

Shadow Report

on the Study of Invisible Veteran Policy
for 2014-2022

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The main text of the Shadow Report was written by analysts from the Agency for Legislative Initiatives, based on the results of their research.

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List of Abbreviations

ACU – Accounting Chamber of Ukraine

AFU – Armed Forces of Ukraine

ALI – Agency for Legislative Initiatives

ATO – Anti-terrorist operation

CCU – Constitutional Court of Ukraine

CDK – Code of Departmental Classification of Budget Expenditures and Crediting (primary budget funds administrator)

CEB – Central executive body

CMB – Combatant (participant in combat operations)

CMU – Cabinet of Ministers of Ukraine

CPCE – Code for Programme Classification of Budget Expenditures

CPCEL – Code for the Programme Classification of Budget Expenditures and Credits

CPLR – Centre of Policy and Legal Reform

IBRD – International Bank for Reconstruction and Development

ITA – International Technical Assistance

JFO – Joint Forces Operation

MCIP – Ministry of Culture and Information Policy

MCYS – Ministry of Culture, Youth and Sports

Media – Mass media

Ministry of Social Policy – Ministry of Social Policy of Ukraine

Ministry of Veterans, Ministry – Ministry of Veterans Affairs of Ukraine

MLD – Main Legal Department of the Verkhovna Rada of Ukraine

MSED – Main Scientific and Expert Department of the Verkhovna Rada of Ukraine

NGO – Non-governmental organisation

NLA – Normative legal act

NSDC – National Security and Defense Council of Ukraine

Programme, Rehabilitation Programme – State Target Programme for the Physical, Medical, and Psychological Rehabilitation, as well as Social and Professional Readaptation, of Participants in the Anti-Terrorist Operation and Individuals Involved in Measures to Ensure National Security and Defence, Repelling and Deterring Armed Aggression by the Russian Federation in the Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022.

LIST OF ABBREVIATIONS

RSA – Regional state administration

SES – State Emergency Service of Ukraine

State Service – State Service of Ukraine for War Veterans and Participants of the Anti-Terrorist Operation

TIC – Temporary Investigation Commission of the Verkhovna Rada of Ukraine

TSC – Temporary Special Commission of the Verkhovna Rada of Ukraine

USA – United States of America

VAT – Value added tax

VRU – Verkhovna Rada of Ukraine

Introduction

Veteran policy in Ukraine, like many other aspects of the functioning of the government machinery, is far from perfect. This imperfection has become especially evident during the new phase of the Russian-Ukrainian war, as veteran issues have clearly extended beyond the ATO/JFO and have reached, or are expected to reach, nearly every Ukrainian family. Since the beginning of this new phase, changes in veteran policy have begun to accelerate. The obvious reason for this acceleration is the radical, indeed, full-scale change of context. However, has the internal logic of developing veteran policy changed? Have the mechanisms and procedures through which society, political forces and other actors influence regulation of veteran policy changed? Has the process by which an idea evolves from inception to implementation and the evaluation of its success and effectiveness changed?

Doubts about the affirmative answer to these questions inevitably lead to additional questions. Will a change in context [without a significant change in the policymaking logic] allow for the development of a veteran policies that can meaningfully address the problems of veterans? If the changed context is a window of opportunity for systemic changes, how long will this window remain open? How can we prepare for the change in context and for further challenges in veteran policy that will come with the new context? All these questions should lead to a reflection on the chronic importance of the policymaking system.

This study focuses on examining the experience of veteran policymaking in 2014-2022 with a clear focus on the question, “Why did it happen this way?” at all stages of the policy cycle. It is not about the problems of veterans per se, but about the problems within veteran policy, that prevent the resolution of veterans’ problems. Studying this experience allows us to predict future challenges and obstacles to veteran policy and identify systemic problems of policymaking in general.

This introduction was written in the autumn of 2024, following yet another change of the Minister of Veterans, after the President of Ukraine’s promises regarding a “policy of heroes” and after the initial failures in implementing the “veteran assistant” institution. In the autumn of 2024, veteran policy is well supported by promises and has already undergone some meaningful changes. While this is surprisingly reminiscent of the situation a decade ago, when the modern veteran policy in Ukraine was just beginning to take shape. Therefore, analysing the experience of 2014-2022 seems extremely important for veteran policy from 2024 to 2032.

The study is quite extensive, so for ease of reading it can be divided into three levels:

- ▶ A several-page summary of the overall findings, conclusions and recommendations.
- ▶ Chapter 8 entitled “Why Did We Fail to Develop a Qualitatively New Veteran Policy and What Can Be Done About it?” contains the main narrative of the study, which summarises the research findings.
- ▶ The full text of the study with comprehensive facts and detailed analysis.

Summary

The purpose of this study is to answer the question: **“Why did we fail to develop a qualitatively new veteran policy during 2014-2021?”** The answer we have found, and, accordingly, our main thesis, is that **at every stage of the policy cycle, the process of developing veteran policy faced systemic problems.**

At the stage of **problem identification**, the process of developing veteran policy faced the dominance of the old approach: solving problems and meeting the needs of veterans of past wars through paternalistic post-Soviet instruments (dozens of benefits and social payments). Given the structural changes in its social, government, economic, and the demographic situation, Ukraine was and still is unable to fulfil all the declared commitments under the paternalistic post-Soviet veteran policy. Nevertheless, the new problems of veteran policy had to compete for attention and resources with old demands that could not be properly met. Although various stakeholders identified many old and new problems of veteran policy, all these problems were not based on an assessment of the impact of the previously implemented veteran policy, as there was no proper monitoring and evaluation of this policy.

At the stage of **agenda setting**, veteran policy faced challenges related to prioritisation and lack of consensus on fundamental issues. Veteran policy issues were relatively unimportant and not a priority for the public agenda. Wontroversial ideological foundations of the policy (debates on the social order, social contract, the role of the state, etc.) made it challenging for stakeholders to find a consensus on specific ways to change veteran policy. The definition of the term “veteran” was also controversial, as evidenced by questions as such: 1) Should participation in combat be required to be considered a veteran? If so, for how long? 2) Can active military personnel have veteran status? 3) Which wars should the new veteran policy address? Different understandings of the purpose of veteran policy hinder the definition of a set of instruments that would have public support both for inclusion on the agenda and for promotion through other stages of the policy cycle.

At the policy **development stage**, the following aspects posed problems for the process of developing veteran policy: the non-strategic nature of policy planning documents, the absence or low quality of policy planning tools, the low quality of financial and economic calculations, the precision of planned policy changes, constitutional flaws, and low technical and legal quality. No overall strategy for the development of a new veteran policy was created or approved. The number of systemic draft laws was extremely limited. Policy planning documents hardly used such policy planning tools as specific actions, deadlines and responsible parties, implementation resource analysis, performance indicators, monitoring measures, etc. Most documents were of low technical and legal quality and lacked financial and economic calculations. This situation highlighted the low capacity of the Ministry of Veterans to develop policy. The 2018 CCU decision complicated matters: veteran policy makers interpreted it as meaning that existing benefits and social guarantees could not be revised. This reduced the number of developed initiatives and prompted the development of complex legal structures to “circumvent” the 2018 decision, which worsened their quality. Additionally, the policy design proposed by the developers required additional funding, as new veteran policy instruments would require additional funds that could not be transferred from old, ineffective benefits. According to stakeholders, the cost of implementing new systemic laws ranges from UAH 88-180 billion. The developers of the veteran policy did not provide answers to the question “Where to get these funds?”

At the **policy approval stage**, veteran policy did not have a strong lobbyist. The most active supporters were MPs, who were the weakest lobbyists of the three legislative initiators. The Ministry of Veterans

failed to act as a lobbyist and ensure coordination of veteran policy with the most important stakeholders, attracting their support to promote and approve its initiatives. The political processes surrounding the establishment of the Ministry of Veterans and certain periods of its operation were unfavourable for the Ministry to fulfil its role as a lobbyist. Efforts to change the veteran policy encountered resistance from a large number of stakeholders who opposed changing the old rules (the existing veteran policy): over the twenty years of its operation, the veteran policy has “overgrown” with a well-established system of implementation: 22 CEBs, which are governed by 156 NLAs.

The issues of the previous stages of the policy cycle exacerbated the challenges at this stage, reducing the attractiveness of initiatives to change veteran policy and strengthening the arguments of those opposed to change. As a result, almost all laws adopted around veteran primarily focused on the consensus of equal justice, meaning that different political actors did not oppose extending benefits to new categories, as the presence of benefits for one category of people and their absence for another was seen as unjust. In other words, the changes in veteran policy consisted (almost exclusively) of its expansion - extensively adding new categories to the existing rules. This process was self-reinforcing. The use of veteran policy in political battles had negative consequences: 1) extremely limited support for the initiatives of the parliamentary minority in the eighth convocation of the VRU, 2) politicisation of veteran policy - its use in the election campaign at the end of the eighth convocation and, as a result, 3) distancing from veteran issues and shifting to an “emergency” agenda in the ninth convocation.

Few initiatives have reached the stage of **policy implementation**. Perhaps the only systemic initiative is the Programme for Physical and Psychological Rehabilitation and Readaptation. The Accounting Chamber identified numerous violations, shortcomings and deficiencies in the implementation of this Programme, demonstrating the low capacity of the Ministry of Veterans to implement the policy.

The low capacity of the Ministry of Veterans was due to several factors: 1) chronic staffing issues: around half of the staff positions at the Ministry were consistently unfilled (vacant), and this percentage only increased over time, reaching 89% in 2022; 2) staffing core of the State Service, who implemented the veteran policy prior to 2018, was fully transferred to the Ministry of Veterans, along with informal practices (internal motivation of employees, rules, customs, traditions, relationships, overall work atmosphere) that did not encourage efficiency and effectiveness, bringing the shortcomings of the State Service to the Ministry of Veterans; 3) nation-wide issues, such as low salaries for public sector employees; 4) shortcomings of the Ministry of Veterans leadership (in particular, instability of management teams): four ministers and their teams changed in the first two years of its existence, which, together with the issues of institutional continuity, levelled any achievements of previous teams; 5) external constraints, in particular a) the launch of the Ministry of Veterans and the transitional political period until August 2019, b) the merger and then separation of the Ministry of Veterans from the Ministry of Reintegration, c) the COVID-19 pandemic, d) the full-scale invasion on 24 February 2022. At the same time, other ministries also faced three of the four similar obstacles but managed to organize their work more effectively (on the other hand, these ministries had different political weight and starting positions). A systemic problem that complicated policy implementation was the fragmentation of powers to implement the veteran policy among 22 CEBs. Such an implementation system requires a strong coordinating body, which was not within the capacity of the Ministry of Veterans.

At the **monitoring and evaluation stage** of the policy cycle, almost all the issues of veteran policy were manifestations of broader problems within the public administration system. The Verkhovna Rada carried out a general assessment of veteran policy acknowledging the need for changes, but without knowing which policy instruments needed to be changed and how. The instruments to overcome this situation, such as standardized executive reports, audits by the Accounting Chamber, and post-legislative oversight, were not used by the Verkhovna Rada in 2014-2022. Instead, the Cabinet of Ministers focused on monitoring the implementation of measures, but tracking the implementation of these measures was largely a substitute for tracking the impact of these measures (i.e. the effects

of the implemented policy) on policy beneficiaries (veterans). Specifically, the study of impact on beneficiaries was not planned, as there were no organisational, staffing, or financial foundations for this, no indicators (including those aimed at assessing the condition of veterans themselves), and the objectives of the programmes and policy goals did not have their own performance indicators and were disconnected from the implementation of measures; there was no evidence base. There was no effective mechanism for providing reliable and verified feedback from veterans. In addition, there was a gap between government and budget planning, which was based on the principle of implementing measures rather than addressing veteran problems. Most critically, policy monitoring and evaluation failed to provide credible information on the effectiveness and efficiency of the policy measures taken, their impact on veterans, and whether their problems were being solved. Consequently, the monitoring and evaluation stage failed to fulfil its primary function – assessing whether the implemented policy was effective and helping identify issues for the future iterations in the policymaking cycle.

The problems encountered at different stages of the policy cycle had a specific negative impact on meeting the needs of veterans and their families. To adequately respond to the needs and requests of veterans, it is necessary to first identify these needs and requests, assign them sufficient political weight to be included in the agenda, develop solutions that address these needs, adopt these solutions, and once adopted, implement, regularly monitor and evaluate them to adjust policies that will meet the needs. Accordingly, issues at each stage of the policy cycle have resulted in slower and less effective identification of veteran needs, more difficulty in getting solutions to address needs on the agenda, poorer design, weaker approval process, worse implementation, and inadequate monitoring and evaluation. As a result, needs were not being met.

In addition to systemic obstacles, each stage of the veteran policy cycle also had cross-cutting issues that were difficult to attribute to a single stage.

Unrealistic expectations were present at almost all stages of the veteran policy cycle. Over the course of eight years, many officials continuously made promises to veterans (often unrealistic ones) that were not fulfilled and led to dissatisfaction with the policy and eroded veterans' trust in the state. This complicated policy reforms. False expectations have a negative impact on all stages of the policy cycle because: 1) they replace the real identification of current issues with the demand for compliance with old, often unrealistic promises; 2) they increase the inconsistencies between the conceptual foundations of veteran policy; 3) they create legislative spam at the stage of policy development, unbalance promising initiatives with unrealistic promises; 4) they create chaos at the policy approval stage; 5) they send ambiguous signals to policy implementers, leading to misunderstandings.

Veteran policy was negatively affected by **systemic problems that affect the entire state policymaking process**. These included the low quality of parliamentary draft laws, the widespread problems with financial and economic calculations, unprofessionalism and unskilled staff, shortcomings in the civil service system, constitutional constraints on social guarantees, and the unpredictable impact of political struggles on public policy. Although these and some other issues are systemic, they can be circumvented or their impact mitigated. However, this was not the case for veteran policy, which had a low priority compared to other areas, and politicians, policy makers, and most stakeholders prioritised other areas of activity and directed their attention there.

Attempts to [re]shape veteran policy in Ukraine from 2014 to 2021 occurred **alongside with policy reforms in many other areas** (healthcare, decentralisation, education, defence, security, etc.). Veteran policy was often inconsistent and uncoordinated with reforms in other areas. It was veteran policy that suffered from this inconsistency. The inconsistency of veteran policy with decentralisation reform and healthcare reform is a striking example.

Challenges related to the representation of veteran associations stemmed from the fact that ATO/JFO veterans established thousands of organisations without forming a single or even a few large associations. This has created numerous obstacles for veteran policy makers in engaging with veteran

organisations, including the lack of clear partners that are understandable to the authorities and can conduct a dialogue on behalf of a large number of organisations (thus representing the veteran community). As a result, decision-makers struggled to identify whom they should consult at various stages of the policymaking process. This created preconditions for decision-makers to choose the most convenient problems (the easiest to solve) and the most convenient (loyal) organisations for themselves and to focus (during consultations) on them.

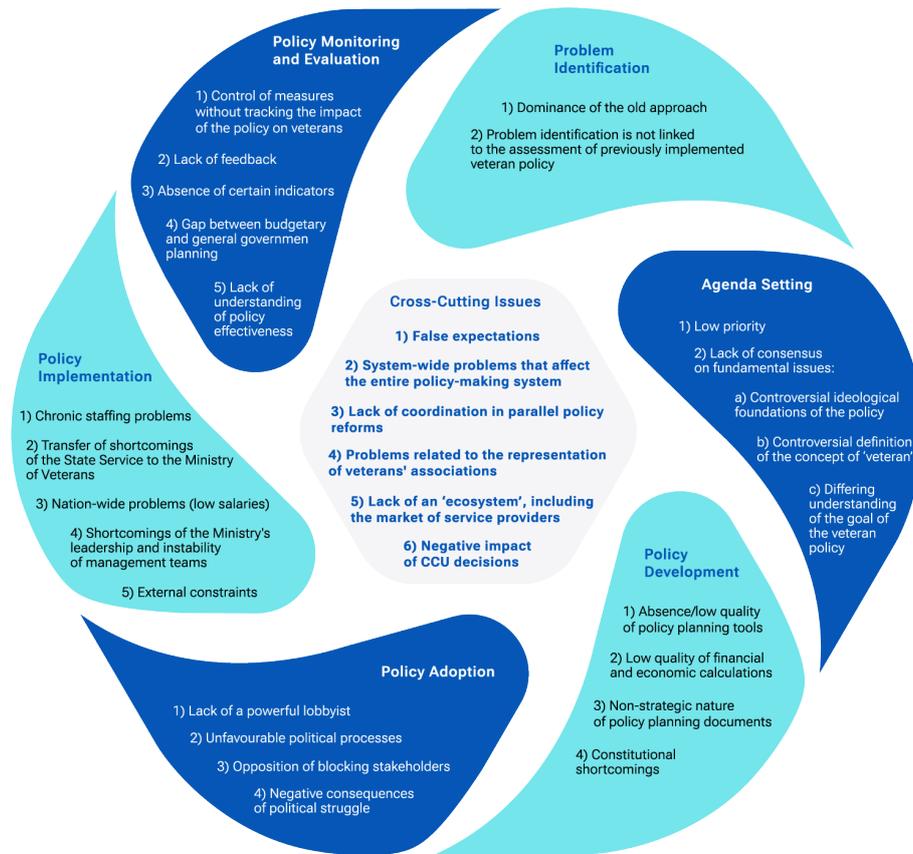
The absence of an “ecosystem”, including a market for service providers in new areas of veteran policy, significantly complicated the policymaking process (for example, in the case of sports rehabilitation for veterans). Due to the lack of a developed market: 1) veterans faced greater difficulty in formulating their requests and needs, while policy makers struggled to identify them; 2) fewer stakeholders promote the inclusion of these issues on the agenda; 3) it is more difficult to develop a working and cost-effective mechanism for meeting needs, and it is more difficult to make correct calculations (primarily financial), forecasts, and impact assessments; 4) these challenges reduced the likelihood of such initiatives being approved; 5) implementation of initiatives in areas where there is no established “ecosystem” and market means the actual absence of non-state actors and competition, which, in turn, means low quality and accessibility of services at high cost; 6) monitoring and evaluation of the policy are also complicated, as the sector functions in artificial conditions, there are no adequate benchmarks for comparing and determining the quality of services provided and criteria for determining their “effectiveness”.

A significant challenge for veteran policy is the issue of the constitutional level. These constraints are not only of a legal nature, but their negative impact is also **largely preventive, as it has changed the attitude of stakeholders to many veteran policy initiatives, even without the CCU making decisions on these initiatives**. In 2018, the Constitutional Court annulled the provisions of only one law, and it was a very specific law, which, without any compensation but with a clearly defined motivation (budget savings), established an additional condition for receiving benefits, which led to the actual cancellation of these benefits for some recipients. After that, the position of the Constitutional Court began to be pre-emptively considered at all stages of policymaking, including agenda-setting, policy development and approval. The single CCU decision to **repeal a very specific law proactively imposed restrictions on dozens of initiatives** aimed at reforming veteran policy. In this context, perhaps the main mistake of the post-2013 veteran policy was made at the very beginning of the ATO - in May 2014. This mistake was driven by noble intentions - to provide at least minimal state support to those who defended Ukraine’s independence and territorial integrity. The mistake was that ATO participants were integrated into the existing dysfunctional, inefficient, outdated system of veteran policy - a system that turned out to be extremely difficult to change and make work effectively.

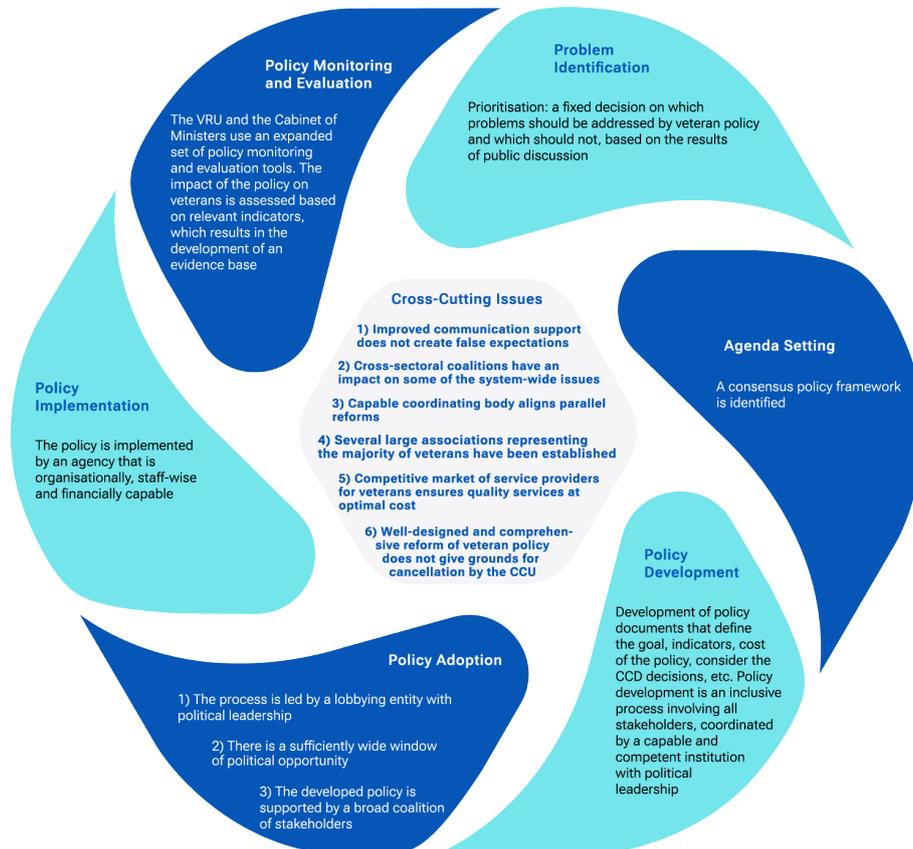
We have identified **the tasks that a veteran policy should address** to successfully navigate all stages of the policy cycle and achieve its goal of addressing veteran issues. These tasks are based on the challenges identified at different stages of the policy cycle, as well as on expert opinions obtained during the research. Thus, the objectives are to address the following issues:

- ▶ Defining a new status system.
- ▶ Specifying services, opportunities and benefits to be provided to veterans by the state.
- ▶ Determining how to amend current legislation in view of the CCU decision.
- ▶ Determining costs and sources of funding for veteran policy.
- ▶ Designing the service provision system (inclusive, exclusive or mixed design) for veterans.
- ▶ Defining a system for developing veteran policy.
- ▶ Determining the correlation between the veteran policy and defence force recruitment of Ukraine
- ▶ Designing the implementation framework for the veteran policy “on the ground”.

Policy Cycle Challenges



Solutions on how to develop policy



Methodology:

What, How, and Why Was Researched

The study of veterans' needs and issues, as well as broader veteran policy, has not been a new topic in Ukraine for at least 10 years. There has been a lot of research on veterans: their problems and needs (including gender-specific challenges), international practices in veteran policy, the nuances and gaps in legislative regulation in this area, veteran benefits, sociological portraits and perceptions of veterans, etc. In other words, the added value of similar studies in the tenth year of the Russian-Ukrainian war is inevitably decreasing with each new analytical or research text¹.

At the same time, an analysis of studies from different periods reveals descriptions and analyses of the same problems, gaps, and needs. Many stakeholders, experts and observers involved in veteran policy still say that veteran policy remains essentially unformed, and the set of public policy instruments of modern Ukraine is almost entirely borrowed from the times of the Ukrainian SSR. **Has 10 years, more than a dozen strategic and operational documents, a dedicated ministry, the initiation of hundreds and adoption of dozens of legislative initiatives, as well as billions of taxpayer hryvnias spent since 2014, been insufficient to create a relevant and effective response to this new societal problem? What has happened, and what continues to happen within the responsible state institutions at different stages of veteran policy development? Finally, how does the activity – or inactivity- of state institutions influence the resolution of this societal problem?**

The authors of this study look at the case of veteran policy as a case study and an important precedent. By answering the question **“Why did we fail to develop a qualitatively new veteran policy during 2014-2021?”**, this report simultaneously provides a detailed examination of how **Ukrainian decision-making system operates**. The case of veteran policy is perfectly suited for such a scale-up, as it is an example of a completely new societal problem involving new social groups (veterans and associated individuals) whose interests should be considered in the process of developing public policies.

Veteran policy existed before 2014, i.e. before the Russian aggression against Ukraine, and continued to exist after 24 February 2022, i.e. after the full-scale invasion. This study focuses on two key time-frames: a) from 2014 - the emergence of new social groups and the need to respond to their requests to the state, and b) 2022 - a significant extension of these groups due to the growth of the defence forces, against the background of reduced state capacity and a redefined agenda².

To answer these questions, the authors of this study used several **approaches and methods**, primarily **institutionalism and public policy analysis**. That is, veteran policy is viewed through the prism of

¹ At the same time, the expansion of the circle of ultimate policy beneficiaries of different socio-demographic composition leaves room for relevant research aimed at studying such beneficiaries.

² In this chapter, a separate methodological note is necessary: veteran policy, like any policy, can be divided into certain periods - a set of logically, organisationally, systematically, structurally, and teleologically interrelated events and activities. Based on these criteria, four periods of veteran policy can be identified: the first period of 1991-2014 (from the declaration of independence to the beginning of Russian aggression), the second period of 2014-2018 (from the beginning of Russian aggression to the establishment of the Ministry of Veterans), the third period of 2018-2022 (from the establishment of the Ministry of Veterans to the beginning of full-scale invasion), and the fourth period began in 2022 (with the beginning of full-scale invasion).

There is another additional reason why the study is limited to 2022. Since the beginning of the full-scale invasion, the state has introduced measures to restrict access to some information, significantly limiting the potential to obtain, analyse and utilise this information.

formal and informal rules, institutions and mechanisms of how these **rules and institutions ensure policymaking**.

The policy cycle analysis model used in this study allows the division of policy into stages. Each of these stages performs its own functions and is interconnected with other stages to form a system - the policy cycle³. The policy cycle model is primarily used as a means of structuring veteran policy, a kind of “glasses” that allow a clearer view of what happens in the decision-making system at different stages. There are different models of the policy cycle⁴, but this study uses the classic model, which consists of six stages: problem identification, agenda setting, policy development, policy adoption, policy implementation, and policy evaluation. Based on the results of the policy evaluation, a new cycle begins: in fact, the evaluation itself identifies issues with the current policy, which can then be included in the agenda for the new cycle. In fact, the main part of the study is structured according to these stages.

Policy cycle analysis is often perceived as a governmental analysis only. However, this is not entirely the case for Ukraine. The Verkhovna Rada of Ukraine has traditionally been much more involved in the policymaking process than some foreign parliaments. This is due to several factors, but in the context of the policy cycle, two are the most relevant: 1) in Ukraine, the most typical instrument for policy implementation is rulemaking, with lawmaking being the most valued by stakeholders, and 2) draft laws in Ukraine are immediately ready-made solutions that include both problem identification (often without prior analytical work), agenda setting, and policy development, so work in these stages of the policy cycle, as well as the development and refinement of alternative options, takes place within the Verkhovna Rada. Therefore, the legislative process in the Verkhovna Rada of Ukraine is an important part of the policy cycle, without which the analysis of the policy cycle would be incomplete. In addition, an analysis of the policy cycle in Ukraine without an analysis of the role of the President of Ukraine in it would also be incomplete, given the role and influence of the guarantor of the Ukrainian Constitution. For this reason, the analysis of the policymaking cycle includes both the actions of the Verkhovna Rada and the President to offer a more comprehensive view of policy development and to better understand the issues that persist throughout the entire policy cycle.

Thus, this study does not provide a comprehensive assessment of veteran policy, but instead focuses on the development of veteran policy, which is quite typical and indicative of policymaking in Ukraine in general. To state this more specifically:

- ▶ We did not study veterans, their needs, their perceptions, their socio-demographic characteristics.
- ▶ We did not examine how veterans are reintegrated in the United States, Croatia, Israel, Australia or any other countries, how they provide psychological assistance, what benefits they have, etc.
- ▶ We did not investigate the advantages and disadvantages, the possibility of implementing any specific models of psychological assistance, veteran entrepreneurship, employment or other areas, nor did we offer relevant recommendations.

³ We tried not to fall into the trap of the shortcomings of the political cycle concept, so we used this tool carefully, keeping in mind that the political process is often unpredictable, irrational, multidimensional, nonlinear, complex and interconnected, and used other analytical tools to explain why veteran initiatives move between different stages of the political cycle and to explain the impact of political struggle on public policy.

We have tried to use all the advantages of the policy cycle as an analytical tool that allows us to streamline the political process and analyse separately each stage of the political cycle, which has separate functional roles for different actors in the political process.

More information on the stages of the political cycle can be found, for example, [here](#).

⁴ Other models may have more detailed or additional stages, for example, policy design and planning may be separated, or there may be a decision-making stage after policy evaluation to decide whether to continue the policy.

- ▶ We also did not propose our own vision of what benefits, opportunities, and privileges should be provided to veterans, or which categories of individuals should receive veteran status, and which should not.
- ▶ We did not conduct a detailed review of the privileges, the legislation that establishes these privileges, and have not developed recommendations for changes to specific procedures or regulations to improve the provision of a particular privilege.

What we analysed:

- ▶ 27 policy documents (plans, programmes, strategies, concepts, etc.).
- ▶ 17 decisions of the Constitutional Court of Ukraine.
- ▶ 196 draft laws and an even larger number of accompanying documents.
- ▶ 116 various normative legal acts: laws, resolutions of the Verkhovna Rada, the Cabinet of Ministers, orders of ministries, and other subordinate legal acts.
- ▶ Public statements and promises from government officials.
- ▶ Research, analytical reports, articles, news, public interviews, and other open source materials.
- ▶ 15 public opinion surveys.
- ▶ 20 semi-structured in-depth interviews with experts and stakeholders in veteran policy. The interviews were conducted with⁵:
 - Current and former representatives of the Ministry of Veterans Affairs and the Ministry of Social Policy, the State Service of Ukraine for War Veterans and ATO Participants;
 - Current and former members of Parliament;
 - Representatives of the Advisory Council on War Veterans and Families of Fallen (Deceased) Defenders of Ukraine under the President of Ukraine;
 - Representatives of institutions working in the field of veterans' affairs;
 - Representatives of the civil sector in the field of veterans' affairs;
 - Veterans.

⁵ The interviewees could combine several roles, for example, being both veterans and having experience in both the civil society sector and the executive branch. Quotations from these interviews in *italics* are used in an impersonal form as illustrative material in the text of the study.

1. Problem Identification

The policy cycle begins with problem identification. Changing the current situation, which is typically the aim of a policy, requires that this current situation be identified as a problem. This situation must be unacceptable to a specific segment of society, which then articulates its dissatisfaction in the public domain.

Veteran policy emerged in Ukraine in the early 1990s, almost simultaneously with the declaration of independence, and remained unchanged until 2014. The design of this policy had a direct impact on the problems identified during 2014-2021, a significantly later period with completely different conditions. The issues addressed by the main **current law on veteran policy are those of the early 1990s**. They can be identified retrospectively by analysing the instruments of veteran policy (in the sense of the term “policy” as a certain plan or set of ideas implemented at the official level⁶), in particular the legislative framework. Already in 1993, the fundamental law “On the Status of War Veterans and Guarantees of Their Social Protection” was adopted⁷. It reflected the post-Soviet trend of adopting similar laws of similar content and was unified with similar laws of the CIS countries.

