention. Such programmes should cover the treatment of chronic diseases and complications, including cardiovascular and renal pathologies, the consequences of prolonged starvation (anorexia, critical weight deficit), as well as dental harm.

3. Ensure the development and implementation of targeted training programmes for primary-care doctors (family doctors, general practitioners), who perform the function of primary routing of patients in the health-care system, regarding the specific medical needs of released civilian persons who have experienced unlawful deprivation of personal liberty.

4. Provide for the training of specialised professionals to conduct stabilisation support programmes for released civilians according to a model close to the existing decompression and post-isolation support programmes for military personnel, adapted to the specific experience of deprivation of personal liberty of civilian persons.

5. Introduce a system of professional verification of private mental health specialists who can work with the consequences of torture and incommunicado detention, with the subsequent formation of a mechanism for referral to them after completion of state programmes in cases where long-term therapeutic work is needed, and create organisational and financial conditions for their involvement.

6. Ensure institutional coordination and clear routing protocols between the state and non-state sectors in order to provide continuous, interdisciplinary psychosocial support that takes into account the possible long-term need for support.

⁷Such criteria and guidelines are recommended to be implemented from the expert analytical review by the NGO "Association of Relatives of Kremlin Political Prisoners" on the practice of the Commission and procedures for establishing the fact of deprivation of personal liberty, URL: <https://www.relativespp.org/analytic/analytichnyy-zvit-ge>.

7. **Develop and implement psychosocial support programmes for families of released civilians**, including measures aimed at restoring family interaction and preventing secondary traumatisation.

6. TO THE MINISTRY OF SOCIAL POLICY OF UKRAINE AND LOCAL SELF-GOVERNMENT BODIES

1. **Integrate persons released from unlawful detention into the case-management system of social services as a separate vulnerable category** with guaranteed access to individual needs assessment and support. Ensure practical consistency between the status guarantees in Law No. 2010-IX and the actual social service infrastructure at the community level.
2. **Provide for local support programmes for victims.**

It is recommended to include persons who have survived unlawful deprivation of liberty and their families in local social protection programmes, particularly regarding material support, access to medical services, and social support.

3. **Facilitate the formation of temporary housing funds.**

Local authorities should provide for temporary accommodation for released persons who, upon return, have no safe place to live or require urgent adaptation.

4. **Ensure the accessibility of services at the local level.**

It is necessary to strengthen coordination among social services, medical institutions, and free legal aid centres to ensure an operational response to victims' needs without additional administrative barriers.

INSTITUTIONAL AND PROJECT SUPPORT FOR THE ARKPP LEGAL AID SERVICE

The provision of legal consultations in 2025 was made possible by the institutional and project support from international and national partners, whose cooperation ensured the continuity of legal support for victims and their families. With support provided by People in Need, 178 consultations were delivered, primarily aimed at initial legal aid and individual support to applicants. With the support of the East Europe Foundation, 169 consultations were provided, covering issues of social protection, documentation of violations, and access to state

support mechanisms. The largest volume of assistance — 215 consultations — was provided with the support of ISAR Ednannia, which enabled expanded access to legal aid for applicants from different regions of Ukraine and those abroad. Collectively, this partner support created the financial and organisational preconditions for providing all 562 legal consultations, confirming the importance of sustainable donor engagement in ensuring systematic support to persons affected by unlawful deprivation of personal liberty.



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