The 1993 law was aimed at veterans of past wars. The “youngest” war referenced was the war in Afghanistan, which had ended four years before this law was adopted. The primary focus, however, on veterans of the Second World War (the Great Patriotic War in the terminology of the time). In addition, the law also recognised participants in the Civil War (1917-1922) and participants in conflicts involving USSR military personnel (with a list of several dozen operations in various countries of Africa, Asia and Central and Eastern Europe in the period between 1924 and 1989). In other words, already in 1993, the majority of veterans (the only significant exception being veterans of the Afghan war) targeted by the 1993 law were of retirement or pre-retirement age.

The 1993 law covered not only veterans, but also war participants (who were registered there from the very beginning, i.e. from 1993). Over time, the circle of individuals who could claim the status of war participants increased and eventually became so broad that almost all people born in the 1930s or earlier could be war participants.

Before 2014, veteran policy in Ukraine was, to some extent, part of a broader social policy. What could [post]communist politicians in the early 1990s offer to retirees? The most common policy tool at the time was benefits provided in a situation where almost the entire economy was state-owned and all social services were provided by the state: hospitals, pharmacies, resorts, transport, and utilities were state-owned. In other words, the combination of the post-Soviet style of policymaking and the availability of infrastructure for the provision of benefits proved effective. In this case, **the identified problem of veteran policy can be described as the social insecurity of a specific group of people**. At the same time, **the expectations of citizens** at that time (and partly still today) were **shaped by the paternalistic Soviet paradigm of state policy**.

Pensioners, some of whom were targeted by the then veteran policy, are also an exceptionally **important electoral category of citizens**. The desire to secure electoral points among pensioners was often cited as the reason why the 1993 law was repeatedly amended to include new benefits and new

⁶ Policy // Cambridge Dictionary

⁷ On the Status of War Veterans and Guarantees of Their Social Protection: Law of Ukraine of 22.10.1993, No. 3551-XII.

categories of beneficiaries. For example, in December 1998, before the start of the new budget year and six months before the 1999 presidential election campaign, the 1993 law was amended to include a new benefit, the “5 May Payment”, which was introduced for certain categories of beneficiaries. Similarly, in early 2004, six months before the next presidential election, the Law “On Improving the Financial Situation of Combatants and Persons with Disabilities Resulting from War” was adopted⁸, which was supplemented with new provisions between the first and second rounds of the presidential election. The content of the two-article law (this law literally consisted of two articles) was simple - providing war veterans and combatants with a monthly allowance of 40-70 hryvnias (\$8-12 at the exchange rate of the time⁹). Remarkably, the allowance amount established by this law has never been adjusted, and the law remains in force to this day.

In the period up to 2014, only one fundamentally new, “non-Soviet” category was added to the beneficiaries of the veteran policy - Ukrainian peacekeepers who participated in international peacekeeping missions (e.g. in Iraq or Kosovo). However, this category was too small and disorganised to form a demand for a new policy. Consequently, the perception of veteran policy as “privileged” remained until the beginning of the Russian-Ukrainian war. To this day, the **paternalism** that dominates Ukrainian society **remains one of the central elements of veteran policy**, despite Ukraine’s status as a market economy and transitioning to market-oriented practices.

Among the categories targeted by the 1993 law, veterans of the war in Afghanistan deserve special attention. Afghan veterans were the youngest category of veterans (at the time of the adoption of the Law), and this category was quite numerous compared to participants in other Soviet military operations. Afghan veterans formed their own special collective identity, which was manifested, namely, in the establishment and effective functioning of veterans’ organisations. This allowed for the formation of an institutionalised movement to promote their interests: such organisations could mobilise their members to organise rallies, initiate the creation of various governmental structures to work with veterans, and even participate directly in these structures. Over time, this model will serve as an example for some veterans of the Russian-Ukrainian war to create veteran organisations and civic activism to advance their interests. Interestingly, some experts believe that veterans’ legislation was adapted specifically for Afghan veterans, who could receive the social guarantees they needed through self-organisation tools (these tools were not used, for example, by veterans of the Second World War):

“Service veterans, Afghans who have long been part of this system, are quite comfortable with it. They would know how to navigate social protection offices as if it were second nature. At the start of the year, they already have their issues sorted: phone bills, holiday vouchers, dental care”

Since 2014, with the emergence of the new category of veterans - veterans of the Russian-Ukrainian war - new problems have been identified. First, this concerns the call for a comprehensive review of veteran policy, which stems from the problem that stakeholders most often formulated as **the perception of veteran policy as generally ineffective**. For example, the TSC on the Legal Status of War Veterans in its 2020 report wrote that *“no comprehensive approach has been proposed to improve the system of social protection for war veterans and service members”* and *“society as a whole has an opinion that the state is not doing enough for veterans”*¹⁰. The civic sector also

⁸ On Improving the Financial Situation of Combatants and Persons with Disabilities Resulting from War: The Law of Ukraine of 16.03.2004 No. 1603-IV.

⁹ Exchange rates archive // Ministry of Finance.

¹⁰ On the Preliminary Report of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the Legal Status of War Veterans for the Six Months of Activity: Resolution of the Verkhovna Rada of Ukraine of 03.06.2020 No. 659-IX.

considered the state approach to solving problems ineffective: *“the problem of state policy is to promise and try to pay for benefits and pay little attention to those areas that will create conditions for financial independence and lack of need for benefits”*¹¹. Surveys have recorded dissatisfaction with the existing veteran policy: *“32% of the surveyed veterans and military personnel indicated that the existing support is ‘completely ineffective’, another 29.5% indicated that it is ‘rather ineffective’. In contrast, only 2.4% of respondents considered state support for veterans in the field of employment to be ‘completely effective’, and 4.4% considered it ‘rather effective’. 31.7% of respondents found it difficult to answer this question”*¹². The large percentage of respondents who found it difficult to answer the question was also indicative and may indicate both the absence of any points of contact with this policy and the absence of a clear demand for such a policy.

A conceptually new identified problem of veteran policy is the unsatisfied veteran request for an organised return to civilian life. This refers to **rehabilitation and readaptation** after participation in combat operations. As of 1993, veterans of the Second World War, Afghanistan and other foreign wars had long since returned from the front, so there was no such request. Instead, after 2014, when there was a constant rotation process and a large number of people returned from the battlefield, such a need emerged. The Concept of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of ATO Participants formulates this problem as follows: *“the state lacks an effective system for providing rehabilitation and readaptation services”*¹³. The public describes the problem as follows: *“Lack of work is one of the main problems faced by veterans. Without regular work and stable income, veterans are vulnerable to even more problems. Thus, the primary objective of reintegration programmes should be to support veterans in the transition from military service to employment after discharge.”*¹⁴

Another previously unidentified problem was the deterioration of mental health among veterans. This problem was identified post-2014, partly due to the reasons already mentioned above: the process of deterioration of psychological health was taking place in real time and was quite widespread. In addition, unlike in 1993, as of the mid-2010s, in Ukraine, as well as around the world, the public perception of mental illness and the value of mental health has changed, there was a noticeable increase in mental health professionals, and their methods had become more diverse and widely accepted. The aforementioned Concept defines the problem of deteriorating mental health among veterans as *“the deterioration of their psycho-emotional state, the emergence of psychosomatic diseases and social maladjustment.”*¹⁵

At the same time, the system of both physical and psychological rehabilitation, according to the WHO Assessment Mission, had significant shortcomings: *“legislative and regulatory acts on rehabilitation in Ukraine are fragmented, the level of coordination between the authorised central executive bodies and organisations providing rehabilitation medicine services is insufficient, and a comprehensive system of rehabilitation services that should cover all stages of care has not been established. Rehabilitation*

11 Veterans: a community that overcomes social dependency // NGO “Space of Opportunities”.

12 Veterans’ needs and obstacles to employment, June-July 2023. PP. 76-77.

13 On Approval of the Concept of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression by the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation for the Period until 2022: Order of the Cabinet of Ministers of Ukraine of 12.07.2017 No. 475-r.

14 Veterans Reintegration Programme. Analytical Report of 14 July 2021. P. 8.

15 On Approval of the Concept of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression by the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation for the Period until 2022: Order of the Cabinet of Ministers of Ukraine of 12.07.2017 No. 475-r.

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services are inaccessible to many people in need and are traditionally provided by sanatorium-type facilities and health resorts, and rehabilitation staffing does not meet international and European standards.”¹⁶

At the same time, some of the policy problems before 2014 were carried over to a later period. For example, this concerns **the provision of housing for veterans**. The idea of providing certain categories of citizens with free housing from the state dates back to Soviet times. This idea, along with legislative norms, was transferred to the legislation of independent Ukraine. For example, the current Housing Code, adopted in 1983, begins with the words *“As a result of the victory of the Great October Socialist Revolution, the necessary preconditions were created in our country to solve one of the most important social problems - meeting the housing needs of workers. By implementing Lenin’s ideas of building a communist society [...], the Soviet state has been consistently implementing the housing construction programme developed by the Communist Party. The high rate of development of the state and public housing stock based on state plans, and the measures taken by the state to promote cooperative and individual housing construction, create the necessary conditions for ensuring the right to housing guaranteed by the Constitution of the USSR and the Constitution of the Ukrainian SSR. [...] Soviet housing legislation is designed to promote the right of citizens to housing, the efficient use and protection of the housing stock.”¹⁷* The preamble containing these words was removed¹⁸ from the Housing Code only after the full-scale invasion began, but the housing provisions that had the same origin as the preamble remained and are still in force (all of which remained in force during 2014-2022). The Soviet housing policy created the conditions for citizens to be provided with housing through *state plans and housing construction programmes*. Although the conditions for providing housing (from the state) disappeared with the transition from a planned to a market economy (Ukraine did not implement *the housing construction programme developed by the Communist Party*), the norms according to which Ukraine should provide free housing to at least certain categories of citizens are still in force.

In line with paragraph 14 of part one of Article 12 of the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection”¹⁹, *ball combatants in need of better housing conditions were entitled to priority provision of housing. If combatants were injured, contused or maimed while participating in hostilities or performing military service, they shall be provided with housing within two years of being registered with the housing register*. Certainly, these provisions were not implemented, and even some veterans of the war in Afghanistan, including those with disabilities of the first and second groups, did not have apartments as of 2014²⁰: *“how many Afghans with disabilities of the first and second groups are on the housing register after 30 years of the war. I counted - 400 people”*. If we count all “Afghans”, then even as of 2019, approximately 8,000 of them were still on the housing waiting lists²¹. While in 2014, these hundreds and thousands of “old” veterans were joined by thousands and tens of thousands of “new” veterans. In addition to veterans with injuries, contusions and disabilities, these new veterans included those who lost their homes after the occupation of Crimea and certain areas of Donetsk and Luhansk regions. Thus, the state, adhering to the old system of housing provision

16 Report of the Accounting Chamber of 06.06.2023 No. 12-5 “On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine”.

17 Housing Code of Ukraine: Law of Ukraine of 01.08.2021 No. 5464-X.

18 On de-Sovietisation of Ukrainian Legislation: Law of Ukraine of 21.04.2022 No. 2215-IX.

19 On the Status of War Veterans and Guarantees of Their Social Protection: Law of Ukraine of 22.10.1993, No. 3551-XII.

20 15 February - Day of Honouring Participants of Combat Operations on the Territory of Other States and the 24th Anniversary of the Withdrawal of Soviet Troops from Afghanistan // Ukrainian Union of Afghanistan Veterans (Soldiers-Internationalists).

21 Veterans are an advantage of the country that needs to be stimulated and given tools for self-realisation // Ministry of Veterans Affairs.

(purchasing apartments at the state's expense and transferring them to veterans), was unable to meet the previous demand, let alone the vastly increased demand, because state housing construction did not correspond to the scale of the Soviet era, and funds for addressing this need were not allocated.

Veterans of all wars face **health issues** resulting from their participation in hostilities. The 1993 Law "On the Status of War Veterans and Guarantees of Their Social Protection" offered various solutions to address this problem, including: *free provision of medicines, immunobiological drugs, medical devices on prescription, free dental prosthetics, sanatorium treatment, annual medical examination; for persons with disabilities caused by war, benefits such as vouchers and free provision of prostheses were added*²². However, as of 2014, the benefits declared in the legislation did not automatically resolve all the health-related issues of veterans. Challenges were related to **financial support and the capacity of the old system to meet the increased needs of veterans**.

Provision of free medicines can be relatively easily implemented (at least in terms of free medicines, regardless of their availability) in conditions where pharmacies are state-owned or municipal. If the pharmacies are private, there are certain difficulties due to lack of funds. In such a situation, the state restricts access to free medicines through administrative methods. Veterans, in turn, identified problems created by these administrative restrictions. For example, the list of free medicines is limited by certain requirements (criteria) combined with the inaccessibility of free medicines in most pharmacies²³. A similar situation occurred with dental prosthetics, which is often inaccessible to veterans: according to a 2019 study, only 16% of veterans were able to receive priority free dental prosthetics.

Another widely utilised (regardless of efficiency and effectiveness) means of addressing health issues is sanatorium-resort treatment. However, even this option has not been available to all individuals holding veteran status. For example, as early as 2011, underfunding was already noted as a major obstacle, making sanatorium-resort treatment ineffective in adequately serving vulnerable groups²⁴. Both underfunding and the difficulty of obtaining services significantly reduces the functionality of sanatorium-resort treatment²⁵. The emergence of a new category of veterans - ATO veterans - has not improved the situation with the availability of sanatorium treatment. Thus, in 2020, 32% of those seeking this service were unable to use it or obtain financial compensation for it²⁶.

The number of ATO/JFO veterans requesting medical care continuously increased from 2014 onwards, while the capacity to meet their needs has not increased significantly. The old exclusive system, which was based on 25-30 hospitals for war veterans, was not significantly modernised and therefore could only partially meet the needs of veterans: for instance, these hospitals rehabilitated 55,000 ATO participants in 2014-2018, although as of 2018, their number was 344,000²⁷. Moreover, the exclusive system has not adapted well to healthcare reforms: for example, in 2020, the National Health Service of Ukraine (NHSU) signed a contract with 25 hospitals out of 30, but only financed part of the hospitals' expenses, which did not cover all their needs²⁸. This situation was caused by the fact that some

22 On the Status of War Veterans and Guarantees of Their Social Protection: Law of Ukraine of 22.10.1993, No. 3551-XII.

23 Volosevych Inna, Kostiuchenko Tetiana, Khadzhy Ivan. Report on the Results of the Study of the Social Protection System for Combatants and Family Members of the Fallen in the ATO.

24 Avtushenko I.B. Sanatorium and resort treatment as an important component of medical care for military personnel of the Armed Forces of Ukraine.

25 Huryshkina O.V. Public and administrative support of sanatorium and resort treatment of persons with disabilities and war veterans. 2023.

26 Life after the conflict: a survey on the socio-demographic and socio-economic characteristics of veterans of the conflict in eastern Ukraine and their families // International Organization for Migration (IOM). 2020.

27 Poroshenko: 344 Thousands Military Participated in Combat Operations in Donbas // Ukrinform.

28 Medical care for veterans: What are the problematic aspects and how to solve them? 2021.

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hospitals did not meet the requirements of the NHSU, such as lacking intensive care units²⁹. Despite the system's shortcomings, the transition to a more inclusive system did not take place.

All these problems have been identified by various **stakeholders of veteran policy**, who are worth mentioning here. The primary stakeholder and beneficiary of veteran policy is, of course, the veterans themselves. They come from different age groups, genders, backgrounds, have different levels of income, different health conditions, etc. In addition to them, family members of veterans are also beneficiaries. Another group of stakeholders is made up of government officials: the Verkhovna Rada, the Cabinet of Ministers, the President, and local authorities, who are involved in veteran policy in one way or another. In a broader context, almost the entire society is a stakeholder of veteran policy: communities where veterans live, organisations that provide various services to veterans. In addition, depending on the direction of the veteran policy, its stakeholders may include medical and educational institutions, employers, developers, public associations, among others. There can be an extremely large number of stakeholders in veteran policy, as veteran policy has the potential to be a cross-cutting policy aimed at veterans, and through them, at the whole society, all social relations in which veterans are involved.

The analysis of problem identification in the context of policy cycle analysis could include information on the exhaustiveness of the identified problems (whether all problems have been identified). However, this approach is more appropriate for analysing a specific document, such as the Strategy, which would exhaustively describe the problems, the goal, the ways to solve the problems/achieve the goal, and the indicators. **Veteran policy has never had such a single document - neither in 2014, nor in 2018, nor later**³⁰. Therefore, this analysis will not be fully relevant. However, it is possible to analyse some other characteristics of the problem identification process. As of 2014, the veteran policy was not properly assessed by the state authorities. Furthermore, with the beginning of a new stage, it has not been subject to comprehensive state monitoring and evaluation. Accordingly, the identification of problems in the veteran policy, including those carried out by state actors (the President, government officials, MPs), was not based on such an assessment. Instead, since 2014, non-governmental organisations, including representatives of civil society, have consistently been in the lead in identifying problems. Their research^{31, 32, 33, 34, 35, 36}, journalistic articles^{37, 38, 39, 40, 41}, social media

29 "As a rule, a war veteran has a "bouquet" of diseases - a combination of physical, mental, medical and social problems," Vsevolod Stebliuk // Army Inform. 2020.

30 Such Strategy was approved only at the end of 2024.

31 Sachuk Yuliia, Zviahintseva Mariia. Social policies for veterans, individuals with disabilities and pensioners. 2023.

32 Report on the Human Rights Situation in Ukraine 16 November 2018 to 15 February 2019 // Office of the United Nations High Commissioner for Human Rights.

33 Recommendations for Employees of Territorial Bodies of the Ministry of Veterans Affairs of Ukraine: Methodological Manual // Yurydychna Sotnia. 2020.

34 White Paper: Analysis of the System of State Support for Veterans and Their Families in Ukraine // Yurydychna Sotnia.

35 Friedrich Julia and Lütkefend Theresa. The Long Shadow of Donbas: Reintegrating Veterans and Fostering Social Cohesion in Ukraine. 2021.

36 Veterans in Ukraine: What's next? Reintegration of ex-service members; challenges and opportunities; gender aspect // International Alert. 2019.

37 Oksana Koliada. Veteran reintegration is necessary not for veterans, but for the state. 2018.

38 Maryna Yatskevych. What problems do veterans returning to peaceful life face? Explained by experts. 2020.

39 Lesia Shovkun, Dmytro Lykhoviy. War for the veteran. How society and the state fight for the psychological adaptation of ATO participants. 2016.

40 Yurii Lapaiev. Reintegration of veterans: Through new opportunities and business. 2021.

41 Shevchenko Sashko. Violence in the families of veterans. How is this problem solved in Ukraine? 2020.

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posts^{42, 43, 44, 45, 46}, speeches on air^{47, 48, 49, 50} were the primary sources of identified problems that were later used by politicians in draft laws or policy documents.

It is worth noting that such a method of identifying problems is not inherently flawed. On the contrary, it is one of the most effective methods of policy analysis. When state institutions respond to stakeholders in these matters, they demonstrate transparency and openness. How effectively they responded will be described in detail in Chapter 3: “Policy Development”.

At the same time, it is telling that, as of early 2022, no decision-making body had become a leader in developing veteran policy (including in terms of problem identification). Instead, they acted reactively, responding to hundreds of often contradictory requests and expectations from the non-governmental sector.

In conclusion, the stage of problem identification in veteran policy is the only stage of the veteran policy cycle that does not have significant shortcomings. Stakeholders, including government bodies and MPs, as well as public organisations and veterans themselves – have identified a range of problems in veteran policy: from the perception of veteran policy as largely ineffective to very specific sectoral challenges, such as deterioration of mental health. Of course, the above problems with veteran policy do not constitute an exhaustive list.

However, without a comprehensive strategic document for veteran policy, it is quite challenging to discuss the comprehensiveness of identifying veteran-related problems. At the same time, when developing such a strategic document, it is important to ensure inclusiveness and representation of the widest possible range of stakeholders.

Finally, it is worth noting one drawback at the stage of problem identification. All the problems described above are a set of opinions and positions of stakeholders, not the result of monitoring and evaluation of the previous iteration of the veteran policy cycle. Without combining the last stage of the cycle (monitoring and evaluation) with the first stage (identification), it is impossible to track the impact of the policy on the policy beneficiaries (veterans). This connection should be based on indicators that would measure veterans’ welfare and quality of life, i.e. using evidence-based data. However, such a monitoring and evaluation system did not exist either before 2014 or after (for more details, see Chapter 6. “Policy Monitoring and Evaluation”). Consequently, the identified problems were less likely to take into account the experience of policy development from previous iterations.

Nonetheless, many problems were identified in the first stage of the policy cycle, and these issues initiated new policy iterations. How these problems progressed through the following stages of the policy cycle will be discussed in the upcoming chapters.

42 Facebook Post. 2018.

43 Facebook Post. 2018.

44 Facebook Post. 2020.

45 Facebook Post. 2015.

46 Facebook Post. 2015.

47 Zhora Turchak on the Problems of ATO Veterans, Nadiia Savchenko and “Betrayal” on Facebook // Apostrophe TV. 2018.

48 Inna Omelchenko. Problems of Veterans of the Russian-Ukrainian War // GIT. 2020.

49 Current Problems of Veterans: Questions and Answers. Points of Support // Hromadske Radio. 2017.

50 Problems of Psychosocial Support and Psychological Assistance for War Veterans and Civilians // Ukrinform. 2017.

2. Agenda Setting

The second stage of the policy cycle is agenda setting. The essence of this stage is that the identified policy problems now compete for public attention and the attention of stakeholders, including decision-makers (the Verkhovna Rada and the Cabinet of Ministers). Successful⁵¹ initiatives gain enough visibility to be discussed in the media and/or be considered by decision-makers. Agenda setting also requires consensus (a shared vision of the future) on the issues and concepts that are being developed. This consensus must be shared by an influential group of stakeholders, which can then clearly articulate a perspective on how to solve the identified problem and thus put the issue on the agenda. This is where the veteran policy cycle begins to run into difficulties, because discussions on some fundamental, ideological issues did not allow for a consensus to be reached even at the stage of idea formation. The need for consensus grows with the importance and complexity of the initiative and the problem it is supposed to solve. Minor issues, such as changing the administration of specific benefits, might not demand consensus on overarching ideological matters. However, when it comes to systemic issues, such as a new veteran policy, the consensus of many stakeholders is needed to ensure that the initiative that is included in the agenda does not become a “stillborn”.

It is worth making a methodological remark here. The Ukrainian realities of the lawmaking process differ somewhat from the standard Western model of policymaking in terms of the sequence of stages. In the Western democratic world, where the classical model of the policy cycle has been established, agenda setting precedes policy development. In other words, first, an issue gains sufficient public importance, is included in the agenda, planned (policy is developed), approved, and so on. Instead, in Ukraine, draft laws and various government initiatives are often developed first, and only then are they put on the real or at least formal agenda. Therefore, in this chapter, we will try to take a broader look at the agenda and the problems that may prevent veteran policy initiatives from being conceptualised and reaching the stage of agenda setting.

2.1. The Importance of Veteran Policy

The extent to which veteran issues were important to society can be understood through the analysis of public opinion surveys. If any issue⁵² is of concern to society, then this **issue should be defined (understood, formulated) as a separate category, an independent problem**. This specific issue should also be important enough for professional social researchers - sociologists – to include this problem in the questionnaire, along with, for example, unemployment or political instability. Once included in the questionnaire, this problem should receive a sufficient number of responses, competing with other problems. That is by measuring these indicators - the presence and weight (if any) in public opinion surveys - we can get some idea of the public importance of veteran policy.

51 For example, the land market or the use of medical cannabis.

52 Here we are talking about issues in a broad sense, for example, corruption is a rather broad concept. The problem of corruption can be broken down into many components: petty and grand corruption, corruption in the courts and, for example, at customs, or even corruption related to a specific rule that gives too much discretion to an official. Speaking of veteran issues, we mean a broad understanding of this problem, which includes many smaller issues and sub-topics.

Before 2014, Ukrainian citizens were primarily concerned with economic decline and unemployment, as evidenced by various surveys conducted in 2007⁵³, 2008⁵⁴, 2009⁵⁵, 2010⁵⁶, 2011⁵⁷. Veteran-related issues were on the margins of public attention and were not perceived as significant or problematic. Topics related to veterans, such as *the threat of war or remembrance activities*, were also not considered socially important.

With the outbreak of hostilities, the situation began to shift. Society became increasingly concerned with topics related to veteran issues. In 2024, the reform of army and the defence sector ranked among the top three societal priorities⁵⁸. In 2015⁵⁹, 2016⁶⁰, 2017⁶¹, 2018⁶², the issue that concerned Ukrainians the most was the war in Donbas. In 2019⁶³, 2020⁶⁴ and 2021⁶⁵ the hostilities in Donbas were also a concern for Ukrainians, but their importance among other issues somewhat decreased, and in 2022⁶⁶, the hostilities and the restoration of territorial integrity returned to the forefront as the top priority. However, something else is equally important. **The issue of veteran policy was not considered significant enough as to constitute a separate category of societal problems**, while, for example, “low production levels”, or “rising utility tariffs (heating, gas, electricity)”, and “property rights on land” were singled out as separate societal problems.

Certainly, the wording of questions in public opinion surveys depends on sociologists, but sociologists, in turn, rely on the issues articulated within society⁶⁷. If stakeholders in the public space actively discuss the land market, this topic is included in public opinion surveys (“property rights on land”), added to the government agenda, and subsequently addressed. Veteran policy, on the other hand, has not gained the same public profile as, for example, the aforementioned land market issue. Stakeholders devoted less time to discussing veteran-related topics in the public space as they have to the land market. This, in turn, has led to the fact that initiatives to change the veteran policy have been less included in the agenda of state institutions and, accordingly, less likely to progress to subsequent stages of the policymaking cycle.

53 Balakireva O.M. Political situation and socio-economic attitudes of the population of Ukraine: June 2007 // Centre for Social Monitoring. 2007.

54 Balakireva O.M. Public opinion on the verge of 2008-2009: Assessment of the year and a look into the future.

55 Assessment of the greatest threats to Ukraine by the population // Sociological group “Rating” - 2009.

56 Rating of support for unpopular reforms and threats to the government and society // Sociological group “Rating”. 2010.

57 Threat Rating: Dynamics // Sociological group “Rating”. 2011.

58 Socio-political expectations of citizens // Sociological group “Rating”. 2014.

59 Dynamics of socio-political views in Ukraine // Sociological group “Rating”. 2015.

60 Dynamics of socio-political views in Ukraine // Sociological group “Rating”. 2016.

61 Dynamics of socio-political views in Ukraine // Sociological group “Rating” - 2017.

62 Dynamics of Socio-Political Views in Ukraine // Sociological Group “Rating” - 2018.

63 Dynamics of socio-political views in Ukraine // Sociological group “Rating” - 2019.

64 Socio-political views in Ukraine // Sociological Group “Rating”. 2020.

65 Socio-political views in Ukraine // Sociological Group Rating. 2021.

66 Socio-political views in Ukraine // Sociological group “Rating”. 2022.

67 Certainly, there is a question of primacy: who forms the request - is it sociologists who find topics that concern society, or vice versa - society reflects and responds to the options proposed by sociologists.

2.2. Debates Around the Ideological Foundations of the Policy

One of the key challenges for veteran policy in general, and for the inclusion of issues in this domain in the political agenda, is the lack of consensus among key stakeholders on some basic concepts and issues. Many initiatives in veteran policy have identified problems based on the worldview and values of their authors and developers. The position of the latter may well coincide with the worldview and values of the majority of society. However, some of the worldview principles on which the demand for a new veteran policy is based are not shared by a significant part of society, including some veterans. This applies to many levels of the state, social and economic system, as well as the principles of the social contract. This issue is particularly acute in the context of the role of the state in the lives of citizens. To what extent should/could the state interfere in the private life of citizens? To what extent should/could the state redistribute resources of some citizens in favour of others? To what extent can the state dictate to citizens the rules of behaviour in a particular area? To what extent should citizens be independent and responsible for their lives, and to what extent is the state responsible for the fate of each citizen? Countless philosophical works are devoted to answering these questions, and they form most of the positions of political ideologies (liberalism, conservatism, socialism, etc.). Each ideology provides distinct answers to related policy issues, such as: 1) Should veterans be treated as individuals capable of independent economic sustainability, or as a vulnerable group requiring state guidance and care? 2) Is it justifiable to increase taxation or divert funds from other sectors to support veteran policy? 3) To what extent should the state regulate the rules of private entrepreneurs' work, for example, to promote the employment of veterans?

These fundamental principles have clear practical implications. A state policy built around the principle of providing veterans with a large number of material benefits (e.g., subsidising utility draft laws or providing free housing) requires a high level of taxation and/or reallocation of significant funds from other social expenditures. Combining a socially oriented veteran policy with economic liberalisation and deregulation can be challenging. If veterans are viewed as individuals capable of making informed and reasonable decisions regarding their resources, the most logical form of support would be to provide them with financial resources they can independently allocate—whether for healthcare, education, or other needs. However, some veterans might spend these funds not on self-development, but on less beneficial activities (for example, alcohol or gambling). This argumentation is used when, instead of direct payments, veterans are offered to identify clear programmes (e.g., educational) or targeted areas of spending. From a libertarian perspective, the state should not, in principle, provide benefits to free and self-reliant individuals.

Ukraine as a state and Ukrainian society have failed to provide answers to these questions (both regarding veterans and defence policy - to what extent it is possible to increase spending on these areas at the expense of other areas) after the first stage of the Russian-Ukrainian war, i.e. since 2014. Partly, the lack of consensus on the level of spending on defence and veteran policies^{68, 69, 70} has led to an insufficient level of preparedness for a full-scale invasion in 2022, which has significantly increased the scale of the challenges that emerged in 2014 and had not been adequately addressed.

When addressing these issues, it should be noted that Ukraine largely continues to rely on post-socialist paradigms that are widespread in society and among stakeholders. However, a significant

68 Mykola Bielieskov. Publication in the Telegram network. 2022.

69 Palamarchuk Maksym. Money for defence is being spent in the wrong places: We plan many different ships instead of missiles and aircraft // Texty.org.ua. 2021.

70 Defence Minister complained to the Ministry of Finance over the reduction of the maximum expenditure on the army in 2021-23 // Statewatch. 2020.

part of society no longer agrees with them, and the economic and social structure no longer corresponds to these attitudes.

The problem of contested ideological foundations of politics is not unique to Ukraine. It is a global phenomenon, as many states move away from traditional party and ideological structuring toward to new political systems in which most parties are focused on electoral results rather than visionary social transformations, are leadership-based, falsely technocratic or, for example, populist, i.e. have a rather vague ideology, a vague understanding of the role of the state, and a vague understanding of the desired social change. However, this global trend is more pronounced in Ukraine. This is due to many transitional processes. For example, the Communist Party no longer has a monopoly on expressing the only correct social truth about the ideological foundations of politics. However, the culture of discussing the role of the state is only developing, and figures who consciously and openly disagree with the given ideological framework are mostly on the margins of political life.

2.3. Debates Around the Concept of “Veteran”

There is no consensus on the fundamental question: who qualifies as **veteran**? Consequently, who should be covered by veteran policy? How should this policy align with the basic definition of a veteran? Currently, there is a clear legislative answer (*War veterans include: combatants, persons with war-related disabilities, war participants*)⁷¹, but it is outdated and partially inconsistent with the existing understanding in society. Some stakeholders emphasise the need to change the legislation on statuses. However, there are many unresolved issues. There are three main points of discussion in the issue of statuses: 1) participation in combat operations, 2) the status of a military personnel, and 3) the specific war in which an individual participated.

In societal perception, those who actively **participated in combat** are considered veterans⁷². However, at the legislative level, there are numerous categories of veterans who did not participate in combat (including most categories of war participants). In addition, there are departmental veterans who become veterans by virtue of their length of service and do not need to have participated in actual combat operations. A separate subtopic in the context of participation in combat operations **is the duration of such participation**. Should the statuses and benefits of these statuses differ depending on how many days someone was involved in combat? Should veterans be divided into different categories depending on the duration of participation in combat?⁷³

Disagreements also extend to the question of when a combatant officially becomes a veteran. The first dimension of this debate is whether an active-duty service member can hold a veteran status. Some stakeholders argue that this should not be the case, as a veteran is someone who has **completed their military service**.

“I always say, separate these two statuses, do not distort the entire Ukrainian legislation. The benefits of a veteran and an active service member are different. We’ve tangled everything together, and this confusion is already causing problems. That is why a veteran is someone who has retired from military service”

71 These three categories, in turn, contain dozens of smaller subcategories.

72 Kostyna Ivona, Halan Liubov, Koliada Oksana, et al. Concept of policy on veterans and their families. 2023.

73 “On Amendments to the Law of Ukraine ‘On the Status of War Veterans and Guarantees of Their Social Protection’ to Streamline the Procedure for Granting Statuses (Categories) to Veterans”: Draft Law of Ukraine of 21.08.2023 No. 9637.

At the same time, there are also directly opposite opinions:

“Although the current Ministry of Veterans is guided by the following logic. A service member who has received the status of a combatant and their family from that moment on begin to enjoy the benefits and guarantees provided for combatants. That is, the lion’s share of those who enjoy the benefits, payments and services provided to veterans are also active service members. This is especially true under current conditions, where most veterans have returned to service and/or have been serving continuously since 2014”

The second perspective: does a person who participated in combat become a veteran after gaining a certain level of experience in combat operations or only after such hostilities have definitely ended?

“When Zelenskyy came to power, he didn’t even understand the problem of veterans. Porokh [Poroshenko] did not understand it either. I remember this phrase from around the beginning of 2015: “What veterans when the war is not over yet?”

The third point of discussion is **the wars in which veterans took part**. Should veterans of, for example, the Second World War or the war in Afghanistan be given the same benefits, instruments and opportunities as those of the Russian-Ukrainian war? A separate sub-topic in this context is the ratio of veterans of the stage of the war that began on 24 February 2022 to veterans of the ATO/JFO. At the level of justice and general moral obligations, all stakeholders agree that they are the same category with roughly the same needs. However, sometimes problems arise due to the practical implementation of plans for future veteran policy.

Possibilities for changing the current veteran policy are limited by the provisions of the Constitution⁷⁴, at least in the form of interpretations of these provisions by the Constitutional Court. One of the ways to bypass these limitations is to create a new status, such as “defender of Ukraine”. This status will come with entirely new benefits (tools/opportunities/privileges, etc.), but it will not include the old ones. At the same time, this status will be mutually exclusive with other statuses, i.e. one will have to **choose whether to obtain the status of combatant or defender of Ukraine**. If we consider this idea in the context of the existing statuses and benefits, the question arises as to those ATO/JFO veterans or even participants in the current phase of the Russian-Ukrainian war who have already received CMB status. It is currently difficult to imagine a mechanism for renouncing this status, however this would mean that veterans who are equal (in terms of justice and morality) would end up with unequal opportunities due to differences in veteran policies.

In fact, the status of “defender of Ukraine” has even begun to be partially introduced into Ukrainian legislation. This is how the category of “deceased defenders of Ukraine” emerged. This resulted in a rather illogical situation where only the deceased are “defenders of Ukraine”, while living veterans who defended Ukraine have a different status and are not defenders of Ukraine. This nominative confusion causes some veterans to feel irritated and incomprehensible from the point of view of justice and morality. However, the decision to introduce a new status remains one of the alternatives, which is seen as a possible solution to the problem of constitutional restrictions on changing the preferential veteran policy.

⁷⁴ These constitutional limitations and possible solutions are described in detail in the Chapter “Constitutional Limitations of Veteran Policy Reform and Possible Solutions”.

The period of 2023 is beyond the scope of this study, however it is worth briefly mentioning draft law No. 9637 of 21.08.2023⁷⁵, which was positioned by the authorities as one of the two key initiatives to change veteran policy in 2023. This draft law, among other things, introduces the concept of “defenders of Ukraine” and their classification into several categories depending on the duration of participation in combat operations. This innovation has caused dissatisfaction among the veteran community⁷⁶, and one of the main points of dissatisfaction is the idea of separating the statuses. This, in turn, clearly underlines the lack of a common, consensual understanding of the concept of “veteran” and the relevance of the problems described above.

Some government officials already use the term “defender of Ukraine” in their rhetoric. Some veterans perceive this as an additional moral responsibility, which can be difficult to fulfil due to health issues:

“Because as soon as we say that all veterans are defenders, we are imposing some responsibilities on them again. [...] There are veterans who are injured and, unfortunately, cannot perform the role of a defender because of their injuries. Yet the state tells them that you are a defender, even when they cannot be. What happens to their mindset in this situation? For example, there are individuals who are warriors - I know a few young men like this – who have been injured and cannot fight. In reality, they would simply pose a risk to their unit. [...] This rhetoric of ‘you must be a defender’ is quite one-sided for a ministry that should understand these nuances”

All these issues surrounding veteran statuses are compounded by another problem that falls outside the scope of this report but deserves at least a brief mention. Full-scale hostilities across Ukraine have meant that there are many categories of people who have either been affected by the war or contributed to the fight against its consequences without being military personnel or directly involved in combat operations: firefighters, power engineers, rescuers, doctors who were involved in dealing with the consequences of rocket attacks very far from the front line; or, for example, garbage truck drivers or utility workers who worked in frontline cities. There are also civilians (with no official status) who engaged in combat in unconventional ways, such as acting as spotters (for the AFU) or saboteurs in the temporarily occupied territories. In relation to these people, there will be a request to grant them some kind of status with some benefits or opportunities. In the crucible of post-war election campaigns, these requests are likely to arise and will be actively articulated by some political forces to gain electoral bonuses. In this case, the same problems will arise as those with veteran statuses: a mismatch between public perception and legislative regulation, ineffective policies based on the distribution of small payments, equalisation of different statuses, difficulties in changing legislation, etc.

2.4. Debates Around Policy Objectives

Another fundamental issue lacking consensus is the overarching goal of veteran policy. At first glance, this question may seem instrumental, but in reality, it is conceptual and fundamental. The stakeholders responsible for developing and finalising the design of veteran policy **do not share a common understanding of its ultimate purpose – why strategies, programmes, and legislative changes need to be developed**. This, in turn, does not contribute to the inclusion of veteran issues on the agenda.

⁷⁵ “On Amendments to the Law of Ukraine ‘On the Status of War Veterans and Guarantees of Their Social Protection’ to Streamline the Procedure for Granting Statuses (Categories) to Veterans”: Draft Law of Ukraine of 21.08.2023 No. 9637.

⁷⁶ Why the draft law on the status of war veterans should be withdrawn: a statement by NGOs // Ukrainska Pravda. 2023.

“The most concerning thing is that... I have a lot of contacts with different government agencies, different ministries and so on [...] they say two things about the Ministry of Veterans Affairs. Either they say nothing, or they say: we don't understand at all why and where they are going, what is happening, and so on. And it's not just people from the public who don't understand, it's deputy ministers, officials in other ministries, and even international partners. If they don't understand their work, when they are constantly communicating at the official level, then what can we say about us, ordinary people?”

Possible options for formulating the goal of veteran policy are quite diverse. They are not mutually exclusive and can be combined to a certain extent. However, in the context of limited resources, any policy, including veteran policy, should be based on the principle of sufficiency, which means that it is not possible to achieve all theoretically possible policy goals at the same time.

The 1993 law as a policy tool does not have a clearly defined goal, but based on the analysis of this law, this goal can be defined as follows: to provide veterans as a socially vulnerable category of citizens with additional social protection. This goal of veteran policy largely persists today, along with the outdated law.

Analysing the in-depth interviews with stakeholders, we can identify several separate ideas/positions regarding the purpose of veteran policy that are circulating in this environment. Some of them are presented below.

Looking at veteran policy through the **prism of defence capability**, its task can be defined as increasing **incentives for military service and participation in combat**. In this case, various material incentives can be quite effective (however, they should have simple and transparent mechanisms for obtaining them). A typical example of the implementation of such an instrument is the provision of access to higher education in the United States for veterans (despite its elitism and, accordingly, high cost).

A slightly different prism of defence capability focuses on the **need to maintain an operational reserve**. The logic of this formulation of the task of veteran policy is to **encourage former service members to return to the army if necessary**. In this case, we are talking more about compensatory mechanisms that will ensure an adequate transition from military to civilian life and vice versa - that is, returning to the military should not mean the destruction of all civilian life. For example, a service member should understand that mobilisation into the armed forces will not destroy their long career path or lead to the closure of the family business.

Another possible goal of veteran policy is **to prevent social upheaval**. Veteran policies built around this goal can take many forms. For example, it could be meeting a minimum request from veterans' organisations to exclude them from the circle of potential protest organisers. Alternatively, it can be active measures to reintegrate veterans so that possible socio-political discontent is not conflated based on veteran status.

A more visionary goal of the veteran policy may be to **form the core of the Ukrainian statehood/nation from veterans**, i.e. to integrate veterans into state structures, both in elected positions and in the civil service. The content of such a veteran policy may include both restrictions on holding public office for non-veterans and training and development of veterans for their rapid co-option into the state apparatus.

Providing veterans with honour and gratitude their contributions can also be a goal of veteran policy. Such a veteran policy, along with clear and high-quality services, should give greater weight to

the intangible, symbolic components (though these symbolic elements could encourage society to express material gratitude as well). This approach, to certain extent, excludes the provision of benefits to veterans, as receiving benefits is considered by some veterans to be *“humiliation, begging for small handouts from the state”* which is considered undignified for veterans.

This is by no means a complete list of possible formulations of the goal of veteran policy. However, a review of even these few formulations shows the principle by which the goal should be formulated: **conceptual clarity and comprehensibility and precision**. Such a goal allows for the engagement of stakeholders and rapid progress through all stages of the policy cycle. Two examples of foreign experience are relevant here. In the United States, the goal of post-Vietnam veteran policy was defined as returning veterans to their pre-army condition (primarily in terms of health). This may not have been an all-encompassing, ambitious goal, but it allowed government officials to develop and implement veteran policies, and veterans could form clear expectations of what they would receive from the state. Another example is the United Kingdom, where there is an official document - a contract between society and veterans. This document creates an understanding of what to expect and what not to expect and allows for the development and adaptation of public policies on this basis⁷⁷. Based on this agreement, the goal of veteran policy can be summarised as follows: respect, support, and fair treatment⁷⁸.

Obstacles to the full cycle of veteran policy begin at the stage of agenda setting. Until 2014, neither veteran policy nor related issues were in the focus of Ukrainian society's attention. In the period 2014-2022, the hostilities were a concern for society, although after 2019, attention to them decreased significantly until 2022. However, this did not lead to the recognition of veteran policy as a separate and important issue. This means that, on the one hand, politicians and public figures have not actively discussed or worked on this issue, failing to articulate these problems to the public. On the other hand, society has not generated a sufficiently strong demand for veteran issues to be in the focus of politicians' attention, reducing their incentives to deal with these topics. Thus, it was more difficult for veteran policy initiatives to get on the agenda of decision-makers.

Controversial conceptual issues also made it difficult to get on the agenda. The difficulty of moving away from post-socialist attitudes to the role of the state in Ukrainian society prevents veteran policy initiatives that do not adhere to post-socialist principles of policymaking from being included in the agenda. Different understandings of the meaning of the term “veteran” and difficulties in the legal aspects of defining this term also prevent the inclusion of veteran issues on the agenda, as, depending on the definition, the number of people who will receive a particular status (and, accordingly, opportunities) may differ significantly. While different understandings of the goal of veteran policy, lack of its conceptual definition, clarity and precision (or at least a common vision) prevent the identification of a specific set of instruments that will have public support both for agenda setting and for promotion by other stages of the policy cycle.

⁷⁷ The Armed Forces Covenant // Ministry of Defence UK.

⁷⁸ Respect, support and fair treatment require veterans' subjectivity. Therefore, achieving these principles is difficult to combine with a paternalistic ecosystem of benefits that de-subjectifies veterans.

3. Policy Development

Once the problem is identified and included in the agenda of decision-makers, the policy design and planning phase begins. A convenient object of analysis at this stage is the developed plans, strategies, concepts and draft laws⁷⁹.

Before proceeding to the analysis of plans, strategies, concepts and draft laws, it is worth making a methodological note. This study did not include a detailed analysis of most of the NLAs (i.e. various instructions, regulations, procedures, etc.), as these documents are aimed at implementing policy, not at developing it. Therefore, it is not appropriate to analyse them through the prism of policy development.

3.1. Governmental Dimension of Policymaking

3.1.1. Government Programmes, Priority Action Plans, Strategies, Concepts, and Target Programmes

At the governmental level, veteran issues emerged in 2014 in the Programme of Activities of the Cabinet of Ministers of Ukraine 2014.⁸⁰ (the government of A. Yatseniuk). At that time, veteran policy was still in the form of social security. Specifically, the Programme lists such permanent activities as financing benefits, issuing certificates, and providing social assistance and medical rehabilitation. The only innovation could be considered the intention **“to approve the *Programme of Social Rehabilitation and Adaptation of the Participants of the Anti-Terrorist Operation (first half of 2015)*”**. **It is this item, the only one, that can be considered as aimed at developing a new policy rather than implementing the existing social protection policy.** Veteran issues were one of the 10 objectives of the new defence policy (outlined in one of the 11 sections of the Programme). Although present, their significance was relatively modest.

The Programme of Social Rehabilitation and Adaptation of the Participants of the Anti-Terrorist Operation was not approved in 2015, instead, the Action Plan on Medical, Psychological, Professional Rehabilitation and Social Adaptation of the Participants of the Anti-Terrorist Operation

⁷⁹ The policymaking process in Ukraine is somewhat different from Western standards. This is especially true in the formal dimension. The classic sequence, especially for Western countries, would be as follows: 1) first, the problem to be solved is identified, then 2) it is put on the agenda, then 3) the process of developing instruments to solve this problem is underway. In Ukraine, this process follows a different sequence. The tools for solving the problem (draft laws) include the stage of problem identification (which is described in the explanatory note). While the stage of agenda setting is divided into several parts. The registration of a draft law itself can be called agenda setting, but then, after registration, the draft law can be included in various work plans of the Verkhovna Rada, for example, in the agenda of a session or the plan of legislative work. In other words, the stages of problem identification, agenda setting, and policy development are intermingled in the context of draft laws. This is worth keeping in mind, as the logic of presenting material according to the policy cycle will also be somewhat shifted due to these peculiarities.

⁸⁰ On the Programme of Activities of the Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine of 11.12.2014 No. 26-VIII.

was adopted⁸¹. This document, as well as the **Action Plan for the Implementation of the Cabinet of Ministers' Programme of Activities for 2015**⁸², declaratively provided for the implementation of the old veteran policy and declared some elements of the new policy, for example, *"Supporting volunteer activities for the rehabilitation and social adaptation of demobilised service members"*. However, the Action Plan for Medical, Psychological, Vocational Rehabilitation and Social Adaptation of the Participants of Anti-Terrorist Operation can hardly be called policy planning in the classical sense. It mainly consists of procedural measures, such as *facilitating, ensuring, coordinating, and implementing*. The content of such measures is often unclear⁸³ – what specific actions should be taken to implement the measure. There are no indicators for the implementation of measures. Most measures lack adequate timeframes - they are planned to be implemented either continuously or without specifying a date of implementation at all. Information on the sources of funding and the amount of such funding is also absent from the Plan. Moreover, the Concept of the State Target Rehabilitation Programme⁸⁴ adopted two years later criticised the existing rehabilitation policy. This criticism and, in fact, the need to adopt a new fundamental policy document in this area two years after the adoption of the Action Plan for Rehabilitation, highlights the low substantive quality of the Plan.

In the 2016 Programme of Activities of the Cabinet of Ministers of Ukraine⁸⁵ (the government of V. Groysman) veteran policy is not mentioned at all. However, in the **Government's Priority Action Plan for 2016**, such references appear⁸⁶. However, veteran issues were not a priority in this plan. It was planned to expand the access of combatants to free legal aid; in the long term (i.e., for an indefinite future), it was planned to address the psychosocial needs of combatants – these were all the measures related to veteran policy in the Government' Priority Action Plan for 2016. When considering these two measures in the context of a 213-page document, one can conclude that there was minimal attention to veteran issues and no plans for veteran policy.

The Government's Priority Action Plan for 2017⁸⁷ also pays minimal attention to veteran issues. The only planned measure is *"Organisation and systematisation of the process of psychological rehabilitation of participants of the anti-terrorist operation"*, which envisages *"the creation of a system of services for psychological rehabilitation of participants of the anti-terrorist operation"* by adopting a Cabinet of Ministers resolution. The remaining 240 pages of the Priority Action Plan for 2017 are

81 On Approval of the Action Plan for Medical, Psychological, Professional Rehabilitation and Social Adaptation of Participants of the Anti-Terrorist Operation: Order of the Cabinet of Ministers of Ukraine of 31.03.2015 No. 359-r.

82 On Approval of the Action Plan for Implementation of the Programme of Activities of the Cabinet of Ministers of Ukraine and the Sustainable Development Strategy "Ukraine - 2020" in 2015: Order of the Cabinet of Ministers of Ukraine of 4.03.2015 No. 213-p.

83 At the same time, it can be assumed that this is being done on purpose for a completely "good" purpose. This can be a "defensive" move against blocking expenditures - the vaguer the wording, the more measures of various formats can be "pushed" under it. After all, if new expenditures are made that were not foreseen in the original plan, each new expenditure area must be prescribed in the order of use of funds - for this purpose, amendments to the CMU Resolution must be made (i.e. from 1 to 4 months just to make the change). And then the internal order must be changed according to the classification of activities and expenditures (up to 1 month). That is why some ministries are trying to give a broad wording to avoid potential conflicts with the Ministry of Finance.

84 On Approval of the Concept of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression by the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation for the Period until 2022: Order of the Cabinet of Ministers of Ukraine of 12.07.2017 No. 475-r.

85 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine of 19.04.2016 No. 1099-VIII.

86 Government Priority Action Plan for 2016: Order of the Cabinet of Ministers of Ukraine of 27.05.2016 No. 418-p.

87 Government Priority Action Plan for 2017: Order of the Cabinet of Ministers of Ukraine of 3.04.2017 No. 275-p.

devoted to other issues. At the same time, it seems rather doubtful that a system of psychological rehabilitation services could be created by adopting a single NLA (although this could be an initial step).

In 2017, the *Concept of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of Anti-Terrorist Operation Participants and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression by the Russian Federation in Donetsk and Luhansk Regions, and Ensure Their Implementation for the Period until 2022*⁸⁸ (hereinafter - the Concept) was adopted. The Concept included a description of the problems, an analysis of their causes, an analysis of options for their resolution, possible timelines and expected outcomes of the programme, and even an estimate (albeit not a very good one) of the resources required to implement such a programme. However, as a Concept, it serves as an analytical document, rather than a policy planning paper. As a policy analysis document, the Concept is quite robust, it identifies most of the problems with the rehabilitation system, many of which remain unresolved.

Moreover, the Concept outlined the issues with the development path of the rehabilitation system that was practiced in veteran policy both before and after the adoption of the Concept, and which, at least partially, continues to be practiced to this day. This approach involves *“adapting the existing system of social protection of the participants of the anti-terrorist operation to their real, actual needs and providing them with medical and rehabilitation assistance. This approach [...] does not resolve systemic problems, as it does not involve changing the principles of organising the system of rehabilitation and readaptation of ATO participants but responding to needs and requests using existing methods and tools.”*

In the Government’s Priority Action Plan for 2018⁸⁹ veterans were mentioned even less frequently than in the previous two plans of the V. Groysman government. Only 2 of the 583 points in this Plan refer to veterans. Specifically, it was planned to conduct media monitoring of the coverage of the situation in the occupied territories and the topic of the heroization of veterans. The MFA was to assist in attracting foreign aid for the treatment of wounded service members.

Thus, as of 2018, veteran policy had not yet been developed, and the government’s **2014-2018 Programmes of Activities contained no such plans**. However, the formation of veteran policy was not limited to only government circles. In 2018, the President, the Verkhovna Rada and civil society jointly decided to form the Ministry of Veterans Affairs⁹⁰, while the Cabinet of Ministers adopted the decision to create it. The Ministry of Veterans was established to address the lack of a new veteran policy. Therefore, even before the change of political leadership, the **Government’s Priority Action Plan for 2019**⁹¹ increased attention to veteran issues: 8 out of 558 items in the Plan concerned veteran policy. In addition to the already fairly standard *“strengthening social protection”* and *“ensuring social rehabilitation”* (those still present in the 2015 Plan), it was planned to **ensure normative regulation of the Ministry of Veterans, and the Veterans Register, improve a number of normative legal acts and even introduce new approaches to the rehabilitation of persons with disabilities**. This Plan already contained specific timeframes. However, the measures, indicators and expected results were

88 On Approval of the Concept of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression by the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation for the Period until 2022: Order of the Cabinet of Ministers of Ukraine of 12.07.2017 No. 475-r.

89 Government Priority Action Plan for 2018: Order of the Cabinet of Ministers of Ukraine of 28.03.2018 No. 244-p.

90 On Issues Related to the Ministry of Veterans Affairs of Ukraine: Resolution of the Cabinet of Ministers of Ukraine of 28.11.2018 No. 986.

91 Government Priority Action Plan for 2019: Order of the Cabinet of Ministers of Ukraine of 18.12.2018 No. 1106-r.

tied to the adoption of legal acts, and their adoption does not automatically mean qualitative changes in veteran policy.

*In December 2018, after the Ministry of Veterans was established, the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Rehabilitation of the Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022 was approved*⁹² (hereinafter - the Programme, the Rehabilitation Programme). This Programme was based on the aforementioned Concept. It had the formal features of a policy document, such as timeframes, performance indicators, sources and amount of funding, etc. The Programme also contained a detailed action plan for its implementation. In other words, **from the point of view of planning, this Programme can be considered the greatest achievement of veteran policy development in its governmental dimension.** Despite the presence of important elements of policy planning, the Programme, as noted in a report by the Accounting Chamber⁹³, had substantive shortcomings in several areas of policy planning instruments, namely:

- ▶ **Problems.** The Programme failed to cover all the problems in the field of rehabilitation (although it could not cover everything in the context of limited resources), meaning that even the implementation of the Programme would have had a limited effect. Accordingly, the objective of the Programme and the planned content of its activities were also limited: *“during the development of the State Target Programme and the definition of its tasks and measures, a comprehensive approach to the issues of rehabilitation and readaptation of the affected participants was not ensured”*⁹⁴.
- ▶ **Indicators.** The audit also revealed that **neither the Ministry of Veterans nor the Ministry of Social Policy had information on the number of veterans in need of various types of rehabilitation and adaptation** during the Programme’s development and subsequent revision (including those related to quantitative indicators of its implementation). Accordingly, despite the formal existence of indicators and performance metrics, *“there was no reasonable definition of planned indicators and expected results of its implementation”*⁹⁵, i.e. **the indicators were aimed not at actually measuring the state of the problem, but at formally meeting the requirements for drafting such documents.** Moreover, the target values for the number of veterans who received rehabilitation services were decreasing during the subsequent amendments to the Programme⁹⁶, although the total number of veterans was increasing.

92 On Approval of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of the Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022: Resolution of the Cabinet of Ministers of Ukraine of 5.12.2018 No. 1021.

93 Some experts are sceptical about the reports of the Accounting Chamber, accusing it of institutional capacity problems and political bias. Nevertheless, we cannot ignore the report of the Accounting Chamber, as the information in the report largely overlaps with other assessments, and the report itself has a great political weight and has become one of the main points of criticism of the work of the Ministry of Veterans.

94 Report of the Accounting Chamber of 06.06.2023 No. 12-5 “On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine”.

95 Report of the Accounting Chamber of 06.06.2023 No. 12-5 “On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine”.

96 It can be assumed that this situation arose because rehabilitation services faced many difficulties (lack of contractors, regulations, etc.), while sanatorium treatment, on the other hand, had a well-established mechanism and “ecosystem” of provision. Therefore, the volume of sanatorium treatment services increased, while rehabilitation services decreased.

- ▶ ***Content of Measures.*** The Programme included some measures that should have been implemented outside the Programme, such measures “are direct functional responsibilities of the authorities as defined in the regulations on their activities and should be implemented without the use of the programme-targeted method within the funds annually approved in the state budget under budget programmes for the maintenance of these authorities. Certain measures of the State Target Programme duplicate tasks and measures implemented under other target programmes”⁹⁷.
- ▶ ***Financial Planning.*** The mechanism of financial planning was also flawed, relying on incorrect and, in fact, unlawful⁹⁸ logic: “The funding needs outlined in budget requests for 2019–2022 for providing social and professional adaptation services to affected participants (UAH 127. million) did not match the planned expenditure amounts approved in the State Target Programme (UAH 110.4 million) and were not supported by proper justifications, as it was calculated not by multiplying the potential number of affected participants (service recipients) by the average estimated cost of the service, but by dividing the maximum amount of expenditures approved by the Ministry of Finance for the respective year. Consequently, an approximate number of potentially affected participants (service recipients) was determined”⁹⁹.

A significant shortcoming of this Programme and its implementation system was the absence of any mention of the Ministry of Veterans, even though at the time of its adoption, Iryna Friz has already been serving as the Minister for Veterans Affairs for several weeks. However, the Programme did not reference this Ministry at all. Instead, the Programme was to be coordinated by the Ministry of Social Policy, in particular through the State Service for War Veterans and Participants of the Anti-Terrorist Operation, while the Ministry of Veterans was responsible for developing veteran policy. This created a situation **where the broader government plans for veterans (as outlined in the Priority Action Plan) were to be implemented by the Ministry of Veterans, while the Programme in this area was to be implemented through the Ministry of Social Policy.** Coordination between these ministries, at least at the level of the Programme, was not planned.

In March 2019, the last veteran policy planning document under the Groysman government was adopted. This was the Action Plan for 2019, and the subsequent years aimed at ensuring the development of physical and sports rehabilitation of combatants who participated in the anti-terrorist operation, in measures to ensure national security and defence, repelling and deterring the armed aggression of the Russian Federation in Donetsk and Luhansk regions¹⁰⁰. This plan contained a range of measures for physical and sports rehabilitation, namely, it was planned to develop and approve programmes for physical and sports rehabilitation, determine which sports facilities would be used for rehabilitation, train specialists and improve their skills (with the involvement of veterans with disabilities) and subsequently conduct physical and sports events, as well as participate in international competitions.

97 Report of the Accounting Chamber of 06.06.2023 No. 12-5 “On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine”.

98 Failure to comply with the requirements of Article 7 of the Budget Code of Ukraine in terms of compliance with the principle of justification, which stipulates that the budget must be formed based on realistic calculations of budget expenditures conducted in accordance with approved methods and rules.

99 Report of the Accounting Chamber of 06.06.2023 No. 12-5 “On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine”.

100 On Approval of the Action Plan for 2019 and Subsequent Years Aimed at Ensuring the Development of Physical and Sports Rehabilitation of Combatants Who Participated in the Anti-Terrorist Operation, in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions: Order of the Cabinet of Ministers of Ukraine of 20.03.2019 No. 168-r.

Among the advantages of this Plan are the relatively detailed list of executors and the existence of at least a minimal intention to monitor the implementation of the Plan. However, there were more drawbacks: the Plan was not based on a broader policy document that would describe the problems to be solved in this area, the means to solve these problems, and the goals to be achieved as a result of such a solution. The financial part of the Plan was limited to the standard wording “*at the expense and within the limits of expenditures of the state and local budgets, as well as other sources of funding not prohibited by law*” and did not contain calculations of the amount of funds required to implement the measures, nor of their sources (if it is exclusively budgetary funds, under which budgetary programmes the funding will be provided, what will be financed from the state and what from local budgets). With two exceptions, there were no specific deadlines for the implementation of the measures (the measures were planned to be implemented continuously or annually). There were also no performance indicators (as well as baseline and target quantitative indicators). Therefore, this Plan can be considered more of a declaration of intent, just like some other veteran policy planning documents.

In 2019, the government led by O. Honcharuk also devoted a lot of attention to veterans in its Programme of Activities¹⁰¹ However, at that time, the Ministry of Veterans had already been merged with the Ministry of the Temporarily Occupied Territories. The 2019 Programme was quite special in terms of the Ukrainian tradition of preparing such documents: veteran policy was finally included in the block of activities of the Ministry of Veterans and Temporarily Occupied Territories. This block, in turn, was divided into three objectives, two of which were related to veterans: 1) integration of veterans into civilian life, and 2) ensuring respectful treatment of veterans.

The 2019 Programme contained the following proposals for reforming veteran policy: the introduction of veterans’ spaces and a single window, the provision of online services and psychosocial adaptation services, etc., although it omitted the area of physical and sports rehabilitation (probably due to the lack of political priority), which was envisaged in the relevant Action Plan adopted in March 2019. However, the 2019 Programme did not contain any specific indicators of achievement of the objectives or timeframes for their achievement. There was also no clear algorithm for implementing advanced ideas for reforming veteran policy, including sources of funding and information about the implementers. Thus, the 2019 Programme was more of a declarative vision than a policy planning document.

Finally, in October 2019, nearly a year after its approval, the State Target Programme for Medical, Physical Rehabilitation and Psychosocial Readaptation was revised¹⁰². While its content was not significantly updated, some important changes were introduced. Firstly, responsibility for its implementation was assigned to the body tasked with formulating veteran policy—the Ministry of Veterans (at that time still operating as a merged ministry). Secondly, it was extended by a year - until 2023, effectively shifting all planned activities by one year.

The 2020 Government Programme of Activities¹⁰³, like O. Honcharuk’s 2019 Programme, contained a separate block dedicated to veterans and grouped according to the competence of the Ministry of Veterans. The Programme envisaged the implementation of three key blocks: **1) Recovery and full life, 2) Memory and respect, 3) Reintegration into society**. In addition to the activities developed in the previous period, the 2020 Programme contained several new directions: sports rehabilitation, needs monitoring, social support standards, business opportunities, mobile groups (to provide services to veterans in remote areas), etc., as well as quite specific quantitative indicators of achievement

101 Programme of Activities of the Cabinet of Ministers of Ukraine. 2019.

102 On Amendments to the Resolution of the Cabinet of Ministers of Ukraine of 5 December 2018 No. 1021: Resolution of the Cabinet of Ministers of Ukraine of 12 October 2019 No. 877.

103 Programme of Activities of the Cabinet of Ministers of Ukraine, June 2020.

(at least some of the areas had such indicators). However, once again, no timeframe for achieving these objectives was defined. Indicators and timeframes were contained in the Government's priority action plans, for example, the plan for 2020¹⁰⁴. In other words, **the 2020 Priority Action Plan** had almost all the formal features of a policy planning document (except for the financial part). Compared to most previous programmes and plans, this was a great achievement. At the same time, a significant part of the 2020 Plan was based on the old regulatory framework and did not provide for an update of the legislative framework for veteran policy. Accordingly, no systemic changes in veteran policy (changes in approach) were planned.

The Government Priority Action Plan for 2021¹⁰⁵ devoted even more space to veterans: 30 out of 797 points were related to veteran issues and were combined into a separate block under the coordination of the Ministry of Veterans. This plan, like the plan for the previous year, was quite good from a formal point of view: it contained prescribed measures, indicators of their implementation, and deadlines, although, like the previous one, it did not describe the resources needed to implement the plan. The 2021 plan had a rather rich substantive component. In addition to such traditional plans as, for example, the development of psychological assistance and the provision of sanatorium treatment, many new things were planned: 1) a set of measures for the development of veteran sports, 2) new measures for the provision of housing, 3) a package of digital measures (registers, electronic certificates, mobile application), 4) measures in the field of veteran business and employment, 5) new measures for institutional support of veteran policy (introduction of a comprehensive review of the social protection system, creation of the Ukrainian Veterans Fund, introduction of the position of a veteran ombudsman).

In 2021, another policy document was approved - *the Action Plan for 2021-2025 on the implementation of the National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Deceased (Fallen) War Veterans*¹⁰⁶. This Plan was approved in pursuance of a rather non-standard document by its origin - the Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of Veterans, which was approved by a presidential decree instructing the government to develop a plan for its implementation (in general, since September 2019, the President has been actively involved in the process of political prioritisation of the executive branch). At the same time, the Strategy itself was partially based on the Government's 2019 Action Plan for Physical Culture and Sports Rehabilitation. Accordingly, the 2021 Action Plan also partially included what was in the 2019 Action Plan. Comparing the 2019 and 2021 Plans, the following areas of action were added to the 2021 Plan: the establishment of a management system, the introduction of a system of mobile consultants, and the introduction of comprehensive diagnostics and rehabilitation examinations. Returning to the correlation between the Strategy and the 2021 Action Plan: some elements of policy planning were present in the Strategy - a description of problems and general objectives. The 2021 Action Plan, on the other hand, contained some other elements - it detailed the distribution of specific tasks among the implementers, provided for a monitoring mechanism, and for some of the measures, adequate deadlines were specified. However, some elements for policy planning were missing or were of poor quality. The Plan lacked adequate detailed calculations on the amount and sources of its funding¹⁰⁷. In addition, there was an

104 Government Priority Action Plan for 2020: Order of the Cabinet of Ministers of Ukraine of 9.09.2020 No. 1133-p.

105 Government Priority Action Plan for 2021: Order of the Cabinet of Ministers of Ukraine of 24.03.2021 No. 276-p.

106 On Approval of the Action Plan for 2021-2025 for the Implementation of the National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Deceased (Fallen) War Veterans: Resolution of the Cabinet of Ministers of Ukraine of 30.06.2021 No. 667.

107 The phrase "implementation of the action plan approved by this resolution at the expense of the state and local budgets within the limits of expenditures provided for executive authorities for the relevant year, and at the expense of other sources of funding not prohibited by law" cannot be considered financial calculations. In addition, unlike the State Target Rehabilitation Programme, the Action Plan did not specify the budget programme under which the funding was to be provided.

issue with indicators. Only a part of them, related to the development and/or adoption of documents (e.g., NLAs or methodological guidelines), had a specific dimension that allows for clear tracking of the level of efficiency and effectiveness. In most other cases, the performance indicators were mostly not quantified. For example, the indicator “acquisition of necessary rehabilitation equipment, including sports equipment” has neither a baseline nor a desired level, when the amount of acquired property would be sufficient to consider specialised medical institutions of Ukraine as having rehabilitation equipment, including sports equipment.

*The Concept of the State Target Social Programme for Ensuring the Exercise of the Right to Housing for Persons Who Defended the Independence, Sovereignty and Territorial Integrity of Ukraine for the Period up to 2025*¹⁰⁸ was also approved in 2021. The concept focused on describing the problems with the realisation of the right to housing for veterans and the tasks to solve these problems. The main challenges in providing veterans with housing were identified as their limited financial capacity to participate in existing housing programmes and insufficient state funding for such programmes. This all boils down to outdated approaches to this policy and the lack of a comprehensive approach. The algorithm for solving these problems was to identify the needs of communities, introduce a new housing system, and then finance it. The drawback of the Concept as a policy planning document was the absence of important policy planning elements. These include detailed calculations of the amount and sources of funding, allocation of tasks among implementers, timelines, monitoring measures and indicators with quantitative benchmarks (although there was one indicator formulated as an expected result - it was planned that more than 5,000 veterans would receive housing). Of course, this was a Concept, not a full-fledged document to be implemented; perhaps this would have been corrected when the Programme itself was developed.

Thus, governmental planning of veteran policy can be divided into two stages - before and after the creation of the Ministry of Veterans. Already in 2014, the government of A. Yatseniuk included veteran policy in its Programme, and it was present in almost all government policy planning documents since 2014 (the only exception is the Programme of the government of V. Groysman in 2016, although the Priority Action Plan for 2016 contained veteran issues). Although there was some planning of veteran policy in 2014-2018, its scope and quality were low (this is a government-wide problem). Government-wide policy planning documents of that time devoted less than 1% of their volume to veteran policy, which speaks volumes about the political priority of this area in government planning and the lack of political will to prioritise veteran policy at the national level. In addition, the policy planning documents of that time did not contain adequate timeframes, performance indicators or financial components. Therefore, even from a formal point of view, these documents are not plans, but rather declarations (again, this is a government-wide problem).

Since 2019, when the Ministry of Veterans was established, the situation with planning has been improving. The creation of the Ministry of Veterans allowed the Cabinet of Ministers to systematically “see” veteran issues, as the Cabinet of Ministers’ programmes of activities and annual priority action plans were structured in line with the existing ministries. Both the 2019 and 2020 Cabinet of Ministers’ Programmes of Activities and the Priority Action Plans contained separate and sometimes quite large sections on veteran policy, which were to be developed and implemented by the Ministry of Veterans (including during the period of its merger with another ministry). The constitutionally mandated policy documents, such as the 2019 and 2020 Programmes of Activities of the Cabinet of Ministers, had some formal shortcomings: they lacked timeframes, financial calculations, and sometimes even indicators of achievement. Timeframes and indicators were available in the Priority Action Plans for 2020 and 2021, although these plans did not contain a financial part. In terms of content, both the

108 On Approval of the Concept of the State Target Social Programme for Ensuring the Exercise of the Right to Housing for Persons Who Defended the Independence, Sovereignty and Territorial Integrity of Ukraine for the Period until 2025: Order of the Cabinet of Ministers of Ukraine of 9.06.2021 No. 618-r.

Cabinet of Ministers' Programmes of Activities and the Priority Action Plans have been improving since 2019, with an increase in the number of problems to be solved and more realistic measures to address them. In particular, the Priority Action Plan for 2021 envisaged measures to address most of the problems of veteran policy and even contained plans to build institutions involved in the implementation of veteran policy.

The Programmes of Activities of the Cabinet of Ministers and Priority Action Plans are government-wide planning documents. Instead, more specific, detailed measures should be planned and implemented at a different level - through specific strategies and target programmes by area. While general planning of veteran policy in one form or another was almost always present, there were problems with planning by area. In fact, the only document of this nature was the State Target Programme for Medical, Physical Rehabilitation and Psychosocial Rehabilitation, adopted at the end of 2018. However, it had a significant drawback: for almost the entirety of 2019, this Programme ignored the existence of the body that was supposed to formulate veteran policy - the Ministry of Veterans. Only at the end of 2019 was this flaw corrected. However, this was the only such document. Others were either not developed at all or remained at the draft stage¹⁰⁹, such as the Draft Strategy for the Development of Entrepreneurial Initiatives of War Veterans¹¹⁰. That is, there was no planning at the government level in most areas of veteran policy.

3.1.2. Budget Planning

In parallel to government-wide planning, there is a tool of budget programmes. *A budget programme is a set of measures aimed at achieving a single goal, tasks and expected result, the definition and implementation of which is carried out by the budgetary authority in accordance with the functions assigned to it* (clause 4, part 1, Article 2 of the Budget Code)¹¹¹. The planning of activities within the budget programme is carried out using the budget programme passport - *which defines the purpose, tasks, areas of use of budget funds, responsible implementers, performance indicators and other characteristics of the budget programme in accordance with the budget allocation established by the law on the State Budget of Ukraine (local budget decision) and the goals of state policy in the relevant field of activity* (clause 40, part 1, Article 2 of the Budget Code)¹¹².

The Ministry of Veterans was responsible for the preparation of passports and the implementation of budget programmes No. 1501010, No. 1501030, and No. 1501040¹¹³.

109 In this study, we did not conduct a detailed analysis of unregistered draft documents that are at the stage of preliminary approval or consultation. Evaluating such a document in terms of how well the planning was done (how well the policy was developed) has a significant methodological flaw - the evaluation of an incomplete document. Any criticism of such a document will be limited to arguments such as "if this document had reached the final stage, all these comments would have been taken into account" or "it is because of these comments that this document was not adopted". At the same time, we analyse documents that are approved plans and do not provide for implementation because of their adoption (they are supposed to be implemented after another document is approved). This is, for example, the Concept of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of ATO Participants.

110 Draft Strategy for the Development of Entrepreneurial Initiatives of War Veterans // Ministry of Veterans Affairs.

111 Budget Code of Ukraine: Law of Ukraine of 01.01.2024 No. 2456-VI.

112 Budget Code of Ukraine: Law of Ukraine of 01.01.2024 No. 2456-VI.

113 Here and further in this study, the analysis only includes programmes from 2019 onward. Before that, there were other budget programmes, which can be reviewed, for example, here: The state of implementation of budget programmes on social protection of participants of the war of Ukraine against Russian aggression. Analytical report // Yurydychna Sotnia. 2018. The creation of the Ministry of Veterans was intended to address at least some of the shortcomings identified in the analysis of budget programmes that existed before 2019.

Programme No. 1501010 financed the general activities of the Ministry of Veterans. The planned funding¹¹⁴: was as follows: UAH 43,823,800 for 2019, UAH 130,583,000 for 2020, and UAH 130,043,900 for 2021.

Programme No. 1501030 funded the activities of veterans' NGOs (project competitions). The planned funding was as follows: UAH 9,001,000 for 2019, UAH 2,306,000 for 2020, and UAH 4,960,200 for 2021.

Programme No. 1501040 financed the implementation of the State Target Programme for Reintegration. The planned funding was as follows: UAH 112,679,600 for 2019, UAH 216,914,900 for 2020, and UAH 248,408,400 for 2021.

Programmes No. 1501010, No. 1501030 and No. 1501040 for the years 2019-2021 had numerous shortcomings, primarily related to policy development. The analysis of Programme No. 1501040 will be limited here, with greater focus placed on Programmes No. 1501010 and No. 1501030, as a detailed review of Programme No. 1501040 has already been conducted by the Accounting Chamber, excerpts of which are provided in the Chapter "Financing and Use of Funds to Implement the Veteran Policy".

The output indicators of the programme product cannot 100% ensure the achievement of the policy objectives and goals of most programmes.

The programme No. 1501010 for 2019 envisaged the fulfilment of the state policy objective: *"ensuring effective state social support for war veterans and members of their families, returning them to a full-fledged peaceful life, reintegration of IDPs into the contemporary Ukrainian space"*. This goal was to be achieved through the preparation of 7 NLAs (of uncertain content and type), participation in 49 meetings of VRU committees, processing of 21,315 pieces of correspondence, and 2 collegial meetings. The cost indicators of this programme were the number of full-time employees of the Ministry of Veterans, the number of official cars, the number of official business trips, and the number of individuals granted a CMB status and included into the register. **These indicators are a striking example of the common practice of setting procedural indicators that do not have the ultimate goal of changing policy, instead reflecting the planned internal workflows of the Ministry of Veterans.**

Programme No. 1501010 for 2020 provides an even clearer demonstration of the disconnect between the policy goal, the programme's objectives, and its content (indicators). Due to reorganisation and personnel changes at the Ministry of Veterans and changes in the Cabinet of Ministers, the original programme passport was amended four times. In particular, **the policy goals that the programme was supposed to achieve changed, but the programme's objectives and performance indicators remained almost unchanged.** Moreover, despite the different policy goals, the programme's objectives and performance indicators have hardly¹¹⁵ changed compared to the programme No. 1501010 of 2019.

Programme No. 1501010 for 2021 is interesting for the possibility of comparing governmental and non-governmental planning tools. In September 2021, the programme's passport was amended to include new indicators for the MARTA software, the expansion of the information and telecommunications systems of the veterans' registry, and the online platform for supporting veterans' initiatives, G2VEI. These indicators specifically defined what product would be created, and this product was directly linked to the achievement of the policy goals, purpose and objectives of the programme.

¹¹⁴ If changes were made to the budget programme passport during the year, the amount in the latest version is given here.

¹¹⁵ The only significant change among the performance indicators is the addition of the indicator "number of created veteran spaces".

MARTA, G2VEI, and the creation of the Unified Register of War Veterans are international technical assistance (ITA) projects. The indicators set by the ITA thus stood out against the background of aggregated procedural indicators of government work.

Programmes No. 1501030 for 2019-2021 included different policy objectives: *creation of favourable conditions for the formation and institutional development of civil society organisations* (2019); *Veterans and members of their families receive respectful treatment in society* (2020); *Memory and respect* (2021). The objectives of these programmes were also different. At the same time, the tasks and measures (performance indicators) were almost identical. These indicators included: the number of projects/events/programmes implemented by veterans' associations or the Ministry, the number of people who participated in these events. Although the quality indicators of these programmes have changed over time: the 2019 indicator "*share of funds spent by organisations on activities and institutional development*" was added to the indicator "*share of the population of Ukraine with a positive attitude towards veterans*" in 2020, and in 2021, these quality indicators were replaced by the indicator "*increase in the number of programmes and activities compared to the previous year*". It is rather doubtful that the planned measures (product performance indicators) can significantly affect the achievement of the policy goal, programmes objectives or even quality indicators. It is an open question to what extent commemorations really have a significant impact on the public's respect for veterans or the institutional development of veterans' associations. Both the changing policy goals and objectives of the programmes with unchanged tasks and indicators, and the questionable compliance of the content of the activities with the programme objectives and policy goals show that even at the policy planning level, ensuring the achievement of the policy goals of these budget programmes is quite challenging.

The level of performance of the output indicators of the product does not affect the quality of the product, the achievement of the policy goal and the programme objective. In other words, the achievement of the policy goal or programme objective does not depend on the implementation of the measures.

Programme No. 1501030 for 2020 was amended several times during 2020, resulting in an **eightfold** decrease in its funding (the decrease was due to the COVID-19 pandemic). The product's performance indicators have also decreased: fewer veterans' associations received financial support, fewer events/projects/programmes were held, and fewer participants took part in them. However, the main quality indicator - *the share of the Ukrainian population with a positive attitude towards veterans* - did not change. **According to the programme implementation report, in 2020, despite a radical reduction in funding and results volume, the policy goal, programme objective, and quality indicator were fully achieved and fulfilled.** A similar situation occurred with the number of participants in events/programmes/projects organised by veterans' associations: in 2020, **30 times fewer people** took part in these events compared to 2019, yet **the identical objectives of the programmes in 2019 and 2020 were achieved.** From this we can conclude that the implementation of the activities (achievement of results) of this budget programme has no impact on the policy goal, programme objective, or quality indicator. All of them are achieved regardless of the implementation of measures (the achievement of product performance indicators and corresponding funding). This already indicates the unnecessary nature of such a programme (or at least the unnecessary extent of its funding), as its results are achieved on their own (the main flaw causing this situation is the wrong logic behind policy formulation).

Programme No. 1501030 for 2021 repeated the story of the previous one for 2020, only on a smaller scale. Over the course of the year, the planned amount of funding decreased by 40%, and some of the planned performance indicators (e.g., the number of participants in events organised by veterans' associations) were reduced by two-thirds. According to the report, even this reduced funding plan was only half implemented (half of the already reduced planned volume was not actually financed). The planned reduced performance indicators were also not achieved by half in some cases. Neverthe-

less, **both the policy goal and the programme objective, according to the report**, were met, which highlights the flawed logic of designing such budget programmes.

Policy planning is carried out using procedural indicators (performance indicators of budget programmes), which are unpredictable or unrealistic.

The Programmes No. 1501010 for 2019-2021 used the indicator “*Number of individuals who received the status of combatants and were entered into the Unified Register of Participants of the Anti-Terrorist Operation*” as one of the key performance indicators. The actual performance of this indicator usually did not match the plan (even the revised one): in 2019, 8,885 fewer people than planned received the CMB status (under-performance of the plan by 2.3%); in 2020, 17,408 more people than planned received the CMB status (over-performance of the plan by 176%); and in 2021, 25,072 more people than planned received the CMB status (over-performance of the plan by 281%). Of course, this is due to many factors, primarily the unpredictable nature of the JFO. The unpredictable nature of this indicator and the systematic deviation of its actual performance from the planned level demonstrate the procedural nature of this indicator, as well as the lack of a system for collecting performance indicators for budget programmes that would be tied to the needs of veterans.

Another example concerns the “*number of normative legal acts developed*”. In 2019, 18 more NLAs were developed than planned (257% over-performance); in 2020, 15 more NLAs were developed than planned (71% over-performance); in 2021, 40 more NLAs were developed than planned (400% over-performance). The aggregated nature of this indicator, where the NLAs can differ in content, type and level, as well as the systematic overachievement of the indicator, indicates the procedural nature of such planning, as well as the shortcomings of the budget planning system, which requires constant amendments to programme passports throughout the year.

3.2. The Presidential Dimension of Policymaking

The President of Ukraine is undoubtedly one of the key policy makers¹¹⁶ Both P. Poroshenko and V. Zelenskyy (with their teams in the Presidential Administration/Office of the President) have been involved in the development of veteran policy. There are both formal and informal aspects to this. The Cabinet of Ministers is accountable to the President, and the President nominates the Prime Minister. The President is also a subject of legislative initiative. P. Poroshenko had a large faction in Parliament, which was the core of the coalition, while V. Zelenskyy has, as of 2024, a mono-majority, a faction with coalition rights. It is also important to remember the special role of the President in defence policy: this includes the role in appointing the Minister of Defence and a range of powers directly related to the management of the AFU. Accordingly, defence policy is considered to be the President’s sphere of influence, while veteran policy is closely linked to defence policy. Given this, the President has a fairly wide range of formal and informal means of influencing veteran policy. He bears a significant share of both formal and informal responsibility for veteran policy. Therefore, when reading about the actions of the Cabinet of Ministers and some MPs, it is worth remembering the President’s influence and responsibility. However, the President was also directly involved in the veteran policy through the issuance of decrees¹¹⁷ and registration of draft laws, which will be analysed below. A total of 22 Presidential decrees¹¹⁸ related to veteran policy in 2014-2021 were analysed.

116 The President is one of the key policy makers and stakeholders in setting political priorities and shaping veteran policy.

117 Decrees related to individuals (e.g., awards or other symbolic events) were not included in the analysis. Some decrees contain instructions to finance the activities envisaged by them, while others do not.

118 Some of the decrees concerned holidays or specific personnel appointments, and therefore are not mentioned in the text below.

3. POLICY DEVELOPMENT

In Decree No. 835/2014¹¹⁹ P. Poroshenko instructed the Cabinet of Ministers to take a few steps to provide social protection to some veterans. The focus was on social protection of members of volunteer battalions and on the education of veterans and their children (admission to higher education institutions and payment for such education at the expense of the budget).

In Decree No. 140/2015¹²⁰ the President enacted the NSDC decision on the property of medical institutions. According to this decision, the Cabinet of Ministers was tasked with conducting an inventory of healthcare facilities (including hospitals and sanatoriums) in order to direct military personnel and veterans there for treatment.

In Decree No. 150/2015¹²¹, the President gave instructions not only to the Cabinet of Ministers, but also to regional state administrations. The issues addressed by the Decree included: granting the CMB status, providing housing, introducing medical examinations, engaging physical rehabilitation specialists, increasing treatment costs, providing psychological assistance, approving a rehabilitation and adaptation programme (the same item was in the Government Programme of Activities of 2014), engaging social services to support veterans' families, creating a CMB register, introducing a "one-stop shop" principle, servicing loans, processing unemployment benefits, and engaging volunteers.

Decree No. 123/2018¹²² launched the President's involvement in the field of sports rehabilitation. The Cabinet of Ministers and regional state administrations were required to implement this Decree. Specifically, it envisaged the following: providing wounded veterans with prostheses and orthoses, preparing and implementing sports rehabilitation programmes, international cooperation, holding conferences, and attracting international technical assistance projects.

In 2020, a Decree was issued that contained the most elements of a classic policy document among the Presidential decrees - the National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans¹²³. It included a description of the problems, objectives, expected results, timeframes and monitoring measures. The Strategy envisaged multifaceted measures to implement physical education and sports rehabilitation, including the creation of infrastructure, training of specialists, interaction between different actors, etc. At the same time, the Strategy as a policy planning document also had shortcomings: almost complete lack of information on the amount and sources of funding¹²⁴ and the distribution of tasks among implementers, and performance indicators had no quantitative measurement (neither the baseline nor the target levels). Some of the tasks for implementing the Strategy were quite abstract: "to promote...", "to develop cooperation...", "to stimulate...". They could have been specified at the level of the Action Plan, but this did not happen. The Presidential Strategy was partially based on the Government's 2019 Action Plan for Physical Culture and Sports

119 On Urgent Measures to Ensure Additional Social Guarantees for Certain Categories of Citizens: Decree of the President of Ukraine of 29.10.2014 No. 835/2014.

120 On the Decision of the National Security and Defence Council of Ukraine of February 18, 2015, "On Measures to Create Adequate Material and Technical Facilities for the Treatment, Rehabilitation, and Recovery of Military Personnel and Other Persons Directly Involved in the Anti-Terrorist Operation, Its Support, as well as Combat Veterans and War-Disabled Persons": Decree of the President of Ukraine of 12.03.2015 No. 140/2015.

121 On Additional Measures for Social Protection of Participants of the Anti-Terrorist Operation: Decree of the President of Ukraine of 18.03.2015 No. 150/2015.

122 On Supporting the Development of the Sports Rehabilitation System for Combat Veterans Who Participated in the Anti-Terrorist Operation and Activities to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions: Decree of the President of Ukraine of 12.05.2018 No. 123/2018.

123 Issues of Development of the National System for Physical and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans: Decree of the President of Ukraine of 23.08.2020 No. 342/2020.

124 This contrasts with the State Target Rehabilitation Programme, which explicitly stated the budget programme under which funding was to be provided.

Rehabilitation, which also included measures to unify rehabilitation programmes/methodology, use existing sports infrastructure, train rehabilitation specialists, international cooperation, and engage veterans in sports and active lifestyles. Among the significant innovations envisaged by the Strategy were the following: the creation of a management system, the introduction of a system of mobile consultants and the introduction of comprehensive diagnostics and rehabilitation examinations. The development and approval of the Strategy for veteran policy areas by the President of Ukraine, under the existence of the Ministry of Veterans, raises questions regarding the delineation of competencies and areas of responsibility in the planning of veteran policy.

Presidential Decree No. 466/2021¹²⁵ concerned housing policy. The President instructed the Cabinet of Ministers to allocate funds to the State Budget for compensation for eligible housing, as well as to approve the State Target Social Programme for Ensuring the Right to Housing for Persons Who Defended the Independence, Sovereignty and Territorial Integrity of Ukraine for the Period Until 2025. This Decree is a clear example of how the President delegates to the Cabinet of Ministers tasks that are within its authority, with the Cabinet being responsible for determining the implementation methods. Of course, this does not mean that the President did not agree with the Cabinet (or at least consult) with them beforehand.

By Decree No. 532/2021¹²⁶, the President instructed the Cabinet of Ministers of Ukraine, regional and Kyiv city state administrations to ensure the establishment of regional centres for medical care and psychological rehabilitation of service members and war veterans in each region by the end of 2023.

By Decree No. 536/2016¹²⁷, the President began to create subordinate structures for war veterans, which enabled the institutionalisation of presidential influence on the executive branch in the field of veterans' affairs. This decree introduced the position of *the Presidential Commissioner for Rehabilitation of Participants of the Anti-Terrorist Operation Who Sustained Injuries, Concussions, Disabilities or Other Disease During Participation in the Anti-Terrorist Operation*. These powers were consultative in nature: monitoring the situation, making recommendations, providing information, establishing interaction, etc. Vadym Svyrydenko, a veteran who was injured during the battles near Debaltseve, was appointed as the Commissioner for these issues. Later, in 2018, this position was abolished and replaced with a new one – *Presidential Commissioner of Ukraine for the Rehabilitation of Combatants*¹²⁸. Vadym Svyrydenko was also appointed to this position. His powers remained largely the same: monitoring, consulting and making proposals. In 2019, V. Zelenskyy again appointed Vadym Svyrydenko to the same position¹²⁹. In 2021, the title of the position was slightly changed: *Advisor – Presidential Commissioner of Ukraine for the Rehabilitation of Combatants*¹³⁰.

Subsequently, the presidential structures for war veterans were supplemented by the establishment in 2020 of the Advisory Council for War Veterans and Families of Fallen (Deceased) Defenders of

125 On Certain Measures Regarding the Social Protection of War Veterans, Families of the Deceased Who Defended the Independence, Sovereignty, and Territorial Integrity of Ukraine: Decree of the President of Ukraine of 11.09.2021 No. 466/2021.

126 On Certain Measures to Ensure Social Guarantees for Military Personnel and War Veterans: Decree of the President of Ukraine of 13.10.2021 No. 532/2021.

127 On the Presidential Commissioner of Ukraine for the Rehabilitation of Participants of the Anti-Terrorist Operation Who Sustained Injuries, Concussions, Disabilities, or Other Disease During Participation in the Anti-Terrorist Operation: Decree of the President of Ukraine of 01.12.2016 No. 536/2016.

128 On the Presidential Commissioner of Ukraine for Rehabilitation of Combatants: Decree of the President of Ukraine of 22.11.2018 No. 386/2018.

129 On the Appointment of V. Svyrydenko as the Presidential Commissioner of Ukraine for Rehabilitation of Combatants: Decree of the President of Ukraine of 23.05.2019 No. 319/2019.

130 On the Appointment of V. Svyrydenko as the Advisor - Presidential Commissioner of Ukraine for Rehabilitation of Combatants: Decree of the President of Ukraine of 15.06.2021 No. 246/2021.

Ukraine¹³¹. Its powers¹³² also were of a consultative-advisory nature: analysing problematic issues and preparing proposals for their solution. In 2021, another advisory body was established - the Advisory Council on Ensuring the Rights and Freedoms of Defenders of Ukraine¹³³. Its powers can also be described as analysing problems and preparing proposals for their resolution.

What unites all these decrees is the President's intended recipients. Almost all of them (except for the creation of advisory bodies) are directed to the Cabinet of Ministers of Ukraine, and sometimes even regional state administrations. The President (both V. Zelenskyy and P. Poroshenko) "*decreed*" that the Cabinet of Ministers should develop certain draft laws, include specific expenditures in the state budget proposal, address certain issues, and so on. Often, these are matters already included in the government's own plans. It is quite difficult to determine how much such presidential decrees affect the work of the Cabinet of Ministers.

In general, presidential decrees have a rather ambiguous status in the Ukrainian legal system. The Constitution does not provide an exhaustive list of entities and areas to which decrees can be addressed. From a legislative perspective, failure by the Cabinet of Ministers to implement such decrees has no legal consequences. Therefore, the fact that the President instructs the Cabinet to do something is more of a reflection of the informal political influence of the President on the government. Perhaps this feature explains many of the shortcomings of these decrees as policy planning documents.

The main disadvantage is the unclear nature of the impact of the decrees on the implementation of veteran policy, both in terms of mandatory nature and rather abstract wording ("to study the issue" or "to develop a draft law"). This is probably why such decrees (with few exceptions) lacked specific executors or deadlines for implementation (with few exceptions). Calculations on the amount and sources of funding were also absent from the decrees. Similarly, there was no information on performance indicators, including the specific value by which progress in implementation would be measured, the baseline for such a value, and the level at which the goal of a document would be considered achieved¹³⁴. The decrees also did not provide for measures to monitor their implementation, although it would still be difficult to monitor without performance indicators. Given the nature of the decrees, it is not surprising that they did not include the problem analysis. The only exception was the Strategy for Physical Culture and Sports Rehabilitation: it was much more of a policy planning document than the other decrees, although it had some shortcomings.

Regarding the thematic focus of the presidential decrees, they, on the one hand, covered a fairly wide range of areas of veteran policy: healthcare, psychological assistance, rehabilitation (including physical education and sports), education, and housing. Among the important areas that were missing, one could mention issues of transition from military service to civilian life, employment and entrepreneurship. However, the planning of the presidential veteran policy was not very systematic or consistent. If the President did issue a decree on a particular topic, it was almost always a single issue that was not addressed in other decrees. This is partly due to the logic behind the adoption of such decrees - following a specific meeting on a particular issue. Again, the exception was the Strategy of Physical Culture and Sports Rehabilitation: it was preceded by another decree on the same topic, and the Strategy itself provided for the improvement of the system of physical culture and sports rehabilitation at different levels and in different aspects.

131 On the Advisory Council for War Veterans and Families of Fallen (Deceased) Defenders of Ukraine: Decree of the President of Ukraine of 2.06.2020 No. 209/2020.

132 On the Regulation on the Advisory Council on War Veterans and Families of Fallen (Deceased) Defenders of Ukraine: Decree of the President of Ukraine of 14.07.2020.

133 Issues of the Advisory Council on Ensuring the Rights and Freedoms of Defenders of Ukraine: Decree of the President of Ukraine of 9.04.2021 No. 152/2021.

134 For example: the indicator is "the number of veterans receiving rehabilitation during the year", the baseline is "1000 veterans per year", the target is "1500 veterans per year".

Thus, at the level of presidential decrees, the policymaking process had certain shortcomings: 1) the decrees were mostly isolated, 2) they did not contain most of the elements necessary for policy planning, and 3) they were mostly non-binding.

It is interesting that in the period 2014-2022, both presidents almost never submitted draft laws on veteran issues (they submitted only one draft law each). Of course, given their significant political role and political representation in the parliament, they influenced veteran policy and bear part of the responsibility for it. For example, most of the interviewed experts believe that the idea of creating the Ministry of Veterans and its overall political support was provided by Poroshenko's team.

3.3. Legislative Work in the Verkhovna Rada

The Ukrainian legislative process is somewhat different from the Western model: in particular, the instrument of legislative proposal is absent, and the use of policy development tools, such as white and green papers, is rather rare. This means that legislative drafts cover multiple stages of the policy cycle at once: they simultaneously identify problems, make it onto the agenda, and serve as policy development.

Another difference in the Ukrainian parliamentary tradition is that draft laws (and their accompanying documents, including explanatory notes) do not contain mandatory elements of policy planning documents, such as performance indicators, measurable targets, baseline and target levels, monitoring and evaluation measures, etc. Accordingly, this report will focus on the analysis of government planning documents, as they more accurately reflect the government's intentions in the veteran policy sphere.

We have analysed 195 registered draft laws on veteran policy between 27 November 2014 (the beginning of the eighth convocation) and 23 February 2022 (the last day before the full-scale invasion). This includes 143 draft laws in the eighth convocation and 52 drafts in the ninth.

In both the eighth and ninth convocations of the Verkhovna Rada, MPs almost always initiated draft laws on veteran policy, while the President initiated only one in the eighth convocation and one in the ninth. The Cabinet of Ministers initiated only 8 out of 143 veteran draft laws in the eighth convocation and 2 out of 52 in the ninth. Of course, both the President and the Cabinet of Ministers had significant influence on MPs, and some draft laws were developed in cooperation with all legislative initiators. In some cases (e.g., draft laws No. 3407 and No. 4389 of the ninth convocation), the authors (the authors, not the initiators) of the draft laws were directly listed as representatives of the Cabinet of Ministers, but in some cases the government could informally submit draft laws through MPs without stating this in the supporting documents.

In the eighth convocation, representatives of the parliamentary majority submitted slightly more draft laws than representatives of the parliamentary minority (69 drafts from the majority and 65 from the minority), and in the ninth convocation, representatives of the parliamentary minority submitted more draft laws (18 drafts from the majority and 31 from the minority).

The fact that MPs were the initiators and authors of the vast majority of draft laws defined several characteristics of these drafts.

Firstly, MPs' draft laws are usually less sophisticated, as MPs have less expertise and analytical capabilities, and there are no requirements for the quality of such draft laws, either in terms of providing expert opinions before registration or in terms of approval and discussion.

Secondly, such draft laws usually have a much worse financial and economic justification (usually it is simply absent), which already poses implementation problems for the draft law.

Thirdly, MPs' draft laws usually have worse chances of passing, as they have less political support in the session hall. The lower level of political support for MPs' draft laws, in turn, is due to the lower status of MPs (compared to the President or the Cabinet of Ministers), their lower publicity on average, and the lower coherence of their initiatives with the policy being implemented, etc.

Fourthly, for the above reasons, MPs tend to focus their attention on specific issues in their draft laws. Such point draft laws, if adopted in the context of an overall outdated policy framework, either have a minimal positive effect (because they solve minor problems and are not always synchronised with the overall framework) or unbalance the existing policy at all. All these points are interconnected, so the limited expert, analytical and political capacity of MPs to prepare high-quality draft laws is combined with an outdated policy framework and potentially problematic implementation. All these characteristics are evident in the veteran-related draft laws.

3.3.1. Problems and Objectives

Ukrainian draft laws and explanatory notes thereto have a rather low level of analysis of problems and alternatives for addressing them. Problems are usually derived from the objectives and instruments used in the draft laws. Other alternatives for solving the problems are not analysed at all. Therefore, it is quite difficult to analyse the possibility of solving the problem with the instruments proposed by the draft laws, comparing different alternatives. Accordingly, in this chapter, the problems and objectives are analysed together, considering the prospects of their respective topics.

In both the eighth and ninth convocations, just over half (55-58%) of the draft laws were aimed at addressing issues and, accordingly, achieving goals related to specific benefits or payments within the framework of the old policy. These were often draft laws proposing to extend established benefits for one category to another, or to increase the amount of already provided benefits, or to harmonise legislation in connection with some legislative changes to benefits. Here are some typical examples of such draft laws:

- ▶ No. 2215 of 24.02.2015, which provides persons with disabilities sustained during participation in the ATO with the right to priority sanatorium treatment¹³⁵;
- ▶ No. 7548 of 05.02.2018, which provides family members of fallen service members with the right to free travel¹³⁶;
- ▶ No. 3249 of 20.03.2020, which provides for the establishment of a minimum level of unemployment benefits for veterans at a level not lower than twice the actual subsistence level for able-bodied persons¹³⁷.

Another significant part of the draft laws - 15% in the eighth convocation and 17% in the ninth - is to add a new category with a full benefits package to the existing statuses (mainly the status of "combatant"). For example, various draft laws propose to extend a certain veteran status to medical workers

135 On Amendments to the Law of Ukraine "On the Status of War Veterans and Guarantees of Their Social Protection" (regarding priority free sanatorium and resort treatment for disabled war veterans who participated in the anti-terrorist operation): Draft Law of Ukraine of 24.02.2015 No. 2215.

136 On Amendments to Article 15 of the Law of Ukraine "On the Status of War Veterans and Guarantees of Their Social Protection" (regarding the provision of preferential travel to family members of the deceased): Draft Law of Ukraine of 05.02.2018 No. 7548.

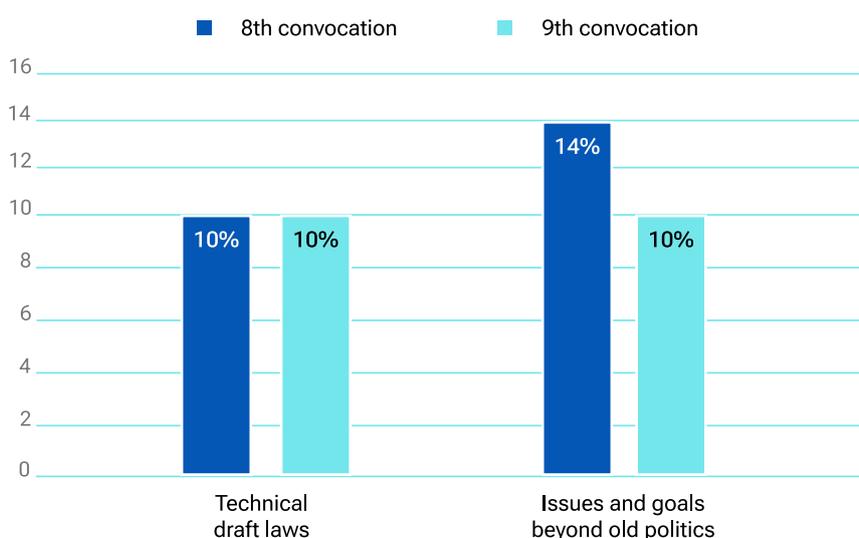
137 On Amendments to Article 23 of the Law of Ukraine "On Compulsory State Social Insurance for Unemployment" to increase the amount of unemployment benefits for participants of the anti-terrorist operation and other war veterans: Draft Law of Ukraine of 20.03.2020 No. 3249.

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operating in the JFO area¹³⁸, military priests (chaplains)¹³⁹, or to equalise “children of war” and “war veterans” in terms of the benefits provided by the law¹⁴⁰. With a few exceptions, the only change proposed by such draft laws was a simple extension of the existing outdated policy to new categories.

Some draft laws were more technical and concerned the mechanism for obtaining statuses. Such draft laws did not extend existing statuses to new categories or introduce new benefits, but rather defined new conditions (for example, the duration of stay in the ATO zone¹⁴¹) or the grounds (document¹⁴² or other evidence¹⁴³) to obtain the status. Such draft laws accounted for up to 10% of all veteran-related draft laws in both the eighth and ninth convocations.

The share of different types of bills in the 8th and 9th convocations



Problems and objectives that do not relate to the old veteran policy are present in 14% of the draft laws of the eighth convocation and about 10% of the draft laws of the ninth convocation. A closer look at these draft laws shows that, despite introducing rules that were not in the existing legislation, they partially follow the logic of the old veteran policy: benefits or social guarantees not related to rehabilitation, reintegration or military service. For example, this applies to tax discounts¹⁴⁴, rent

138 On Amendments to the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” regarding the granting of combatant status to medical workers: Draft Law of Ukraine of 29.10.2019 No. 2341.

139 On Amendments to Certain Legislative Acts of Ukraine Regarding Social Protection of Military Chaplains during the Anti-Terrorist Operation: Draft Law of Ukraine of 23.06.2017 No. 6643.

140 On Amendments to the Law of Ukraine Regarding the Status of War Veterans and Guarantees of Their Social Protection: Draft Law of Ukraine of 17.03.2021 No. 5255.

141 On Amendments to the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” regarding the status of persons who defended the independence, sovereignty and territorial integrity of Ukraine: Draft Law of Ukraine of 08.02.2016 No. 4039.

142 On Amendments to Article 6 of the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” (to strengthen the requirements for granting the status of combatant): Draft Law of Ukraine of 20.01.2015 No. 1802.

143 On Amendments to Article 6 of the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” (regarding social and property guarantees for members of volunteer battalions): Draft Law of Ukraine of 30.12.2014 No. 1684.

144 On Amendments to the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” (regarding privileges in the payment of taxes, fees and other payments to the budget when vehicles are imported into the customs territory of Ukraine by participants of the anti-terrorist operation and family members of the Heavenly Hundred): Draft Law of Ukraine of 16.09.2016 No. 5133.

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payments¹⁴⁵, the right of access to cultural property¹⁴⁶, and exemption from customs duties on imported cars¹⁴⁷.

The other category includes draft laws aimed at point improvements, often with imperfect implementation mechanisms or low technical and legal quality. In general, the draft laws in both the eighth and ninth convocations had similar topics and were often simply duplicated. These draft laws did not cover all areas of veteran policy, but rather dealt with the following issues:

1. Entrepreneurship and employment:
 - a. Non-refundable financial assistance for entrepreneurs who participated in the ATO to develop their business.
 - b. Obliging enterprises, institutions and organisations with more than 20 employees to set a quota of 5 per cent of their staff to employ combatants.
 - c. Establishing tax benefits for companies employing veterans or having veterans as founders.
2. Rehabilitation:
 - a. Provide family members of military personnel and CMB with the right to undergo free psychological, medical, psychological, and physical rehabilitation.
3. Miscellaneous:
 - a. Amnesty for minor crimes committed during the ATO and further psychological rehabilitation of the perpetrators.
 - b. Exemption from court fees for cases on the status of CMB and establishing the fact of death of a person who died or went missing during the ATO.
 - c. Priority provision of manual cars and exemption from customs duties for certain categories of people with war-related disabilities.

The only “veteran” draft law submitted by President P. Poroshenko concerned the establishment of the Day of the Defender of Ukraine¹⁴⁸. While the only draft law on veteran issues submitted by President V. Zelenskyy by 24 February 2022 provided for the granting of combatant status to persons involved in confidential cooperation who participated in the tasks of the resistance movement in the temporarily occupied territory of Ukraine¹⁴⁹ (although the draft law itself was aimed at another issue, and the extension of the status of CMB was one of the additional provisions). At the same time, unlike most parliamentary draft laws, both presidential draft laws were adopted.

145 On Amendments to the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” (regarding the establishment of a minimum land rent for ATO participants): Draft Law of Ukraine of 21.07.2016 No. 4041a.

146 On Amendments to Certain Laws of Ukraine on Granting the Right of Access to Cultural Property and Cultural Goods to Internally Displaced Persons and War Veterans: Draft Law of Ukraine of 23.11.2015 No. 3503.

147 On Amendments to the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” (regarding the importation of vehicles into the customs territory of Ukraine by participants of the anti-terrorist operation): Draft Law of Ukraine of 02.09.2016 No. 5057.

The interviewed stakeholders mentioned this initiative in their interviews: *“The law on preferential customs clearance of vehicles for veterans [...] They said that veterans need cars. Veterans want cars, but do they really need them? If someone spends \$2000 on a ‘tin can’, will it make them more successful? Perhaps it would be better to spend that \$2,000 on thermal modernisation of the building so that they could pay less for the utilities every month.”*

148 On Amendments to Article 73 of the Labour Code of Ukraine (regarding the establishment of a public holiday - Defender of Ukraine Day): Draft Law of Ukraine of 20.02.2015 No. 2187.

149 On the Foundations of National Resistance: Draft Law of Ukraine of 25.05.2021 No. 5557.

The government initiatives of the eighth convocation were primarily focused on specific issues. These draft laws dealt with the extension of statuses or existing benefits to new categories and improving the mechanism for granting existing benefits. All of these were point issues. The draft law No. 1577 of 22.12.2014 is worth mentioning separately, which stipulated that *benefits are granted if the average monthly total family income per person for the previous six months does not exceed the amount of income that gives the right to a tax social benefit*¹⁵⁰. This government draft law, registered at the end of December 2014, was adopted and became a law that played a key role in the further development of veteran policy. The reason for its adoption is quite simple - an attempt to save budgetary funds in crisis conditions.

In September 2015, a group of MPs, mostly members of the Opposition Bloc faction, submitted a petition to the Constitutional Court asking it to declare the law unconstitutional. In December 2018, the CCU declared the provisions of the law unconstitutional¹⁵¹. The essence of the decision was that *“the provision of benefits and other guarantees of social protection to war veterans and persons covered by Law No. 3551 should not depend on the financial situation of their families and should not be conditioned by the lack of financial capacity of the state”*. In its ruling, the CCU referred to a number of previous decisions from the late 1990s and mid-2000s, but it was the 2018 decision that actualised this position. Some of the draft laws^{152, 153, 154} and expert opinions on the draft laws were made in response to or taking into account the 2018 decision (other CCU decisions are usually not mentioned at all).

The main idea that the developers (or at least some of them) of the veteran policy came up with was that the existing benefits and social guarantees cannot be “touched” and are almost inviolable. It was at the end of 2018 that another important event for veteran policy took place - the Ministry of Veterans was established. That is, from the very moment the Ministry of Veterans was established, as a body that was supposed to be aimed at forming a new veteran policy, the issue of the inviolability of the old legislative framework for veteran policy was brought to the fore.

Already in the ninth convocation, new systemic initiatives were influenced by the 2018 CCU decision. For example, draft law No. 4389 (discussed in more detail below) created a parallel new policy without introducing any changes to the old legislation, and some initiatives never became draft laws because their authors did not see any prospects for their adoption (due to constitutional restrictions updated in 2018).

As of 24 February 2022, we have identified only two government initiatives on veteran policy in the ninth convocation. One is quite systemic and will be discussed in detail below, while the other is important, although it deals with a narrow issue: it defined and established the principles of *the State Policy of Social Protection of War Veterans and Members of Their Families, Family Members of Fallen (Deceased) War Veterans, Family Members of Fallen (Deceased) Defenders of Ukraine, and introduced*

150 On Amendments to and Invalidation of Certain Legislative Acts of Ukraine: Draft Law of Ukraine of 22.12.2014 No. 1577.

151 Decision of the Constitutional Court of Ukraine in the case of social protection of war veterans and members of their families of 18.12.2018 No. 12-p/2018.

152 On Amendments to the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” to bring its provisions in line with the decision of the Constitutional Court of Ukraine of 18 December 2018 No. 12-r/2018: Draft Law of Ukraine of 20.12.2018 No. 9428.

153 On Amendments to the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” to implement the decision of the Constitutional Court of Ukraine No. 12-r/2018 of 18 December 2018 on social protection of war veterans and persons with special services to the Motherland, as well as their family members: Draft Law of Ukraine of 21.12.2018 No. 9428-1.

154 On Amendments to the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” to restore benefits in connection with the decision of the Constitutional Court of Ukraine No. 12-r/2018 of 18 December 2018 and to clarify certain provisions: Draft Law of Ukraine of 04.01.2019 No. 9428-2.

a *Comprehensive Review of the System of Social Protection of War Veterans and Members of Their Families, Family Members of Fallen (Deceased) War Veterans, Family Members of Fallen (Deceased) Defenders of Ukraine*¹⁵⁵.

3.3.2. Financial and Economic Planning

Financial and economic planning is an important part of policy development, yet in the Ukrainian legislative tradition, cases of high-quality financial and economic justification are the exception rather than the rule. The situation with the financial and economic justification of veteran-related draft laws is no different from the general level. This is partly due to the predominance of draft laws initiated by MPs, for which there is no preliminary quality control of the financial justification, therefore it is usually simply absent.

We categorised the financial and economic justifications of the 195 analysed draft laws into three groups:

- ▶ The first group consists of draft laws with detailed financial calculations¹⁵⁶ (in the explanatory note or in annexes);
- ▶ The second group includes draft laws that do not have them, but do not require them (for example, these are draft laws on the list of documents required to obtain the CMB status¹⁵⁷);
- ▶ The third group includes draft laws that will require budgetary funding, but the accompanying documents either do not contain financial calculations at all or calculations provided are populist (they provide for additional payments of several billion, and the source of coverage is called, for example, an abstract “*reduction of the shadow economy*”).

For the eighth convocation, only 7% of draft laws have more or less detailed calculations. No calculations are required in 14% of the draft laws. Instead, the remaining 79% of draft laws lack adequate financial and economic justification. In the ninth convocation, the situation was even worse: 6% of draft laws had financial and economic calculations, 10% of draft laws did not require calculations, and 84% of draft laws either did not have financial and economic justification at all or were populist.

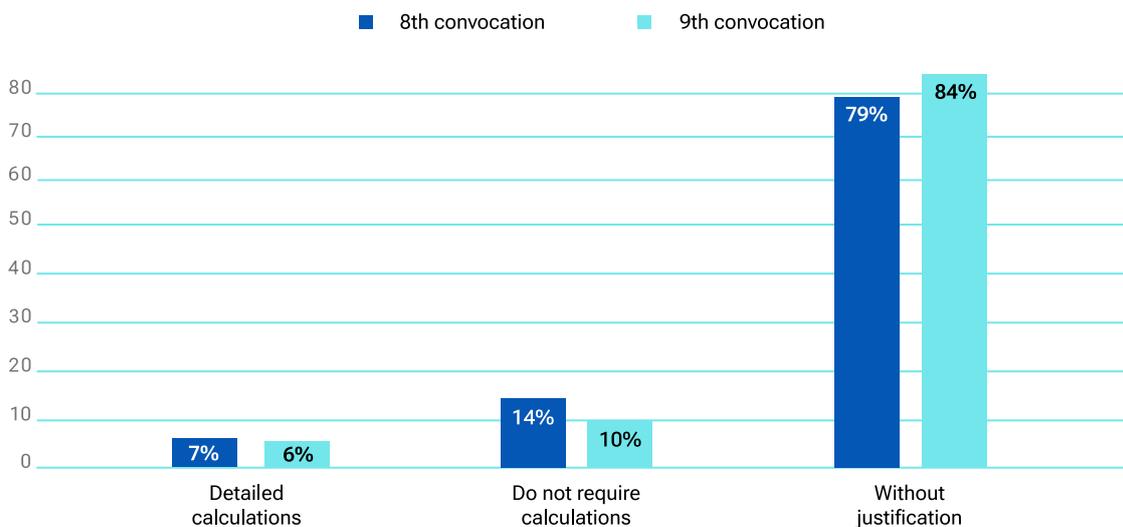
Of course, the problem of poor financial and economic justification is not unique to veteran draft laws, it is a general parliamentary shortcoming. However, the presence of such a flaw in veteran-related draft laws also indicates a poorer quality of planning, a lower potential for quality implementation, and lower chances of further passage.

155 On Amendments to the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” regarding the introduction of a comprehensive review of the system of social protection of war veterans: Law of Ukraine of 24.03.2022 No. 2147-IX.

156 We hardly evaluated their substantive quality, focusing more on the fact that they contain calculations. It is possible that some of these calculations are incorrect, but the participants of the lawmaking process have a certain benchmark for evaluation, comparison, and analysis.

157 Of course, it can be noted that the list of documents required to obtain the status may affect the number of people who will receive this status. Accordingly, this affects the budgetary expenditures. However, it would be naive to expect such complex (and perhaps initially unobvious) calculations and modelling, given that adequate financial justification is not provided even in draft laws with a direct increase in expenditures.

Financial and economic justification of draft laws



3.3.3. Quality of Drafted Laws

Evaluating the quality of draft laws is a rather complex task. Especially if we attempt to provide an independent and comprehensive assessment. However, we can try to give a rough estimate of the quality of all 195 veteran-related draft laws based on the assessment of the draft laws by the expert and analytical units of the Verkhovna Rada Secretariat. Using the opinions of the MSED (and in some cases the MLD and committees), we attempted to determine the overall quality¹⁵⁸ of veteran-related draft laws. We divided the opinions of the expert-analytical units into three groups:

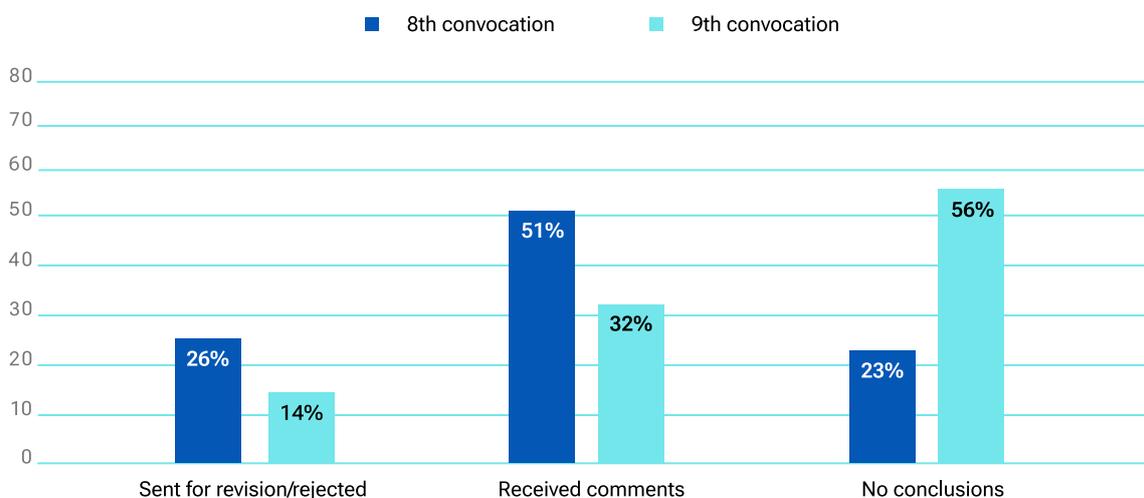
- ▶ The first group consists of opinions that recommend rejecting the draft law or sending it back for revision, which is a direct sign of the low quality of such a draft law or its irrelevance.
- ▶ The second group includes opinions where comments are made on the draft laws, but where there is either no overall opinion or the draft law is recommended for adoption after addressing the comments - this at least indicates the relevance of the problem addressed by a particular draft law, with certain technical remarks on a particular mechanism.
- ▶ The third group consists of draft laws that did not receive any opinions from the MSED and the main committee: in most cases, this indicates that the draft law that did not receive any opinions is of such poor quality and/or unnecessary that it is not planned to be processed at all (although sometimes the lack of opinions indicates a lack of political consensus rather than poor quality or unnecessary).

In the eighth convocation, 26% of veteran-related draft laws were recommended for revision or rejected altogether, 51% of draft laws received various comments, and 23% received no opinion at all.

In the ninth convocation, 14% of veteran-related draft laws were recommended for revision or rejection, 32% of draft laws received various comments, and 56% have not yet received opinions.

¹⁵⁸ Of course, the expert and analytical units may make mistakes in individual cases or assess only certain aspects of the quality of draft laws, primarily legal quality. Nevertheless, we assume that for most draft laws, the assessment of these units is a good indicator of the quality of the draft laws.

Analysis of veteran-related draft laws



3.3.4. Systemic Draft Laws

Systemic draft laws on veteran policy can be divided into two groups. One group is those related to the development of a new veteran policy, and in this chapter, we will consider all five of these draft laws in detail. Before doing so, however, it is worth mentioning the second group of systemic draft laws - those that propose comprehensive improvements to social protection under the old veteran policy.

3.3.4.1. Comprehensive Draft Laws Under the Old Policy

In total, we identified two comprehensive draft laws under the old policy in the eighth convocation and five in the ninth. This makes up 2% of the veteran draft laws of the eighth convocation and 10% of the veteran draft laws of the ninth convocation. Comprehensive draft laws of the old policy can be divided into two types.

Type I

Proposes to restore previously canceled benefits and social guarantees.

Type II

Defines the problem as insufficient social protection of veterans and, accordingly, the purpose of such draft laws is to “mechanically” increase social protection by increasing the amount of payments or preferential interest, sometimes in combination with expanding the circle of people who can receive benefits, etc.

While overall, both types focus on the old topic of social privileges.

The situation with the financial and economic justification of these draft laws in the eighth convocation differs: one draft law has detailed calculations, while the other has populist calculations (it provides an unreasonable estimate of the cost of implementation, and it is proposed to cover this cost by *“bringing a significant part of the economy out of the shadows”*). For the ninth convocation, the situation is homogeneous: all draft laws on comprehensive improvement of social protection under the old policy had populist calculations.

The MSED provided its opinion on only two draft laws, while the rest of the draft laws did not receive any MSED opinions, which indicates that they are not important and have low priority. The two draft laws that did receive an opinion from the MSED/main committee received negative opinions, with recommendations to return them for revision in one case and reject them in the other.

All draft laws on a comprehensive increase in benefits under the old policy are united by the type of their initiators - they are all submitted by MPs from the parliamentary minority. This characteristic explains the social and populist content of the draft laws and the corresponding financial justification. The role of the parliamentary minority in the dimension of political struggle is to criticise the government. Accusing the government of insufficient social protection of certain categories of the population is a traditional rhetoric of the opposition. Therefore, it is quite possible that the aforementioned draft laws were not developed with the aim of their adoption, and, accordingly, did not require well-thought-out policy instruments or high-quality financial calculations (even if adopted, the government would have to seek funds for these benefits in cooperation with the parliamentary majority).

Having considered the point changes and comprehensive changes within the old policy, we can now move on to those draft laws that were aimed at systemic changes, i.e. what can be called *the new veteran policy*.

3.3.4.2. Draft Law No. 2248

Draft law No. 2248 of 26.02.2015¹⁵⁹ was initiated by Semen Semenchenko, a member of the Samopomich faction (at the time of registration of the draft law, the faction was a member of the coalition). It was probably the first draft law to systematically regulate the issue of veterans' rehabilitation. It envisaged the adoption of a new law, rather than the typical spot *amendments to individual legislative acts*. This draft law tried to solve the problem of *"suicides, internal conflicts, and drunkenness. Even after returning home, the post-war social adaptation of service members is difficult and sometimes unsuccessful."* To solve this problem, the draft law proposed the creation of a system for providing rehabilitation services. This system would define the types and levels of rehabilitation, their content, and create a system of rehabilitation centres.

Even though the draft law aimed to address significant issues, its financial and economic justification was far from perfect: there were no calculations of the cost of its implementation, and this uncertain cost was planned to be covered by an initiative that was disconnected from the reality of the time (a special fee for postponing military service during mobilisation). It had a number of other substantive shortcomings and was ultimately withdrawn shortly after being submitted. Neither the main committee nor the expert units had time to issue their opinions.

3.3.4.3. Draft Law No. 2838

The draft law No. 2838 of 13.05.2015¹⁶⁰ was initiated by Vitalii Barvinenko, a member of the "Vidrodzhennia" group (which is not part of the coalition), together with four other MPs (one non-factional and three coalition members). This draft law also addressed the issue of rehabilitation and tried to solve the problem caused by *"the need to provide social support to combatants who participated in the anti-terrorist operation, their social and psychological rehabilitation both at the place of residence and in inpatient centres for social and psychological rehabilitation"*. This draft law was also

159 On the Rehabilitation of Combatants and Participants of Anti-Terrorist Operation: Draft Law of Ukraine of 26.02.2015 No. 2248.

160 On Amendments to Certain Legislative Acts of Ukraine on Social and Psychological Rehabilitation of Combatants Who Participated in the Anti-Terrorist Operation: Draft Law of Ukraine of 13.05.2015 No. 2838.

aimed at creating a rehabilitation system: it introduced the concept of a “*centre for social and psychological rehabilitation*” and defined the State Standard Programme for Social and Psychological Rehabilitation of Disabled Persons and Combatants who Participated in the Anti-Terrorist Operation. This draft law had at least some financial estimates that can be relied on when calculating the implementation of the draft law, although they can be criticised from the point of view of completeness and adequacy. In addition, the draft law received the MSED’s opinion, which provided several comments. The Committee on Veterans Affairs recommended rejecting the draft law based on the comments of the MSED and three ministries (Ministry of Finance, Ministry of Health, Ministry of Social Policy).

3.3.4.4. Draft Law No. 6350

Draft Law No. 6350 of 25.11.2021¹⁶¹ was initiated by the government of D. Shmyhal. The problem that the draft law was supposed to solve was identified by the initiators as follows: “*there is no single legislative act aimed at consolidating the efforts of all parties involved in social dialogue to regulate processes ensuring the social protection of war veterans and members of their families at both the state and local levels, including the provision of psychological rehabilitation services, educational services in the field of adult education, the development of entrepreneurial initiatives, etc. The above makes it impossible to fully establish proper conditions for the livelihood of war veterans and members of their families in line with contemporary demands.*”

Accordingly, this draft law included four main components: 1) the introduction of three levels (state, regional and local) of social protection programmes for veterans, 2) the right to psychological rehabilitation and adult education for veterans, 3) guarantees of state support for entrepreneurial initiatives and the provision of social services to war veterans at the expense of the state budget. Unusually for Ukrainian draft laws, this one contained quite detailed financial and economic calculations of state budget expenditures under the programme; the Ministry of Veterans was designated as the main budget holder. However, the budgetary expertise showed that the impact of the draft law on local budgets was not calculated, although the draft law required expenditures from local budgets as well¹⁶². The MSED provided some comments on the draft law, including the adequacy of the estimates of the number of veterans, the difficulties of correlating social protection programmes at different levels, and some technical and legal shortcomings. Nevertheless, the main committee recommended that the draft law be passed in the first reading. However, this happened only a few weeks before the start of the full-scale invasion, so draft law No. 6350 remained in limbo (probably due to the full-scale invasion that began three months after the draft law was registered) and by early 2024 had lost its relevance (due to changes in the environment, political team and the emergence of new legislative initiatives).

3.3.4.5. Draft Law No. 3407

Draft law No. 3407 of 29.04.2020¹⁶³ was formally initiated by almost the entire faction of “Holos” (which is not part of the coalition), although the draft law’s authorship team extends much further: former representatives of the Ministry of Veterans (including the Minister and the First Deputy Minister), representatives of the public, the Council of Veterans, the Public Council and the Council of Families of the Fallen under the Ministry of Veterans. The draft law did not clearly define the problem

161 On Amendments to Certain Laws of Ukraine Aimed at Providing Additional Guarantees of Social Protection for War Veterans: Draft Law of Ukraine of 25.11.2021 No. 6350.

162 Budgetary expertise to the draft law reg. No. 6350: Verkhovna Rada of Ukraine. Committee on Budget.

163 On the Status of Veterans and Family Members of Fallen (Deceased) Defenders of Ukraine and Veterans: Draft Law of Ukraine of 29.04.2020 No. 3407.

it was supposed to solve, but it could broadly be described as the general obsolescence of veteran policy. This draft law was one of the two most systematic draft laws registered for the period up to 24 February 2022. It regulates a wide range of issues, was developed in cooperation with various organisations, propose extensive reforms, and has received many expert opinions. Therefore, it requires a more detailed analysis.

The process of developing this draft law aimed to be as transparent as possible, involving all relevant stakeholders:

“Assembled groups of beneficiaries of this law for each section of the legislation. For instance, the section on ‘Guarantees for the Families of the Fallen’ was developed by families of the fallen. The section on guarantees for those injured during the Revolution of Dignity [...] was developed by those who suffered during the Revolution of Dignity. [...] It was submitted under the authorship of the Council of Veterans, the Public Council, the Veterans’ Movement, and the Council of Families of the Fallen. In other words, all the beneficiaries were directly involved”

Draft Law No. 3407 provides for the adoption of a new law and amendments to several other laws. The changes proposed by this draft law include the following provisions:

1. The termination of the Law “On the Status of War Veterans and Guarantees of Their Social Protection”.
2. Definition of the state policy regarding veterans and family members of fallen (deceased) defenders of Ukraine and veterans, as well as its principles.
3. Updating the status system. The main changes to the statuses:
 - a. Only individuals who participated in combat operations would be recognised as veterans.
 - b. A specific status for family members of veterans would be established.
4. Separation of legislative regulation in relation to combatants and war veterans. At the same time, a draft law “On the Status of Persons Who Contributed to the Defence of the Motherland and Persons Affected by Armed Conflicts” was submitted¹⁶⁴ to regulate the provision of benefits to war veterans and non-combatant categories affected by the conflict or who contributed to the defence of the Motherland.
5. Updating the package for state assistance to veterans. The main changes to the updated state aid package are as follows:
 - a. An additional package within the general programme of state guarantees for public health-care services, medical services and medicines.
 - b. The right to psychological support at the legislative level.
 - c. Programmes for housing loans and compensation for housing purchases.
 - d. Compensation for tuition costs at public and private higher education institutions for relevant levels of professional (vocational), technical, pre-higher or higher education.

¹⁶⁴ On the Status of Persons Who Contributed to the Defence of the Motherland and Persons Affected by Armed Conflicts: Draft Law of Ukraine of 29.04.2020 No. 3408.

- e. The right to professional orientation and partial payment for retraining or skills enhancement services.
 - f. Compensation for the provision of social services.
 - g. Informing about available guarantees.
6. The following old benefits were retained: sanatorium and resort treatment; extraordinary capital repairs of housing; benefits for housing and communal services; labour guarantees; the right to free travel; priority land allocation; and the right to free legal aid.
 7. Establishing the principles of transition from military to civilian life.
 8. Principles of functioning of the Unified State Register of Veterans and Family Members of Fallen (Deceased) Defenders of Ukraine and Veterans.
 9. Definition and principles of state support for public associations of veterans, family members of fallen (deceased) defenders of Ukraine and veterans.
 10. Definition and principles of supporting veteran businesses.
 11. Definition and principles of forming the image of a veteran and honouring the memory of fallen (deceased) defenders of Ukraine and veterans.

Another advantage of draft law No. 3407 is its financial and economic justification (a separate 24-page appendix), which describes in detail the expenditures required to implement the draft law. Such a justification is atypical for MPs' draft laws and owes its appearance to a large team of authors, which included representatives of the executive branch (the draft law was developed before the Minister and the First Deputy were dismissed from their posts). However, as stated in the conclusion of the budget expertise, no sources of covering additional expenses were identified¹⁶⁵. The justification itself has also been criticised for being unrealistic - the Ministry of Social Policy estimated the cost of implementing the draft law at UAH 180 billion, which is UAH 100 billion more than the amount given in the financial and economic justification (UAH 86.2 billion). The Ministry of Finance did not support the draft law in terms of expanding the list of benefits and guarantees¹⁶⁶. The lack of sources to cover the costs of this law was also pointed out by the Committee on Energy, the MSED, the Human Rights Commissioner, the Ministry of Veterans, etc.

The MSED also expressed several other comments to the draft law. In the opinion of the MSED experts, the draft law has issues with the exclusion of certain categories of individuals from its scope or the vagueness of such inclusion/definition. In the opinion of the MSED, some issues of veteran policy are limitedly reflected in the Law and require further elaboration, such as veteran business. An important shortcoming is the exclusion of some benefits available in the Law "On the Status of War Veterans and Guarantees of Their Social Protection", which in turn may lead to the recognition of this law as unconstitutional (the MSED refers to Article 22 of the Constitution, but the CCU has a more extensive interpretation of the restriction of benefits for veterans). There are also smaller flaws, such as the need to divide the proposed law into sections, terminological shortcomings, duplication of provisions, etc.

Draft law No. 3407 has received criticism from various institutions: Committee on Education, Ministry of Justice, Ministry of Social Policy, Ministry of Defence, the Human Rights Commissioner, Ministry of Veterans.

¹⁶⁵ Conclusion of the budgetary expertise to the draft law of 29.04.2020, reg. No. 3408.

¹⁶⁶ Expert opinion of the Ministry of Finance of Ukraine on the draft law "On the Status of Persons Who Contributed to the Defence of the Motherland and Persons Affected by Armed Conflicts" (register No. 3408 of 29.04.2020): Ministry of Finance of Ukraine.

The main substantive obstacles to this draft law were related¹⁶⁷ to three key issues: 1) non-compliance with the Constitution in terms of narrowing the rights of current veterans (actual deprivation of their status or cancellation of certain benefits), 2) shortcomings of the proposed system of statuses, in particular, changing the meaning of the concept of “veteran”, separation of war veterans, 3) financial issues - high cost of implementation and lack of clarity regarding the sources of funding.

Almost the only body to support the adoption of draft law No. 3407 was the Committee on Digital Transformation, which identified no significant shortcomings in relation to the Unified Electronic Register of Veterans¹⁶⁸.

The main committee on this draft law (the Committee on Social Policy), despite the shortcomings and comments from many institutions, recommended that the draft law No. 3407 be adopted as a basis. Consequently, the draft law was included in the agenda of the fourth session (from which it carried over to the agendas of subsequent sessions), but in fact, the draft law did not move further and was never included in the agendas of any meetings.

3.3.4.6. 3Draft law No. 4389

Draft law No. 4389 of 17.11.2020¹⁶⁹ is another important systemic legislative initiative in the field of veteran policy. Similar to draft law No. 3407, it was initiated by an MP (a coalition member and head of the subcommittee on veteran rights protection), although the authors' team included a broad group of contributors, including the then-serving Minister for Veterans Affairs, their deputies, representatives of the Public Council, and the Council of Families of the Fallen under the Ministry of Veterans. The draft lacked a clear definition of the problems it was supposed to solve. From the overall context of its purpose, the underlying problem can be identified as the general outdated approach to veteran policy. The draft law proposed the following changes:

1. Adoption of a new law titled “On Defenders of Ukraine and Members of Their Families”. At the same time, the law “On the Status of War Veterans and Guarantees of Their Social Protection” was neither intended to be replaced nor amended. This meant the coexistence of two parallel laws addressing a similar range of issues. Their coexistence was to be governed by the provision: *“If the right to the same benefit is provided for by different legal acts, the benefit is granted under one of them at the individual’s choice.”*
2. Establishing the principles of state policy regarding the defenders of Ukraine and the families of the fallen (deceased) defenders of Ukraine.
3. Introducing a new system of statuses, including: defender of Ukraine; defender of Ukraine with a disability; defender of Ukraine with special combat merit; family member of a fallen (deceased) defender of Ukraine. These statuses applied only to persons who directly participated in operations to defend the independence, sovereignty and territorial integrity of Ukraine (ATO/JFO). This system was to exist in parallel with the status system of the Law “On the Status of War Veterans and Guarantees of Their Social Protection”.
4. Defining a minimum period of time spent in the combat zone as a condition for obtaining the status of defender of Ukraine.

167 Here, we do not provide our own assessment but rather summarise the evaluation of this draft law as presented by its critics.

168 Opinion of the Committee on the Draft Law on the Status of Veterans and Family Members of Fallen (Deceased) Defenders of Ukraine and Veterans (Reg. No. 3407 of 29 April 2020): Committee on Digital Transformation.

169 On Defenders of Ukraine and Members of Their Families: Draft Law of Ukraine of 17.11.2020 No. 4389.

5. A package of social guarantees:

- An additional package to the general programme of state guarantees for healthcare, medical services and medicines.
- The right to psychological support at the legislative level.
- Housing loan and compensation programmes for the purchase of housing.
- Compensation for tuition fees at public and private higher education institutions at the appropriate level of professional (vocational), technical, pre-higher or higher education.
- The right to professional orientation and partial reimbursement for retraining or advanced training services.
- Compensation for the provision of social services.
- Information on available guarantees.

6. The status of defender also grants access to certain old benefits: sanatorium-resort treatment; priority major repairs of housing; benefits for housing and communal services; labour guarantees; the right to free travel; priority allocation of land plots; and the right to free legal aid.

7. Principles for transitioning from military service to civilian life.

8. Principles of state support for the employment of defenders and support for their competitiveness, support for their self-employment and entrepreneurial activity.

9. Principles of state policy on heroisation and commemoration.

10. Principles of creation and functioning of the Unified Register of Veterans and the Unified Register of Deceased Veterans.

11. Principles of interaction between the state and public associations of veterans.

12. The mechanism of deprivation of the right to status.

Draft law No. 4389 lacked any financial justification. There were no estimates of the cost of implementing the draft law, nor for reductions in other budget items or additional sources of revenue to cover expenses. Given that the draft law No. 4389 envisages the adoption of a new law and the introduction of a new system of state guarantees and statuses, the lack of financial and economic justification is a significant deficiency and a direct violation of Part 1 of Article 27 of the Budget Code of Ukraine and Part 3 of Article 91 of the Rules of Procedure of the Verkhovna Rada of Ukraine, as noted in the budgetary expertise conclusion¹⁷⁰.

Several institutions provided comments on the draft law. The Committee on Digital Transformation commented on the compensation mechanism for electronic communications operators¹⁷¹. The Ministry of Social Policy criticises the draft law for its inconsistency with the law “On the Status of War Veterans and Guarantees of Their Social Protection” in many aspects, the inconsistency of the draft law with the principles of compulsory pension insurance, the inconsistency of the draft law with the system of social services; it also criticises the duplication of provisions of existing legislation and the

170 Opinion of the Verkhovna Rada of Ukraine Committee on Social Policy and Protection of Veterans' Rights on the consideration of the draft law Reg. No. 4389: Verkhovna Rada of Ukraine. Committee on Budget.

171 Opinion on the Draft Law “On Defenders of Ukraine and Members of Their Families” (Reg. No. 4389 of 17 November 2020): Verkhovna Rada of Ukraine. Committee on Digital Transformation.

financial unreasonableness of the draft law¹⁷². The Ministry of Education criticised the draft law for its non-compliance with education legislation and its lack of financial justification¹⁷³. The Ministry of Finance did not support the draft law due to the complete absence of financial justification¹⁷⁴.

Interestingly, judging by the opinion of the Committee on Transport¹⁷⁵, the Ministry of Veterans proposed to revise the draft law, despite the fact that the Ministry's leadership was among the authors of this draft law.

The Committee on Social Policy, which is the lead committee on this draft law, did not provide a clear opinion on the content of the draft law, recommending only that it be included on the agenda¹⁷⁶. The MSED also did not provide an opinion on the draft law. Ultimately, draft law No. 4389 was included in the agenda of the session, however it did not progress further, nor was it reviewed by expert units (including the MSED, which usually provides opinions on all draft laws that are planned to be further processed), nor in the session hall (it was not included in the meeting agendas).

Thus, the key issues with draft law No. 4389 were its financial unreasonableness and many inconsistencies with the law caused by the attempt to create a parallel system of statuses.

A comparison of draft laws 3407 and 4389 reveals some interesting nuances in the development of veteran policy. These are the two most systematic draft laws that were registered by 24 February 2022. Both draft laws are the result of parliamentary-governmental cooperation with the involvement of the public: key officials of the Ministry of Veterans and representatives of the public, including those organisations that are members of advisory bodies to the Ministry of Veterans, were involved in the development of these draft laws, but the formal registration of the draft law (and participation in its development) was carried out by MPs. The reason for this form of registration may be the long and complicated procedures for drafting and approving draft laws by the Cabinet of Ministers (as defined in the CMU Regulations), while MPs are not required to conduct numerous expert reviews and signoffs of draft laws in other ministries. This fact partly explains why both draft laws received a large number of comments from ministries. In terms of privileges and social guarantees, the draft laws largely overlap: they propose similar packages of new state support and preserve similar content of existing state support.

The key difference between the draft laws lies in how they establish a new status system in relation to the law "On the Status of War Veterans and Guarantees of Their Social Protection". Draft law No. 3407 repeals the old law, replacing the existing system with a new one. Draft law No. 4389 does not affect the old law at all (neither repealing it nor amending it), but instead creates a parallel system of statuses for individuals who participated in the ATO/JFO. The primary mechanism for interaction between the draft law No. 4389 and the existing law is based on the concept of choosing a status: *"If the right to the same benefit is provided for by different legal acts, the benefit is granted under one of them at the individual's choice."*

172 Proposals of the Ministry of Social Policy of Ukraine to the Draft Law of Ukraine "On Defenders of Ukraine and Members of Their Families" (Reg. No. 4389 of 17.11.2020): Ministry of Social Policy of Ukraine.

173 On Consideration of the Draft Law of 17.11.2020, reg. No. 4389: Ministry of Education and Science of Ukraine.

174 Expert Opinion of the Ministry of Finance of Ukraine on the Draft Law "On Defenders of Ukraine and Members of Their Families" (Reg. No. 4389 of 17.11.2020): Ministry of Finance of Ukraine.

175 Opinion of the Committee on Social Policy and Protection of Veterans' Rights on the Draft Law "On Defenders of Ukraine and Members of Their Families" (Reg. No. 4389 of 17 November 2021): Verkhovna Rada of Ukraine. Committee on Transport and Infrastructure.

176 Opinion of the Verkhovna Rada of Ukraine Committee on Social Policy and Protection of Veterans' Rights on the Draft Law "On Defenders of Ukraine and Members of Their Families" (Reg. No. 4389 of 17 November 2021): Verkhovna Rada of Ukraine. Committee on Social Policy and Protection of Veterans' Rights.

Both methods, in the opinion of lawmakers (the MSED, committees, ministries), have advantages and disadvantages. Cancellation of the old law allows for a more coherent legislative framework (better internal consistency), but the downside of this approach is the risk of appeal to the CCU. Although the draft law No. 3407 declared the preservation of existing benefits, participants in the legislative process criticised it on the grounds that it limited some benefits and excluded certain categories from the scope of the draft law, which would lead to the deprivation of their existing benefits. Perhaps these comments led to the fact that the draft law No. 4389 took a different approach - without touching the old law at all. This approach has the advantage of limiting potential appeals to the CCU. However, there are a number of issues with the harmonisation of the draft law with other legislation and the problem of duplication of benefits. These problems may have led to the fact that neither the MSED, nor the Ministry of Justice, nor the Committee on Social Policy provided meaningful opinions on the draft law.

Another important distinction lies in the scope of individuals eligible for the new statuses. Draft Law No. 3407 grants veteran status only to those who participated in combat operations but does not limit this status to specific combat operations (or the territory where they took place). In other words, both ATO/JFO participants and those who fought in the war in Afghanistan can qualify as veterans and be eligible for the new package of state assistance. For the purposes of draft law No. 4389, only those who participated in the ATO/JFO are considered to be defenders of Ukraine. All other categories remain within the framework of the old legislative regulation (the Law on the Status of War Veterans and Guarantees of Their Social Protection). Moreover, a minimum duration of presence in the ATO/JFO area is established as a prerequisite for obtaining the status of defender of Ukraine.

A common feature of draft laws No. 3407 and No. 4389 was their issues with financial and economic justification. Draft law No. 4389 lacked such justification entirely. Draft law No. 3407 had a financial and economic justification for the required expenditure for its implementation, but there were no calculations on the sources of covering such expenditures (cuts in other budget items or additional revenues). Moreover, the Ministry of Social Policy estimated the cost of implementing the draft law at approximately UAH 180 billion, which was UAH 100 billion higher than the estimate of the authors of the draft law (UAH 86 billion). Given that both draft laws propose similar packages of state assistance (a list of new and existing benefits and guarantees), the implementation cost of both is likely comparable, ranging from 88 to 180 billion UAH. Therefore, a potential issue with both draft laws, which is why they have not moved forward, may be the substantial funds required for their implementation. The figure of UAH 180 billion represents 12.5% of the 2021 budget expenditures; by comparison, 11% of expenditures were allocated to healthcare. It can be assumed that no consensus was reached on allocating such significant funds to veteran policy in 2020 and 2021.

The analysis of draft laws No. 3407 and No. 4389 shows alternative approaches to defining the key components of veteran policy: the concept of a "veteran", as well as the scope and set of instruments of state support for veterans and other social groups. However, there is no alternative to addressing the lack of sufficient resources to ensure the implementation of both the first and second options.

3.4. Problems of Planning and Policy Development

The stage of planning and development of the veteran policy faced several issues that created obstacles on the way of the new veteran policy: 1) non-strategic nature of policy planning documents, 2) absence or low quality of policy planning tools, 3) low quality of financial and economic calculations, 4) precision of planned policy changes, 5) constitutional limitations, 6) low technical and legal quality, etc.

All three centres of policymaking were involved in the planning of veteran policy in one form or another: the Cabinet of Ministers, the Verkhovna Rada and the President. The President was the least involved in policymaking: both P. Poroshenko and V. Zelenskyy issued a few decrees related to veteran policy (their quality as policy planning documents is low) and almost never registered draft laws. The government directly and indirectly authored several important draft laws and included veteran policy issues in government-wide planning, as well as creating several strategic documents on veteran policy. The Verkhovna Rada and MPs were directly involved in drafting laws, although the number of systemic draft laws on the new veteran policy does not exceed five (three of them relate to specific areas and two are aimed at the entire policy).

Neither the Verkhovna Rada, nor the Cabinet of Ministers, nor the President has created a general strategy for the development of a new veteran policy.

Between 2014 and 24 February 2022, much of the development of veteran policy was concentrated within the framework of the **problems, goals and topics** of the existing policy. Only closer to the beginning of the full-scale invasion did the issues of the new veteran policy start to dominate the old issues and policy instruments.

The topical focus of the **President's** decrees¹⁷⁷ was quite broad, but sporadic - decrees were issued on various topics, probably following the results of meetings, and dealt with specific issues in different areas that were almost never continued in other documents. Perhaps the only exception to this trend was the topic of physical education and sports rehabilitation, which even received its own strategy. In terms of detail and specificity, the President's decrees were more like general political declarations than specific plans for policy change, mostly directed at the government, instructing it to take certain actions (partly those already in the government's plans). The question also arises as to whether presidential decrees are binding on the government. It is also questionable to what extent the approval of the Strategy for Physical Culture and Sports Rehabilitation falls within the competence of the President of Ukraine, since such documents should be approved (and have been approved in other areas) by the Cabinet of Ministers. The Ministry of Veterans is part of the Cabinet of Ministers, and it is this ministry that has the mandate to develop and submit strategies, programmes, concepts and other veteran policy planning documents to the government for approval. The same applies to the creation of presidential structures (the Commissioner and the Advisory Council), which enable the institutionalisation of presidential influence on the executive branch in veteran affairs. The mandate of the executive branch (the Ministry of Veterans) to formulate policy in the field of veteran affairs is diluted by the creation of parallel presidential structures with general powers.

In the general policy planning documents of **the Cabinet of Ministers**, such as the Government's Programmes of Activities and Priority Action Plans for a given year, veteran issues were almost always present, although they were not given much attention. Veteran policy was less well represented by sector: only one Strategy was adopted. While even this Strategy contained numerous planning shortcomings. One systemic draft law submitted (formally¹⁷⁸) by the Cabinet of Ministers can also be singled out.

The development of veteran-related draft laws¹⁷⁹ was carried out almost exclusively by members of **the Verkhovna Rada**, the themes of these draft laws typically addressed specific issues with the existing policy, less often specific issues of the new policy, and only five identified draft laws contained

177 The two veterans' draft laws initiated by the President are pointed and relate to the main areas of veteran policy somewhat indirectly.

178 Some other draft laws were formally submitted by MPs.

179 Draft laws may be considered policy instruments rather than policy documents, however, given the dominance of MPs lawmaking in Ukraine, draft laws and explanatory notes to them can be considered policy documents: they can identify problems, alternatives, contain a specific implementation plan, sources of funding, etc.

systemic proposals for a new veteran policy. Thus, when examining veteran policy planning documents as a whole, it can be concluded that **most problems were identified** during policy development, while the objectives/tasks of these documents, respectively, were aimed at addressing the identified issues, and the policy documents had different thematic focus.

The identification of problems in policy planning documents is no guarantee that these problems will be addressed. The policy documents were of different types. Some were descriptive and set out the issues that should be addressed and the tools that could be used to do so. This was the case, for example, with the Concept of the State Target Social Programme for Ensuring the Right to Housing: it outlined problematic areas and suggested approaches to address them, but it was not a true programme document that requires clearly defined actors to implement a list of interrelated measures aimed at systematically addressing the problem, using a calculated volume of resources to achieve measurable results. Each year, the government approved general planning documents (Priority Action Plans), but these provided general guidelines rather than specific directives. These general guidelines were expected to be detailed in sector-specific strategies. There were only two such documents: the government's *State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of ATO Participants*¹⁸⁰ and the presidential *National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans*¹⁸¹ and the Government's Action Plan for its implementation¹⁸². In addition, there were presidential decrees, registered draft laws and some other documents. However, there were only two strategies: 1) on general rehabilitation and readaptation, and 2) on sports rehabilitation. This poses a problem, as all other documents are aimed only at correcting specific issues, and this is not enough to revise the existing and formulate a new veteran policy.

Government policy planning is rather indirectly related to budget planning. The government plans its work using different tools: government-wide planning consists of Government Programmes of Activities and annual Priority Action Plans. Until April 2021, the CMU Regulations did not mention Priority Action Plans at all and did not have requirements for the content (mandatory elements) of the Programme of Activities¹⁸³. In other words, during the period of our study, all these documents had a rather arbitrary and declarative format. Any mandatory elements of policy development could be used or not used by a particular government depending on the "goodwill" of that government. **Even after the changes were introduced, both the Programme of Activities and the annual Priority Action Plans were not linked to the budget (neither to the budget planning process nor to budget implementation).**

In addition, there are also Activity Plans of the Ministry of Veterans¹⁸⁴, consisting of a set of measures the ministry intends to implement over the year. These plans do not include indicators or expected

180 On Approval of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of the Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022: Resolution of the Cabinet of Ministers of Ukraine of 5.12.2018 No. 1021.

181 Issues of Development of the National System for Physical and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans: Decree of the President of Ukraine of 23.08.2020 No. 342/2020.

182 On Approval of the Action Plan for 2021–2025 on the Implementation of the National Strategy for Developing a Physical and Sports Rehabilitation System for War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans: Resolution of the Cabinet of Ministers of Ukraine of 30.06.2021 No. 667.

183 On Amendments to the Resolutions of the Cabinet of Ministers of Ukraine of 31 January 2007 No. 106 and 18 July 2007 No. 950: Resolution of the Cabinet of Ministers of Ukraine of 21.04.2021 No. 377.

184 Ministry of Veterans Affairs Activity Plans // Ministry of Veterans Affairs. 2020.

results, but instead they answer the question of who (executors), what (content of measures) and when (timeframes) the ministry will act.

Government planning in the areas of veteran policy during the studied period included two strategic documents: the State Target Programme on Rehabilitation and the Strategy on Physical Culture and Sports Rehabilitation. While the State Target Programme was directly tied to budget programme No. 1501040, neither the Strategy for Physical Culture and Sports Rehabilitation nor the Action Plan for its implementation were linked to any budget programmes.

Instead, budget planning is carried out through budget programmes, which determine the specific purposes for which budget funds will be spent. These **budget programmes are very indirectly linked to the Government Programme of Activities, annual Priority Action Plans, and some parts of government planning** by direction (such as the Strategy and Action Plan for Physical Culture and Sports Rehabilitation, which are not linked to budget programmes). Instead, although the budget programmes declared their focus on achieving the goals of the general government policy, in practice, **they consisted of procedural measures that could not ensure the achievement of the policy goals and the objectives of the programmes and had a minimal impact on them.**

The correlation between government-wide planning, sectoral planning and budget planning for veteran policy illustrates how **the absence of a clear, understandable policy goal and a unified policy framework leads to aimless and inefficient spending of public funds** on various point measures, the set of which varies depending on the current understanding of the goal by a particular government agency.

A common issue in policy development has been the **absence or low quality of policy planning tools**. This applies to both strategies and other, less systematic policy planning documents. These documents often lack policy planning (and general project management) tools such as specific measures, deadlines, designated implementers, resource analysis of implementation, performance indicators (including baseline and target levels), monitoring measures, etc. Where they exist, these tools are often of poor quality. For example, there is a certain indicator to measure the achievement of the objective, but no specific target level is set to indicate that the objective has been achieved; or the measures are intended to “facilitate” or “support” something, or the deadlines for implementation are extended over the entire duration of the strategy. The absence or poor quality of policy planning tools means that **even well-intentioned ideas from policy developers aimed at solving pressing issues fail to deliver because implementers lack a clear framework for executing the proposed solutions**. Solution development should involve key stakeholders at the conceptualisation stage, who can provide early feedback on their own organisational, financial or legal constraints that will not distort the implementation process. Therefore, it is imperative that solution design teams include a representative of each stakeholder. Otherwise, there will be a lack of competencies, and the implementation mechanism will be developed based on false assumptions or stereotypes.

The shortcomings of policy development were partly due to shortcomings in the organisation of the respective process. Many attempts to develop policies were not brought to the stage of writing a final document:

“...there were 4 or 5 different groups that gathered on the topic of the law on mental rehabilitation for the military. Those were nice meetings; we had a great time. And then we met again, talked about the same thing, had a great time again, and after three months [...] the efficiency of this is almost zero. Then people start fighting among themselves. Because they think they are the most professional and correct. There is my opinion and there is a wrong opinion. It's all slip-

ping into destructiveness. In fact, time is wasted. Resources are also wasted, and in the end, we get - at best - low-quality material”¹⁸⁵

At the same time, policymakers also faced an objective problem: the lack of an evidence base on the effectiveness of a particular veteran policy instrument.

The problem with financial and economic calculations is not specific to veteran policy but is a general problem in policymaking. Both governmental documents and most draft laws **lack or have inadequate financial and economic calculations**. This, in turn, complicates the search for sources of funding for these initiatives, hinders their promotion and complicates their implementation. The problems with draft laws with financial and economic justification are primarily due to the fact that they are almost exclusively initiated by MPs who lack the expertise to prepare a high-quality financial justification, and they are not required to do so. At the same time, the submission of draft laws developed by the government through MPs indicates the low capacity of the Ministry of Veterans in terms of policy development: if the ministry that developed the draft law does not provide a financial and economic justification, the Ministry of Finance usually does not approve (in fact, blocks) such a draft law at the stage of government approval. Failure to provide a financial and economic justification, in turn, is due to the inability of the Ministry of Veterans to prepare it independently.

The quality of the content of policy planning documents is sometimes problematic. For example, the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Rehabilitation of ATO Participants, despite containing many policy planning tools, simply ignored the existence of the Ministry of Veterans Affairs during its first year of operation. Quality issues also apply to draft laws: some of them had quite progressive provisions, but their technical and legal quality prevented their further advancement.

One of the most significant problems in policy development became apparent in 2018 after the Constitutional Court's decision, namely: *“the provision of benefits and other guarantees of social protection to war veterans [...] should not be conditioned by the lack of financial capacity of the state”*. The main takeaway for the developers of veteran policy was that **existing benefits and social guarantees cannot be “touched” and are almost inviolable**. Thus, some initiatives to reform veteran policy were halted at the stage of ideas; their authors did not proceed to the stage of policy development, realising that it was impossible to implement them. Moreover, the CCU's ruling coincided with the creation of the Ministry of Veterans, the body responsible for shaping the new veteran policy, which had to take into account the aforementioned constitutional restrictions. On the other hand, the CCU's decision also influenced those draft laws that were registered, particularly the two most systemic draft laws registered by 24 February 2022: No. 3407 and No. 4389. Draft law No. 3407 declared the preservation of existing benefits, but participants in the legislative process still criticised it on the grounds that it limited some benefits and excluded certain categories from the scope of the draft law. Perhaps it was these comments that led to the adoption of draft law No. 4389 in a different way – by not touching the old law at all. The advantage of this approach is in limiting potential appeals to the CCU, but it raises a number of issues with the harmonisation of the draft law with other legislation and the problem of duplication of benefits.

The need to preserve existing benefits leads to another problem in the development of veteran policy - its high cost. New veteran policy instruments will require additional funds, but they cannot be trans-

¹⁸⁵ We can assume that the reasons for this state of affairs may be: 1) unsuccessful team design, in particular the concentration of “idealists” in the team who “create” the vision but are not directly involved in the implementation process and do not know the relevant actual limitations; 2) the absence of a person in the team who would qualitatively finalise the team's work into a draft legal act.

ferred from old ineffective benefits. That is, there is a **need to finance both old and new policy instruments, which increases its cost**. According to stakeholder estimates, the cost of implementing new systemic laws ranges from UAH 88-180 billion. Such a large range can be explained by objective difficulties in calculating it, as there was no market for service providers and no evidence base for most areas of veteran policy. In any case, this is a significant amount of money. The developers of veteran policy did not provide answers to where the necessary funds would come from.

The establishment of the Ministry of Veterans was an important point in the process of developing a veteran policy. This event also coincided with a general increase in attention to veteran issues. The volume of veteran issues in general government planning documents increased, and strategic documents were adopted in the areas of veteran issues (both the Target Programme on Rehabilitation/Re-adaptation and the Strategy for Physical Culture and Sports Rehabilitation were adopted after the creation of the Ministry of Veterans, although the target programme was probably developed before its creation). The Ministry of Veterans also played an important role in the development of systemic draft laws¹⁸⁶. The two largest draft laws, No. 3407 and No. 4389, were developed with the participation of officials from the Ministry of Veterans, as well as civil society, involved in cooperation with the Ministry.

¹⁸⁶ When we talk about the role of the Ministry of Veterans here, we are not assessing the quality of draft laws and strategic government documents, but rather highlight the emergence of such documents.

4. Policy Adoption

The next stage of the policy cycle is policy adoption. During the previous stage of the policy cycle (policy development), various, including alternative, solutions to identified problems were developed (i.e. policy alternatives were created)¹⁸⁷. While at the stage of policy adoption, the process of reviewing, discussing, seeking support, political struggle and political negotiations begins, which should ultimately lead to the adoption or rejection of alternatives. In other words, this chapter seeks to answer the question: why were some decisions were adopted while others were not?

In this chapter, we will primarily analyse the process of policy adoption in the legislative dimension. We will not analyse in detail the process of issuing presidential decrees due to the relatively closed and sometimes insufficiently documented nature of this process. A similar situation applies to Cabinet of Ministers' documents. Given the relative low priority of veteran issues, it is difficult to reconstruct the decision-making processes in these bodies, however we will attempt to do so for some of the most significant and illustrative episodes. We will not aim to analyse all documents, focusing only on the most important ones.

The process of reviewing and adopting decisions on veteran-related draft laws demonstrated significant differences and varying dynamics in the eighth and ninth convocations. These differences were primarily influenced by the situation with the parliamentary majority. In the eighth convocation, the coalition consisted of several factions that gradually withdrew. To pass draft laws, it was necessary to collect votes and negotiate between different political actors. In the ninth convocation, the situation changed significantly: the parliamentary majority was formed by a single faction, which required fewer additional votes to secure decisions. The structure of committees also has changed. In the eighth convocation (as in all previous convocations), there was a dedicated *Committee on Veterans and Persons with Disabilities* (in previous convocations, pensioners were often added to it), which focused its activities on veterans. In the ninth convocation, *the Committee on Social Policy and Protection of Veterans' Rights* was established, combining the mandates of the *Committee on Social Policy, Employment and Pensions* and the traditional "veteran" committee. Therefore, the focus of the Committee's attention in the ninth convocation was mixed with the voluminous and traditionally important topic of social policy. A nearly mirrored situation occurred in the governmental dimension. For almost the entire eighth convocation, the government's veteran policy portfolio was managed by a CEB under the Ministry of Social Policy, and the Ministry of Veterans operated only for the last six months of the eighth convocation, while in the ninth convocation, the government already had a separate ministry that was entirely focused on veteran affairs.

4.1. Eighth Convocation

In the eighth convocation, the presence of many factions and a specialised committee provided a greater number of entry points for veteran-related draft laws (compared to the ninth convocation), although they did not guarantee their adoption. Only 33 (23%) out of 143 veteran-related draft laws reached the stage of consideration and voting in the session hall.

¹⁸⁷ Alternative solutions to the problem can be developed by many different stakeholders and take different forms, ranging from informal conceptual documents to legally registered draft regulations. The previous chapter highlighted some of these options.

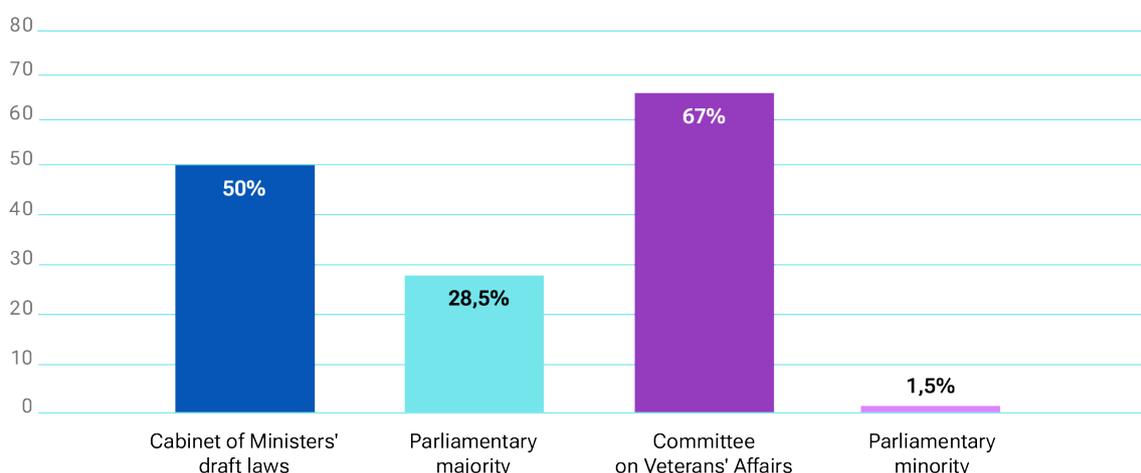
4.1.1. What Helped Pass the Draft Laws in the Eighth Convocation?

In total, we identified 26 adopted veteran-related draft laws out of 33 considered and 143 registered during the eighth convocation. On average, 244 MPs voted in favour of these drafts (there was almost no difference in support for the draft laws in between readings or initiators, averaging only a few votes). Half of the draft laws were adopted in the first reading, and the other half in the second reading.

Most of the adopted draft laws were initiated by the authorities: The Cabinet of Ministers (4 adopted), the President (1 adopted), representatives of the parliamentary majority (20 adopted), and only one adopted was initiated by a representative of the parliamentary minority. However, even this single draft law can be considered more of a committee draft rather than an “opposition” one, as it was initiated by a member of the Committee on Veterans and signed by all its members. Accordingly, an important factor that determined the adoption or non-adoption of draft laws was their political support by the authorities, which is logical.

The second important factor that determined whether a particular draft law would be adopted was **which government official initiated it**. The sole veteran-related draft law initiated by the President was adopted¹⁸⁸. Among the veteran-related draft laws proposed by the Cabinet of Ministers, half have been adopted. While among the registered veteran-related draft laws by representatives of the parliamentary majority, 28.5% were adopted. There is also a special group of MPs whose draft laws were adopted even more often than the government’s: 15 draft laws were identified as being initiated by members of the Committee on Veterans, of which 10 were adopted, i.e. **67% of the draft laws proposed by the Committee members were adopted**. However, out of 64 draft laws registered by representatives of the parliamentary minority, only one was adopted, or 1.5%. Thus, among the veteran-related draft laws, **presidential, committee and governmental draft laws had a better chance of being adopted**, while draft laws by other representatives of the parliamentary majority had a slightly lower chance of being adopted.

Share of approved veteran-related draft laws



The third factor that determines the adoption of a draft law is **the ability to engage allies in promoting the draft law** to gain support and minimise the efforts of opponents of the adoption of veteran-related draft laws. The high rates of adoption of presidential, committee and governmental draft laws demonstrate the relevance of this factor, as these actors have better capacity to attract support for the draft

¹⁸⁸ On Amendments to Article 73 of the Labour Code of Ukraine (regarding the establishment of a public holiday - Defender of Ukraine Day): Draft Law of Ukraine of 20.02.2015 No. 2187.

laws and more start-up support. Another aspect that confirms the importance of allies for the adoption of veteran-related draft laws is the number of signatories to the adopted draft laws - an average of 5 signatories, which is almost one and a half times more than for those that were not submitted for consideration.

The quality of draft laws, as the data shows, **played an important role in the adoption** or rejection of draft laws. Thus, among the adopted draft laws, there were only 2 (7.6%) that were recommended by the expert and analytical units to be sent for revision. The rest were subject to various comments, but in general, no one objected to their adoption, which indicates that they were of relatively good quality.

Thematic focus was also an important factor in the adoption of the draft laws. The overwhelming majority (58%) of the adopted draft laws share what can be called **a consensus of equalising justice**: stakeholders (primarily decision-makers) do not object to the fact that the benefits of one category are extended to another category, as it is injustice to have benefits for one category of people and not for another. Equalisation of justice can be achieved by increasing the number of people who can receive certain statuses or by granting benefits provided for one status group to individuals with another status. 12% of the adopted draft laws relate to facilitating the administration of veteran policy. Another third of the draft laws dealt with various issues: granting the right to free psychological rehabilitation after combat operations, establishing a new holiday (Defender of Ukraine Day), establishing and then cancelling benefits depending on the average monthly income, some secondary legislative changes, and the mechanism for calculating benefits. Among the adopted initiatives, the only one that is fundamentally new is the right to free psychological rehabilitation. Of course, this is partly due to the limited number of draft laws of this type, but the list of these draft laws is not limited to the only one adopted on psychological rehabilitation. Among other factors, the factor of thematic focus is specific to veteran issues, as the dominance of government draft laws, the involvement of allies and the quality of draft laws are more general factors that determine the adoption of not only veteran-related draft laws, but also draft laws in other areas.

4.1.2. Why Were Draft Laws NOT Adopted in the Eighth Convocation?

Six out of 33 draft laws under consideration failed to secure enough votes even for adoption as a basis. On average, 155 MPs voted in favour of them. These draft laws had a relatively good average number of signatories - 7.3; this may have contributed to their being brought to the plenary for voting. The draft laws that did not receive enough votes were united by the fact that they envisaged a significant increase in state budget expenditures, either directly or indirectly. For example, these draft laws had the following topics:

- ▶ *Providing veterans with the priority right to receive land plots, introducing the possibility of monetary compensation, and improving the mechanism for obtaining land plots.* Some stakeholders positively addressed the ideas contained in the draft law, but a clear mechanism for obtaining land or monetary compensation would mean an increase in the amount of money needed to finance these provisions and an increase in the number of land plots. Moreover, the draft law faced opposition from the Committee on Veterans, as it was processed through the Committee on Agricultural Policy¹⁸⁹.
- ▶ *Several draft laws have been submitted to improve the mechanisms for obtaining CMB status for volunteers, including by automating some of the processes, introducing a judicial mechanism for obtaining the status, and establishing responsibility for delays in the review of documents by officials.* Veterans often complain about the difficulties in obtaining CMB status. These draft laws deprived the authorities of the possibility of using administrative methods to restrict the granting of CMB status. In other words, if the draft laws were adopted, the authorities would be deprived of

189 Transcript of the plenary session No. 34 of 19.04.2018 // Verkhovna Rada of Ukraine. 2018.

an indirect way to limit the number of potential beneficiaries and, as a result, to limit the amount of budget expenditures.

- ▶ *Provision of compensation for medicines purchased independently by veterans.* This is a fairly logical step from the perspective of adapting Soviet benefits, which were created in a planned economy, to modern market requirements. Poorly performing Soviet benefits with low capacity require much less spending compared to widely available benefits adapted to modern conditions. In other words, these are the same administrative methods of limiting budget expenditures.

The draft laws that failed to secure enough votes were initiated by¹⁹⁰: representatives of the parliamentary minority - 4 draft laws, a representative of the parliamentary majority - 1 draft law, the government - 1 draft law.

Thus, the draft laws that failed in the parliamentary hall were initiated mainly by representatives of the parliamentary minority and provided for significant direct or indirect increases in budget expenditures. It is also worth remembering that some of the draft laws were of poor quality (the MSED recommended sending 4 out of 6 of these draft laws back for revision). An important nuance was the position of the Committee on Veterans. This **committee did not support all these draft laws, and it is likely that its position as a key parliamentary stakeholder in this matter was decisive.**

One draft law in the eighth convocation was passed in the first reading (237 votes in favour), but then “stalled” at the stage of preparation for the second reading. It had three signatories and was initiated by a representative of the parliamentary majority. The draft law proposed to “*legislate the provision of one-time non-refundable financial assistance for the development of a business by an individual entrepreneur with a disability sustained as a result of participation in the ATO*”. Despite the relatively explicit need for additional expenditures, the draft law did not contain any calculations on the amount of such expenditures or the sources of their coverage. The MSED recommended that it be returned for revision at the stage of the first reading. It seems that the reason for the failure of this draft law was primarily its quality.

A total of 110 draft laws did not come to the vote at all. 23% (a quarter) of all veteran-related draft laws did not even receive the conclusions of expert and analytical units. Another 54% received various conclusions (rejection, revision or just comments), but were “stalled” at the stage of consideration by either the committee or the Conciliation Board. The draft laws that were not submitted for consideration in the session hall had an average of 3.7 signatories. This is almost one and a half times less than the number of draft laws that were submitted for consideration. Of course, each case had its own story, but the reasons were usually the following: low technical and legal quality, lack/low quality of financial justification for additional expenditures, and weak political support.

4.2. Ninth Convocation

In the ninth convocation, 10¹⁹¹ (19%) out of 52 draft laws reached the voting stage. All of them were adopted¹⁹², nearly all with support at a constitutional majority level. Every draft law was adopted in the second reading, which usually indicates a better elaboration and quality of the text.

190 The initiator of a draft law submitted by MPs is the first signatory (part 3 of Article 90 of the VRU Rules of Procedure). This means that while a draft law may be signed by many MPs, we determine whether it is a coalition (parliamentary majority) or opposition (parliamentary minority) draft law based on the factional affiliation of the initiator—the first signatory.

191 More precisely, 9 draft laws and 1 resolution.

192 We reviewed draft laws registered before 24 February 2022, however two of them were voted on after the full-scale invasion began.

Some of the factors that determined the adoption or non-adoption of veteran-related draft laws in the eighth convocation were also relevant for the ninth convocation.

The authorities had better rates of adoption of draft laws: the only identified presidential draft law was adopted. The share of adopted governmental draft laws is 50%, i.e. every second draft law was adopted. Out of 18 registered veteran-related draft laws, 4 (22%) were adopted by representatives of the parliamentary majority. Among the registered veteran-related draft laws, 4 were also adopted by representatives of the parliamentary minority, but their percentage is smaller and amounts to 13% of the 31 registered draft laws. It is unusual that among the adopted draft laws, **there was not a single one initiated by members of the relevant committee**, although some representatives of the Committee on Social Policy and Protection of Veterans' Rights were among the signatories of these draft laws, however they were not the initiators. That is, the political leadership of this process came from other MPs. Accordingly, there were no typical "committee" draft laws, when a draft law is developed and registered by members of the relevant committee (the initiator in this case is usually the head of the committee or a specialised subcommittee), while in the eighth convocation this situation was quite typical. It should be added that in the ninth convocation, the TSC on the legal status of war veterans was established¹⁹³. This particular TSC was supposed to partially replace a separate veteran committee. At the very least, it was used as a temporary means of compensating for the merger of the veteran and social committees. After the publication of its six-monthly report on its activities, there was no information on the further activities of this TSC.

Another significant difference between the eighth and ninth convocations in terms of legislative work was **the role of minority factions**. In both quantitative and percentage terms, the ninth convocation had more laws initiated by representatives of the parliamentary minority factions. Moreover, all these draft laws were adopted by the constitutional majority.

The ability to involve allies in the process of promoting draft laws remained an important factor in the adoption of draft laws. In fact, this may have been the most important factor. Supporters of a particular draft law managed to convince key government stakeholders of the need for its adoption. The average number of signatories has also increased, which indirectly shows the level of political support for the draft laws - the extent to which stakeholders have reached a consensus. Draft laws that were not put to a vote in the ninth convocation had an average of 6.4 signatories. Adopted draft laws from representatives of minority factions had an average of 8.5 signatories. On the other hand, the draft laws passed by representatives of the majority factions had an average of 19.2 signatories.

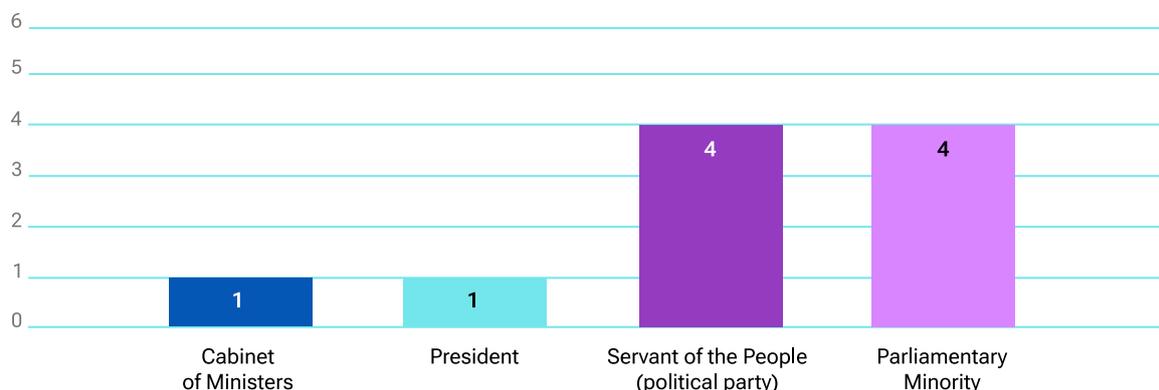
The distribution of initiators of the adopted laws was rather unusual: one draft law each from the Cabinet of Ministers and the President, and four each from representatives of the Servant of the People faction (parliamentary majority) and MPs belonging to the parliamentary minority. The level of support for veteran-related draft laws in the ninth convocation was also remarkable. Out of ten draft laws, only one received 258 votes¹⁹⁴, while the remaining nine were adopted by a constitutional majority. On average, 319 MPs voted in favour of adopting veteran-related draft laws (312 on average before 24 February 2022 and 347 after).

The non-standard distribution of initiators, including the relatively large role of representatives of minority factions, the much greater weight of consensus, and the constitutional level of support for veteran-related draft laws, distinguish the political process of the ninth convocation from the eighth. What could this indicate?

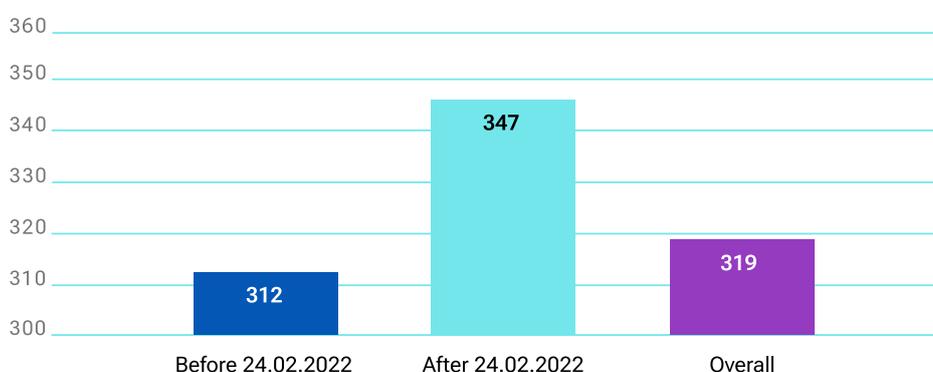
193 On the Establishment of the Temporary Special Commission of the Verkhovna Rada of Ukraine on Legal Protection of War Veterans: Resolution of the Verkhovna Rada of 19.05.2020.

194 Even this draft law is secondary to veteran policy, as its primary focus is on another issue.

Distribution of Initiators of Adopted Laws



Average Number of Votes for Draft Laws

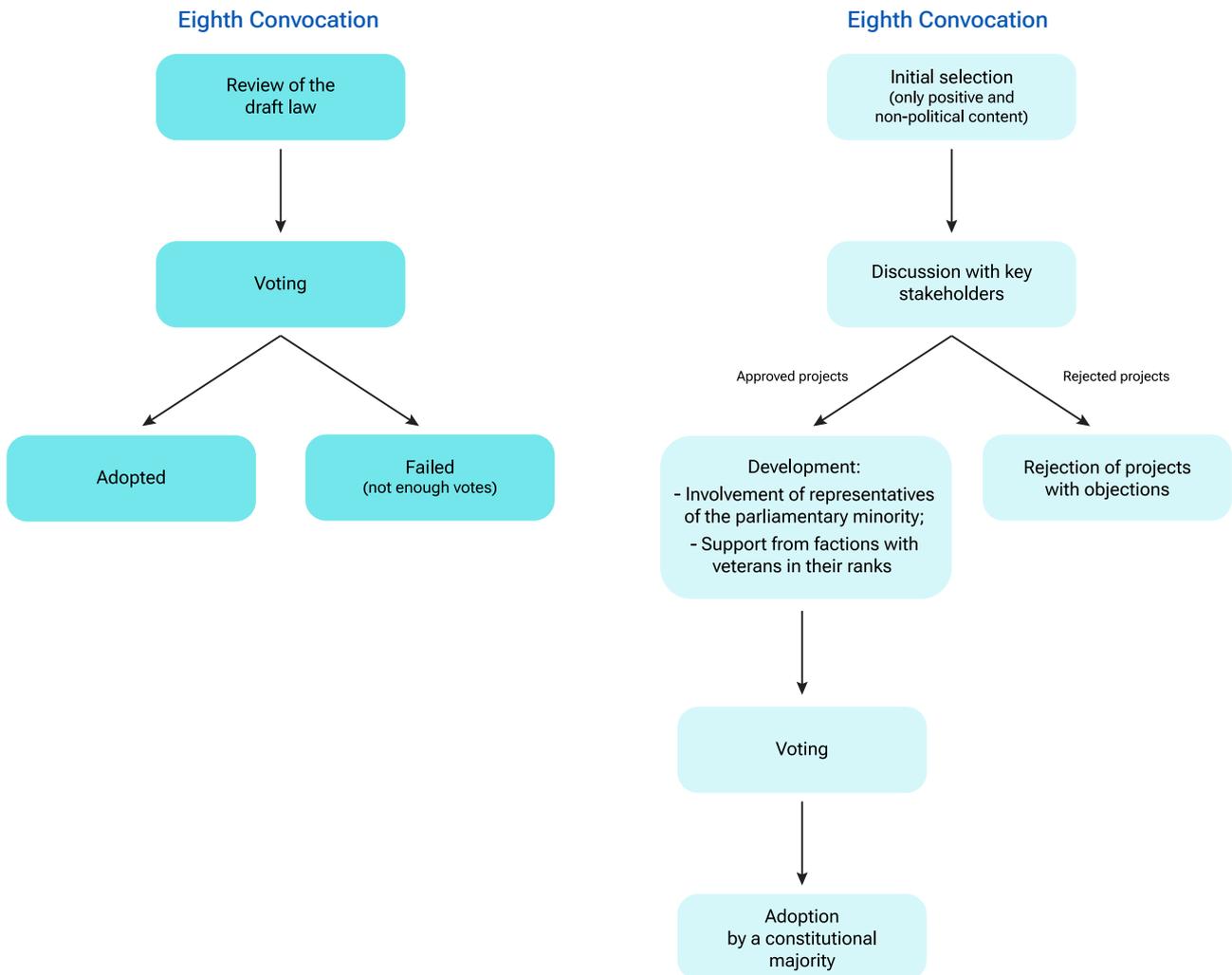


In the ninth convocation, the existence of a single team of authorities, including the President, the Cabinet of Ministers, and a single-factional parliamentary majority, dramatically changed the situation. The number of autonomous actors capable of influencing the adoption or rejection of draft laws has been radically reduced. Previously, in the eighth convocation, such relatively autonomous actors were the President, the Cabinet of Ministers (which also included ministers representing different teams), and several factions. Accordingly, previously, each actor could independently initiate a draft law and gather support from other actors, or vice versa, block an initiative. That is, each individual actor in this process did not have a decisive vote either on the adoption of a draft law or on its blocking. Instead, in the ninth convocation, the ruling team had a decisive vote on both the adoption and blocking of draft laws and even on the submission of draft laws for consideration, discussion, and voting.

In the eighth convocation, veteran-related draft laws were part of the “ordinary” legislative procedure: like other draft laws, they were processed and reviewed by the drafting committee, put to a vote, and could fail or pass with a small margin of votes in favour. In contrast, in the ninth convocation, it seems that veteran-related draft laws became part of **an “extraordinary” legislative procedure**. Only those draft laws that were not opposed by the main stakeholders in the legislative process reached the voting stage. These were either small, unambiguously positive, “non-political” changes, or unambiguously positive draft laws that have a large public approval and are a non-political issue of respect for veterans and restoration of social justice. That is why the motives behind its adoption are different from those behind the adoption of ordinary draft laws on the general agenda. Due to the positive content of the draft laws, representatives of the parliamentary minority often joined in their development. While the presence of a certain number of veterans in almost every faction enhanced

this effect. Therefore, if a draft law did come to a vote, it already gained a significant level of support - a constitutional majority.

Stages of Consideration of Veteran-Related Draft Laws



A significant number of veteran-related draft laws from the parliamentary minority was due to another circumstance: 3 out of 4 adopted veteran-related draft laws were initiated by members of the “European Solidarity” faction. This is a long-term consequence of the 2019 presidential campaign, which was held under the slogans “Army. Language. Faith”. Petro Poroshenko’s parliamentary campaign was generally based on similar slogans, and his faction’s election list included people with greater expertise in veteran affairs. These included veteran Y. Zinkevych and former Minister of Veterans I. Friz. They were the initiators of these draft laws.

The topics of the adopted veteran-related laws of the ninth convocation partially duplicated those of the eighth convocation. Half of the laws concerned the consensus of equal justice (increasing the number of people who can receive certain statuses or granting benefits provided for one status group to people with another status). Another 20% of the adopted draft laws dealt with rather technical issues. At the same time, three initiatives of a different nature were adopted, providing for new tools for implementing veteran policy: 1) the creation of a new branch of sports (sports for war veterans),

2) the introduction of a comprehensive review of the system of social protection for veterans, and
3) enabling veterans with disabilities to receive medical care in departmental facilities of the security and defence sector at public expense.

Why, with a similar share and even fewer registered draft laws, did the ninth convocation adopt slightly more draft laws introducing new veteran policy instruments? This may be due to the “extraordinary” nature of the legislative procedure, combined with the reduced number of autonomous stakeholders who can block the legislative procedure.

The “extraordinary” nature of the legislative procedure and the smaller number of autonomous stakeholders with the right to block do not mean that all veteran policy initiatives are more easily adopted. Rather, it means that those initiatives favoured by the ruling team or those to which it has no objections are adopted more easily, while others fail to even reach the stage of plenary discussion and voting, “stalling” during committee consideration. A characteristic sign of this is that more than half of the veteran-related draft laws of the ninth convocation did not even receive basic opinions from the MSED or the main committee¹⁹⁵.

4.3. Policy Adoption on the Example of Veteran Sports

One of the few areas where comprehensive changes were implemented during President Zelenskyy tenure was veteran sports. All three decision-making centres contributed to the development of this sector. The President approved *the National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans*¹⁹⁶. The Cabinet of Ministers, in turn, adopted the *Action Plan for 2021-2025 to implement the National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans*¹⁹⁷. Meanwhile, the Verkhovna Rada passed a committee-initiated law to establish a separate area of sports dedicated to war veterans¹⁹⁸. Together, these documents aimed at systemic changes in veteran sports. What factors might have contributed to the fact that veteran sports have been so successful?

Veteran sports are an understandable and traceable mechanism for supporting veterans, which can have a public endorsement effect. The need for and importance of veteran sport is easier to communicate and demonstrate. Veterans, often with disabilities, “overcoming themselves” and achieving sporting success - this is an inspiring story that is easy to tell and evokes emotional admiration. At the same time, to get such a picture, you need a clear amount of point resources, namely sports equipment and a team of coaches with psychologists.

Moreover, **much of the administration, expertise, communication, fundraising, process development, and testing of methods and tools was carried out by civil society organisations, including with the support of development partners (donors):**

195 However, this circumstance may also be explained by the shorter time within which such opinions could be provided.

196 Issues of Development of the National System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans: Decree of the President of Ukraine of 23.08.2020 No. 342/2020.

197 On Approval of the Action plan for 2021-2025 for the Implementation of the National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans: Resolution of the Cabinet of Ministers of Ukraine of 30.06.2021 No. 667.

198 On Amendments to the Law of Ukraine “On Physical Culture and Sports” regarding sports of veterans of Ukraine: Draft Law of Ukraine of 20.05.2021 No. 5526.

“For example, sports. Here’s how it works. An NGO introduced these projects to Ukraine. Initially, they handed them over to the Ministry of Defence, but the NGO continued to run the projects under the Ministry’s umbrella. Then, the Ministry of Veterans emerged. The NGO shifted the projects to the Ministry. The Ministry now reports how well everything is going. The NGOs look for additional funding, do all the hands-on work, manage the projects, while the Ministry oversees the project”

The prominent role of the public sector, in particular with the support of development partners (donors), in the organisation of veteran sports also resulted **in a limited need for state budget funding**. Accordingly, there was less resistance from the stakeholders responsible for forming the state budget, as there was less necessity to reallocate existing expenditures.

Veteran sports became **a new area of veteran policy**. Accordingly, there were no existing stakeholders¹⁹⁹ who could resist changing the rules or redistributing funds within the policy area. In other words, creating new institutions and entities is easier than altering existing ones.

Given the political configuration during the ninth convocation of the Verkhovna Rada, it was also important that the direction of veteran sports received political approval from the President. By his decree, V. Zelenskyy approved the Strategy, which was followed by the Government’s Action Plan and later by legislative changes on veteran sports in the Verkhovna Rada²⁰⁰.

4.4. History of the Ministry of Veterans Affairs

The process of establishing the Ministry of Veterans Affairs can be viewed in at least two dimensions - the institutional dimension and the dimension of political struggle.

4.4.1. Institutional Dimension

In 2017-2018, a strong consensus was formed among the veteran community, the public, government agencies and other stakeholders on the need to change the current veteran policy. Two key, closely related areas of focus were identified: 1) the development of a new policy and 2) the establishment of a new body to deal with veteran policy. These are not mutually exclusive areas, but there were quite different, sometimes opposing interpretations of how the policy should be formed and what the new body should do. The Ministry of Veterans eventually became the new body. Different stakeholders and experts had **different expectations** for it. Based on the results of the interviews conducted as part of the study, the following typical expectations of stakeholders can be identified:

- Formulation of a new veteran policy and new legislation (this large task included many smaller ones described below).

199 For example, there is the sphere of health resort treatment, or the provision of medical services in specialised hospitals, or the housing system. These areas already have service providers, an administration system, regular users of these services, etc. These stakeholders may be against certain changes in the rules.

200 At the same time, according to some respondents, the adoption of this Strategy was also due to a combination of circumstances: *“The National Strategy for Sports Rehabilitation. [...] on Independence Day, the Presidential Commissioner [...] felt his chair shaking under him. He quickly decided to make such a National Strategy so that the President would have his authorship. [...] what they wrote is impossible to implement. Absolutely. [...] Nevertheless, they gave it to the President, and he signed it. And then everything was brought down to the level of the Cabinet of Ministers to be implemented. [...] This is a document that makes no sense whatsoever.”*

4. POLICY ADOPTION

- Expanding the scope of veteran policy beyond social protection alone (including a general change in approach - development and opportunities for veterans instead of passive receipt of state assistance).
- [Re]forming²⁰¹ the veteran policy that is implemented locally (in the regions).
- [Re]forming a system of medical care, including psychological assistance.
- [Re]forming social support for veterans.
- [Re]forming a system of employment for veterans.
- [Re]forming the policy of honouring veterans.
- Building a unified information system “E-Veteran”.
- Creating a system of transition from military career to civilian life.

The formal and regulatory need for the creation of the Ministry of Veterans was driven by the fact that the **State Service did not have the authority to formulate veteran policy** (although it had the authority to make proposals on policy development). Instead, the State Service was only supposed to implement the policy that would be formed by other institutions (the Verkhovna Rada, the President, the Cabinet of Ministers, including the Ministry of Social Policy, to which the State Service was supposed to submit proposals for consideration). Accordingly, in response to any complaints from society about the absence of policy, the State Service could provide a standard and flawless (in bureaucratic logic) answer: “This is not within our mandate”. The State Service, in particular its leadership, could have taken a proactive stance and joined the policymaking process both within its powers by submitting proposals to the Ministry of Social Policy and with the involvement of MPs. However, the State Service did not take such a proactive position, so the Ministry of Veterans, which has the appropriate powers, was called upon to address the lack of leadership in the policymaking process.

The establishment of the Ministry would have addressed several other issues. The Ministry of Veterans was supposed to be a solution to the problem of low institutional capacity of the body responsible for veteran policy. This low capacity had several manifestations. As of 2018, the maximum number of employees of the State Service was 115²⁰². The Service’s mandate did not include policymaking:

“...it was necessary to change policies, and the State Service for War Veterans could not do this either in terms of resources or even function. They simply implemented certain budget programmes, provided some services, paid for NGOs to visit places of military glory from the Second World War”

The State Service personnel policy has often been in the field of political confrontation:

“A [large] number of protests that took place around the State Service for War Veterans and the appointment of the heads of this service. It was constantly accompanied by some kind of protests, because there were different groups of veterans or organisations that tried to play around with the situation”

201 The use of square brackets in the word “[re]forming” is due to the different views of stakeholders on the current state of a particular policy area and what needs to be done about it: there are even opinions that, for example, there is no system of employment for veterans, so it needs to be formed.

202 Certain Issues of Approval of the Maximum Number of Employees in the Apparatus and Territorial Bodies of Central Executive Authorities and Other State Bodies: Resolution of the Cabinet of Ministers of Ukraine of 5.04.2014 No. 85.

4. POLICY ADOPTION

In other words, weak institutional capacity was seen as one of the reasons for the inability of the State Service to formulate a veteran policy. Accordingly, an increase in institutional capacity should have helped to formulate such a policy.

The ministries have the status of key budget holders, which then transfer funds to lower-level spending units. The State Service of Ukraine for War Veterans and Participants of the Anti-Terrorist Operation was such a body that received funds from the Ministry of Social Policy. Therefore, the creation of a ministry would allow the body responsible for veteran policy to **receive funds directly from the budget, rather than through another key budget holder**:

“The minister has a completely different status and funding [...]. The [ministry is] the main budget holder, and the others are lower-level spending units, and they receive funding through the [ministry] [...] It’s a big difference when there is someone else on the way to the Cabinet of Ministers”

The idea of separating veteran policy from the Ministry of Social Policy was based not only on considerations of budget allocation, but also on the **idea of moving veteran policy beyond the system of benefits**.

“The Ministry of Social Policy worked like a calculator: benefit-calculation-payment - for all its social categories. Veterans were not part of this model. A veteran was a social group that had to be constantly worked with in a dynamic way. It was changing in dynamics, it was moving. The Ministry of Social Policy had no algorithm for such work”

Perhaps the problems outlined above could have been solved in a way that did not require the creation of the Ministry of Veterans. However, **the international experience played an important role** here, which was relied upon and constantly cited as an argument for the creation of the Ukrainian Ministry of Veterans Affairs. The benchmark for international experience was the U.S. Department of Veterans Affairs, although the experience of other countries was also studied:

“...we studied the experience of six countries. The main ones for us were the USA, Australia, and Croatia. [...] In the US, the Ministry of Veterans has the second budget after the Ministry of Defence”; “it was also part of the borrowing, so to speak. From the international experience that the US has a Ministry of Veterans”

Thus, the creation of the Ministry of Veterans Affairs in the institutional dimension **was supposed to solve the problems of low institutional capacity of the State Service for War Veterans, shortcomings of its funding mechanism and the departure from the privileged nature of the policy**. Stakeholders saw the solution to these problems in imitating the American model - the establishment of the Ministry of Veterans Affairs.

Not all stakeholders and experts supported the decision to establish the Ministry of Veterans. Some of them were critical of the idea. One of the key arguments was that the legal framework was outdated: **if the legislation is old, the creation of new bodies will not improve policy**. Therefore, new legislation would first need to be adopted, and then there might even be no need to create new bodies (the

Ministry of Veterans as a body for policy/legislation would become unnecessary once such policy/legislation is actually in place):

"I was against the creation of the Ministry of Veterans. [...] Any institution is a tool for achieving a certain goal of the state. You have a law on social protection of veterans that is as outdated as mammoth shit. Even the State Service works well under this law, because no matter what you name the ship, you can create state-owned enterprises, State Services, ministries, and even create a separate Cabinet for veterans - they will still be subject to this law. No matter who you create, it will be a structure that implements this law, so you first need to create a new law. Then, within that law, you will see what level of institutions are needed to support it"

To a certain extent, the two competing arguments (new legislation first, then a new body, or a new body - the Ministry of Veterans - first, then new legislation) resemble the philosophical dilemma of "chicken or egg". **In the end, the supporters of a separate ministry won.**

4.4.2. The Political Dimension

The institutional dimension of the creation of the Ministry of Veterans cannot fully explain the reasons for its establishment. The institutional dimension is more about ideal rationality. Nevertheless, the Ministry was created in the real world, where there is political conjuncture, where real politics and political struggle exist. In other words, the "chicken or the egg" dilemma may not have been decisive, but the electoral appeal of the "chicken" and **the coincidence of civil society's demand for the creation of the Ministry with the interests of government officials were more important.**

For a better understanding of the political dimension of the creation of the Ministry of Veterans, it is necessary to recall the context, namely, the main events of the end of 2018. On 26 November 2018, the VRU adopted a resolution on the appointment of the next presidential elections in Ukraine²⁰³. On the same day, 26 November, the President issued a decree on the introduction of martial law in 10 regions, and the VRU approves this decision²⁰⁴. On 28 November, the Cabinet of Ministers liquidated the State Service and establishes the Ministry of Veterans Affairs of Ukraine²⁰⁵. On 5 December the Cabinet of Ministers approved the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation²⁰⁶. On 18 December, the Constitutional Court issued a ruling in the case regarding social protection of war veterans and their families²⁰⁷.

203 On the Appointment of Regular Presidential Elections in Ukraine: Resolution of the Verkhovna Rada of Ukraine of 26.11.2018 No. 2631-VIII.

204 On the Introduction of Martial Law in Ukraine: Decree of the President of Ukraine of 28.11.2018 No. 393/2018.

205 On Issues Related to the Ministry of Veterans Affairs of Ukraine: Resolution of the Cabinet of Ministers of Ukraine of 28.11.2018 No. 986.

206 On Approval of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of the Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022: Resolution of the Cabinet of Ministers of Ukraine of 5.12.2018 No. 1021.

207 Decision of the Constitutional Court of Ukraine in the case of social protection of war veterans and members of their families of 18.12.2018 No. 12-r/2018.

This rather eventful period²⁰⁸ can be considered a watershed between the second and third periods of veteran policy.

Civil society played an important role in the creation of the Ministry of Veterans. In 2018, an extensive information campaign was conducted to support the creation of the Ministry. Civil society organisations, with the involvement of part of the veteran community and some government officials, promoted this idea at the level of both the Verkhovna Rada and the Cabinet of Ministers. Some veterans were sceptical about the idea of creating the Ministry: *“veterans all said that it would be a new body that would be engaged in budgetary siphoning, and that no changes would take place.”* Communication and advocacy campaigns were conducted with opponents of the Ministry of Veterans to minimise their opposition to the idea. A part of the veteran community also had doubts about the candidacy of the first minister, a civilian, Iryna Friz (at the time of her appointment, she was an MP from the Petro Poroshenko Bloc faction): *“that was the key critical thing, the difficulty [...] of opposing the appointment of a civilian”*, but thanks to good communication, these doubts were also minimised. Communication between the supporters of the Ministry of Veterans and the veteran community later led to the creation of the Council of Veterans at the Ministry of Veterans, an advisory body that included representatives of the veteran community.

By combining the interests and efforts of stakeholders from the public sector and government institutions, actions in support of the creation of the Ministry were held, as well as roundtables and meetings, and eventually a Project Office was established. On the part of the government, **the main role in the creation of the Ministry was played by the Committee for Veterans** and Persons with Disabilities and its then head, O. Tretiakov. Thus, if we look at the process of creating the Ministry in the “positive light” of political struggle, this process can be summarised as a request from society that was eventually satisfied by the authorities:

“...it was more an initiative of civil society organisations that, studying the experience of other countries, understood that a country in a state of armed conflict that offers nothing to people returning home will have terrible socio-political consequences. Lesia Vasylenko, who was actively involved in the creation of the Ministry of Veterans with her NGO at the time, and other NGOs that united and pushed for the creation of the Ministry through the relevant Committee on Veterans, through the then head Tretiakov. They reached out or reached an understanding, you can call it whatever you want, but this process gained synergy due to the input from both veteran organisations, NGOs that provided services to veterans at the time, and the legislative branch of government”

208 In addition to the events already mentioned, the following is worth noting:

In late 2018 and early 2019, Petro Poroshenko and his team made several decisions in Ukraine's cultural, international and veteran policy. One of the main events in Ukraine in 2018 was the granting of the Tomos to the Orthodox Church of Ukraine. Petro Poroshenko took an active part in negotiations with the Ecumenical Patriarchate on obtaining Ukrainian autocephaly. On 15 December 2018, the Unification Council of the Orthodox Churches of Ukraine was held, at which Epifanii was elected Metropolitan of Kyiv and All Ukraine. On 26 December 2018, Petro Poroshenko signed draft law No. 5309 of 26.10.2016, which obliged the UOC-MP to indicate its connection with the aggressor country (the Russian Federation) in its name. On 5 January 2019, the Ecumenical Patriarch signed the Tomos of the Orthodox Church of Ukraine. In September 2018, the President of Ukraine registered draft law No. 9037 of 03.09.2018 on enshrining Ukraine's movement towards NATO and EU membership in the Constitution of Ukraine, and in early February 2019, this draft law was adopted. On 4 October 2018, the Verkhovna Rada adopted the law on language (5670-d of 09.06.2017) as a basis. Also in December 2018, the President of Ukraine signed a draft law on the termination of the Treaty of Friendship, Cooperation and Partnership between Ukraine and the Russian Federation (draft law No. 0206 of 03.12.2018) and granting combatant status to representatives of armed units of the OUN, UIA and other formations that participated in the struggle for Ukraine's independence in the twentieth century.

There was another side to the coin. For the authorities, the creation of the **Ministry of Veterans** was (or at least was gradually seen as) beneficial for several reasons: **electoral considerations, channeling public discontent, and establishing control over the veteran movement.**

The electoral considerations for the creation of the Ministry of Veterans in 2018 were driven by the approach of the 2019 presidential election. The Ministry was created six months before the election day and several months before the official election campaign began. The most obvious electoral benefit from the creation of the Ministry was the simple satisfaction of a public demand - the mere adoption of any decision that voters want adds several electoral points to the incumbent candidate, which can then be converted into votes.

There were also more important electoral considerations. The decision to create the Ministry fit perfectly into the election strategy under the slogan “Army. Language. Faith”. The transformation of the State Service into the Ministry of Veterans Affairs was presented as increased attention and care for veterans. This was supposed to be perceived positively by those voters who prioritise support for the army and defence capability, as well as those who are veterans themselves or are involved in the veteran movement:

“...it cannot be said that it was exclusively a request from the public, because there were a lot of requests at that time, but this one was satisfied, during Petro Oleksiiovych's term. [...] For Petro Oleksiiovych, it was also a political decision to show his inclination towards this group. Later, in my subjective opinion, we see confirmation that, in principle, this group is interesting to him politically. More than in terms of truly disinterested support or something like that”

Due to this²⁰⁹, the pro-government candidate in the presidential race was to be positioned as a defender of Ukraine, who, together with veterans (also defenders of Ukraine), was opposing Putin.

The **channelling of public discontent** was partly related to electoral considerations, but not limited to them. The creation of the Ministry of Veterans provided a specific addressee for the complaints of the veteran movement, which as of 2018 had already managed to gain some public weight and become institutionalised. During the existence of the State Service for War Veterans and Participants of the Anti-Terrorist Operation, there were constant protests. These complaints and protests had a negative impact on both the Ministry of Social Policy and the Cabinet of Ministers in general. The creation of a separate ministry for veterans could channel public discontent, directing it to this ministry and removing other stakeholders from the public outcry:

“In 2018, the number of veterans increased significantly. Everyone went to the Verkhovna Rada and to rallies. The government wanted to direct these people to a different address. Here is the address where you can all go and get all the answers”

The desire to establish **centralised oversight of the veteran movement** was driven by both the desire to involve the veteran movement in the election campaign and the attempt to prevent the movement from becoming radicalised or from being drawn into supporting other political forces:

²⁰⁹ Certainly, the positioning in the election race was not achieved solely through the creation of the Ministry of Veterans, there were many other measures, but the creation of the Ministry of Veterans was not the least among them.

"...in Porokh's circles, the idea of creating the Ministry of Veterans was that they would be able to create a central body that would be tasked with controlling and centralising veterans"

Another advantage of centralised control is the availability of clear partners for negotiations, representatives with whom one can negotiate. For example, the situation with the movement of Afghanistan veterans was quite convenient and understandable, as it was actually united into two large organisations - the All-Ukrainian Association of Afghan Veterans and the Ukrainian Union of Afghan Veterans. At the same time, there were ten times more organisations of ATO/JFO veterans.

It is worth emphasising that there is nothing wrong with the fact that the interests of civil society and government representatives coincide:

"...For the grant-seekers who cooperated with the US, it was an opportunity to establish themselves at the US State Department on veteran issues. At that time, Sasha Tretiakov was the head of the parliamentary committee on veterans' affairs. They saw this as an opportunity to centralise veterans as such, because before that they had made very aggressive attempts to bring the veteran movement under their control"

Different actors play their own roles in the political process, and decision-making is often driven by broad coalitions and convergence of interests.

Thus, the creation of the Ministry of Veterans was a combination of the efforts of civil society and P. Poroshenko's team, including the head of the relevant parliamentary committee, O. Tretiakov. Finally, it is important to emphasise that the Cabinet of Ministers of Ukraine had the least initiative in creating the Ministry of Veterans. Neither the Government Programme of Activities of V. Groysman nor the Government Priority Action Plan for 2018 mentioned the creation of the Ministry of Veterans (the creation of the Ministry was not in any of the annual Priority Action Plans), nor the adoption of the State Target Rehabilitation Programme. In other words, the government did not plan to create the Ministry of Veterans, but it was the government that, at least formally, created the Ministry. This demonstrates the crucial role of other actors in the political process.

If we overlay the political motivations behind the creation of the Ministry of Veterans with institutional logic, an interesting situation arises. A significant number of stakeholders (primarily government officials) saw the **creation of the Ministry of Veterans as an end in itself**. For them, the Ministry was meant to be merely a politically prestigious body without needing a well-defined functionality or tools to address the issues of veteran policy. The Ministry of Veterans was supposed to just do something for veterans and accumulate all the negative effects of imperfect policy. Before accumulating negativity, the Ministry should have also brought positive results in the form of electoral bonuses ahead of the 2019 presidential election. Veterans were a politically significant group both in terms of their own constituency and society's perception. Accordingly, the creation of the Ministry of Veterans was perceived as a symbolic and political step, an attempt to demonstrate the state's intention to engage with veterans and implement some form of veteran policy:

"...it turns out that instead of creating an effective instrument, they created a rather shaky politically prestigious body. With insufficient elaboration of mechanisms within the existing system of the Cabinet of Ministers. Therefore, it turned

out that, in fact, instead of being the determining body of state policy on the topic of veterans, it is now a body that is not a determining body of state policy”

The political aspects of the creation of the Ministry affected its further development. The Ministry of Veterans was effectively held hostage to political struggles and election campaigns, resulting in a highly unstable first year of operation. Beyond the use of the Ministry in P. Poroshenko’s election strategy, the Minister for Veterans Affairs was also a member of the fifth President’s team, who was elected as a member of Parliament of the ninth convocation from the “European Solidarity” party. Zelenskyy was reportedly dissatisfied with this situation, and according to stakeholders, “it was heading to the point where the Ministry was going to be liquidated.” Moreover, after the end of the 2019 presidential campaign, veteran issues were used in the 2019 summer parliamentary campaign and subsequent events. A striking example of this was the various veteran marches used in the promotional videos of the “European Solidarity” party²¹⁰. Even though veteran organisations distanced themselves from P. Poroshenko and his political force, the media largely framed them in association with his political force^{211, 212}.

The decisive event that prevented the liquidation of the Ministry was **the 2019 Veterans Forum**, held shortly before Independence Day and a week prior to the commencement of the ninth convocation of the Verkhovna Rada, which was set to form a new Cabinet. At this forum, Volodymyr Zelensky, aiming to dispel rumours, publicly promised not to dismantle Ministry of Veterans²¹³ and asked for a suitable candidate to lead the Ministry. This candidate became O. Kolyada, who had previously served as Deputy Minister under I. Friz. However, she was an outsider to V. Zelenskyy’s team, therefore she did not have internal political support for her initiatives. In fact, the story of the Ministry of Veterans as an end in itself was repeated. It was not dissolved to avoid public dissatisfaction, but it was not given the political support it needed to formulate a state veteran policy.

The “extraordinary” nature of decision-making in veteran policy was not least due to the history of the creation of the Ministry of Veterans and subsequent political dynamics. **The involvement of unrelated topics and individuals in ministerial positions led to the fact that changes in veteran policy were rather limited** and part of a non-political agenda. However, when there was political will for these changes, decisions received a constitutional majority of votes.

4.5. Approval of Strategic Policy Planning Documents

The process of approving veteran policy decisions at the governmental and presidential levels is relatively closed and poorly documented, so we have not considered these processes in this chapter. In the chapter on veteran sports, we have outlined the factors that led to the adoption of the *National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation for War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans*²¹⁴ and the relevant governmental Action Plan. Therefore, it is also worth briefly considering the approval of the *State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional*

210 European Solidarity. Our Goal - to Build Europe in Ukraine. 2020.

211 Parade, procession, march: is the country being divided on Independence Day?

212 How veterans clashed again over Poroshenko: “Sabotage”, “Yermak’s hand” and “Russian masters” // hromadske.

213 Zelenskyy Participates in the II International Volunteer and Veterans’ Forum. 2019 // hromadske.

214 Issues of Development of the National System for Physical and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans: Decree of the President of Ukraine of 23.08.2020 No. 342/2020.

*Rehabilitation of Anti-Terrorist Operation Participants and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022*²¹⁵.

The target rehabilitation programme was adopted on 5 December 2018. The idea of its creation was not new. Back in 2014, it was planned to be developed, and then in the first half of 2015, it was supposed to be approved²¹⁶. This did not happen in 2015 or 2016. And in 2017, the Concept of such a programme was approved²¹⁷. Finally, at the end of 2018, with a four-year delay, the Programme itself was approved. It is worth noting that the Programme was approved by the Cabinet of Ministers, and there was no need to collect 226+ votes of MPs.

The timing of the Programme's approval is important - a week after the Ministry of Veterans was established. This, in turn, indicates the nature and reasons for the decision to approve this Programme. It seems that the Programme was part of a veterans' package of decisions and was adopted for the same reasons as the Ministry of Veterans: the request of civil society coincided with electoral considerations.

The approval of the Programme in one package with the establishment of the Ministry of Veterans and the specifics of the approval of the Strategy for Physical Culture and Sports Rehabilitation and related documents demonstrate two important characteristics of the stage of veteran policy adoption. Firstly, in both cases, the adoption of these documents was largely due to a favourable set of circumstances rather than planned work on the development of veteran policy. Secondly, in both cases, the initiative (general political approval) came from the President, and the Cabinet of Ministers responded to this by approving the policy documents. In other words, the Cabinet of Ministers, which had a veteran focus in its annual planning documents and included the Ministry of Veterans, approved policies reactively, only in response to external requests from the public and the President. This, in turn, indicates that veteran policy issues were not part of the real government-wide political agenda (although they could have been part of the formal one).

4.6. Issues with Policy Adoption

At the stage of veteran policy adoption, as at other stages, numerous challenges arose, limiting the scope of solutions to reform the veteran policy.

Some of the reasons for the non-approval of the policy have been transferred to this stage from the previous stages. Society had long deprioritised the importance of veteran policy, leading stakeholders to pay it less attention, and making it harder to advocate for this policy and overcome stakeholder vetoes. The lack of consensus on the basic issues to be addressed by the veteran policy also further complicated the lobbying process. In addition to low prioritisation and lack of consensus on basic issues, a significant number of draft laws were not adopted due to the poor quality of their deve-

215 On Approval of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of the Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022: Resolution of the Cabinet of Ministers of Ukraine of 5.12.2018 No. 1021.

216 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine of 11.12.2014 No. 26-VIII.

217 On Approval of the Concept of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression by the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation for the Period until 2022: Order of the Cabinet of Ministers of Ukraine of 12.07.2017 No. 475-r.

lopment. This applies to both the imperfect content of the changes proposed in the draft laws and the sometimes poor technical and legal quality. The low quality made lobbying more difficult and strengthened the legitimacy of the positions of stakeholders who wanted to block changes in veteran policy.

Veteran policy did not have a powerful lobbyist, a centre that would purposefully and efficiently develop and promote veteran policy: *“there is no political will for this. In my opinion, the lobbyist at the level of the Cabinet of Ministers has disappeared.”* At the legislative level, MPs remained the main policymakers throughout the period of 2014-2022.

The number of draft laws registered by MPs, as well as the number of laws initiated by them, significantly exceeded the figures for the Cabinet of Ministers and the President. At the same time, among the three entities with legislative initiative, MPs are the weakest lobbyists, as they have less expertise and less potential for political coordination and support. During the eighth convocation, the main body responsible for the development of veteran policy was the Committee on Veterans and Persons with Disabilities, but this Committee focused its work on point improvements to the existing legislative framework for almost the entire eighth convocation rather than producing systemic changes (here, the problems of the previous stages of the policy cycle affected the stage of policy adoption). In the ninth convocation, it was decided not to form a separate Committee on Veterans, but instead to include the “traditional” subjects of this committee’s jurisdiction in the Committee on Social Policy. The focus of the new, “merged” Committee shifted away from veteran issues, as evidenced by the decrease in the number of veteran-related draft laws registered by committee members and a drastic decline in the number of adopted veteran-related laws initiated by representatives of this committee. The “committee-originated” veteran-related laws²¹⁸ disappeared entirely during the ninth convocation.

The Committee on Veterans of the eighth convocation was supposed to leave a legacy in the form of a new centre for veteran policymaking. It was the head of this committee, O. Tretiakov, who played a key role in the creation of the Ministry of Veterans, which was supposed to become the centre for the development of a new veteran policy. However, the Ministry failed to play the role of a strong lobbyist for veteran policy:

“That is, there is no powerful team headed by a minister who would constantly keep the issues of veterans and their families in sight”

As a lobbyist, the Ministry of Veterans also failed to ensure coordination of veteran policy with the most important stakeholders and, accordingly, to secure their support to promote and approve its initiatives: *“The Ministry is not able to convey its perspective to the Presidential Administration”*. Over the analysed period²¹⁹, the Ministry developed and submitted²²⁰ five draft laws, of which only one became law. Several systemic draft laws developed with the participation of the Ministry’s representatives and initiated by MPs did not even reach the stage of voting in the VRU. Key reasons for Ministry of Veterans inability to effectively promote veteran policy include the low institutional capacity of the Ministry²²¹ and the appointment of individuals who did not belong to Zelenskyy’s political team. In addition, the situational coincidence of interests of civil society and government representatives was in the creation of the Ministry of Veterans, not in its further effective work on shaping veteran policy.

218 This term refers to an adopted draft law that was initiated by a representative of the relevant committee (usually the head) and [usually] signed by a majority of the committee members. As a rule, this indicates that the draft law was drafted by members of the committee.

219 That is, until 24 February 2022.

220 This refers to draft laws formally initiated by the government.

221 More details presented in the next chapter.

The Accounting Chamber also drew attention to the insufficient role of the Ministry of Veterans: *“the leading role in addressing the problems of the Defenders of Ukraine belongs not to the Ministry of Veterans, which is the authorised state body in the field of social protection of veterans and persons equated to them, but to other interested state bodies, public and international organisations, volunteers and other concerned parties”*²²².

In addition to government agencies, the public sector, including veteran service organisations and veteran associations, played an important role in lobbying for veterans’ initiatives:

“I would say that it was overwhelmingly the civil society sector that was the solution provider. [...] my subjective perception is that the public sector has done the most”

They advocated for changes in veteran policy at both the parliamentary and governmental levels during both the eighth and ninth convocations of the VRU. However, the civil society sector could not replace MPs or the government. The civil society sector is not part of the system; it can demand that the authorities make decisions, but it cannot adopt them or even initiate them; its influence on decision-making is indirect. In addition, the civil society sector is out of the system not only in terms of decision-making, but also in terms of political struggle. It does not belong to the political team of the authorities. Moreover, the veteran part of the civil society sector could even be perceived negatively by V. Zelenskyy’s team because of its support for the appointment of I. Friz (who belongs to P. Poroshenko’s political team) and O. Kolyada (who was Deputy Minister for Veterans Affairs under I. Friz) as the first Minister for Veterans Affairs. The demands generated by the civil society sector were narrow and niche, and these demands were not transformed into a broader public demand and did not receive broad public support.

In some ways, **the active role of the civil society sector has even somewhat hindered the strengthening of other decision-making actors.** The problem of the low institutional capacity of some government agencies responsible for veteran policy was perpetuated because the civil society sector performed some of the functions of these agencies. In a sense, it was a vicious circle: the civil society sector performed the functions of the government because the government was inactive and did not address the urgent problems of veterans, having low institutional capacity, and the government did not develop its institutional capacity and was inactive because the civil society sector was already doing the work that the government could do:

“Various NGOs, business representatives, business schools, and all stakeholders gather, with a representative of the ministry present. He takes notes on everything, these 10 stakeholders check that everything is written correctly, after which it is submitted for approval. Who did this? The Ministry of Veterans, as if they developed it. [...] There are large organisations that want to do something on a mass scale. They do it at the expense of a donor. At some point, it became important for the donor that the Ministry of Veterans providing direction - we are heading this way, these are the NGOs willing to help. Donors even began requesting letters of approval from the Ministry of Veterans confirming that we have a plan, this NGO will be doing this and that. So, while the plan exists, the actual work - this and that - is still carried out by the NGOs”

²²² Report of the Accounting Chamber of 06.06.2023 No. 12-5 “On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine”.

The public sector also played a significant role at other stages of the veteran policy, in particular at the stage of its implementation.

The strong role of vetoing stakeholders has led to the fact that the adopted laws in the field of veteran policy almost exclusively involve a consensus of equal justice - different political actors do not object to the fact that the benefits of one category are extended to another category, as it is injustice to have benefits for one category of people and not for another. In other words, changes in veteran policy consisted (almost exclusively) of its expansion - the extensive addition of new categories to the existing rules. Moreover, this process was self-reinforcing. New stakeholders were added to the old rules, and changing these old rules required the involvement (consultations, approvals, etc.) of these new stakeholders, which, in turn, made it difficult to change the old rules in a meaningful way.

Part of the problem of the large role of vetoing stakeholders is due to the lack of a powerful lobbyist for veterans' initiatives. When there is no powerful lobbyist, it is difficult to overcome objections to the adoption of new veterans' initiatives.

The role of blocking stakeholders was partly due to the outdated nature of the veteran policy. Over the twenty years of its existence, this policy has "overgrown" with a well-established system of implementation, which consisted of providers of benefits and services, their recipients (both individual and united in associations), and the administrative apparatus. In general, veteran policy is *"implemented by 22 central executive bodies, which are guided in their activities by 156 regulatory legal acts"*²²³. They have established relationships between them, and sometimes these relationships are corrupt:

"...the social service bought [apartments]. There are so many kickbacks and scandals"; "it [the large number of declarative benefits] is like a leaky bucket. This is inefficient use, corruption"

Therefore, changing such established relationships between a large number of stakeholders required considerable effort. Unlike civil society, these stakeholders are inside the system and have access to decision-makers.

The blocking stakeholders could easily support their arguments with the decision of the Constitutional Court, and the CCU's decision in late 2018 only updated the strength of the argument about the minimal opportunities for reviewing veteran policy in general and legislation in particular.

Limited opportunities to revise old rules and regulations mean limited opportunities to reallocate the resources needed to service those old rules and regulations. Therefore, the introduction of new rules and regulations requires [due to the inability to attract the resources needed to service the old rules] significant new resources that are difficult to find. There was no consensus on the need for a significant reallocation of financial resources to veteran policy at the expense of other areas. The desire of some stakeholders (such as ministries) to allocate their resources to other areas (such as veteran policy) is usually absent. All this, in turn, leads to a negative position of stakeholders responsible for formulating financial and budgetary policy. The lack of consent to reallocate resources can be overcome if there is a powerful lobbyist for such a decision. The position of the President, for example, can overcome the blocking efforts of other stakeholders, including financial ones, but there was no such lobbyist and no such position.

The impact of political struggles on veteran policy has repeatedly had negative consequences. During the eighth convocation, veteran issues were part of the "ordinary" agenda: there were many

²²³ On the Preliminary Report of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the Legal Status of War Veterans for the Six Months of Activity: Resolution of the Verkhovna Rada of Ukraine of 03.06.2020 No. 659-IX.

access points for initiatives related to veteran policy to go through all stages of preliminary processing, review and voting. A negative manifestation²²⁴ of this was that some draft laws initiated by representatives of the parliamentary minority were blocked by representatives of the parliamentary majority, particularly through the Committee on Veterans.

As the 2019 presidential election approached, veteran issues began to be used in political struggles, becoming an integral part of the “Army. Language. Faith” electoral strategy. Six months before the election day, the Ministry of Veterans was established. However, all these steps did not help the pro-government candidate to mobilise enough voters for support. His opponent won, subsequently calling parliamentary elections and receiving a one-party parliamentary majority, which allowed him to independently form the Cabinet of Ministers. This created a situation where, instead of many autonomous stakeholders and points of access to decision-making, everything became dependent on one political team. Veteran issues and the first two heads of the Ministry of Veterans were external to this team, so the direction of creating a veteran policy was not supported by the ordinary political agenda. The next two ministers, although not connected to the previous political team, were also quite distant to Zelensky’s team. Accordingly, it was difficult for them to gain political support for their initiatives.

During the ninth convocation, the nature of decision-making in veteran policy changed to an “extraordinary” mode: the draft laws that came to the vote were assessed as non-political (non-political in the sense of outside the political struggle), as necessary to establish justice, make life easier and honour veterans. The adoption or blocking of a draft law depended solely on the will of the ruling team. Therefore, most draft laws simply “stalled” at the stage of preliminary processing - in committees, expert units or at the stage of the Conciliation Board. Only those that were expected to have support in the parliament came to a vote. They were almost always adopted by a constitutional majority. This state of play opened more opportunities for representatives of the parliamentary minority factions (who also had more expertise in veteran policy) to initiate and promote their draft laws. Nevertheless, the exclusion of veteran issues from the regular political agenda limited the opportunities for systemic reform of veteran policy. The main actor on whom the adoption or non-adoption of draft laws depended on had little interest in promoting veteran-related draft laws.

Thus, the problems with the approval of initiatives to change the veteran policy were caused by the fact that such initiatives were mostly **low-priority, uncoordinated, of low technical and legal quality, lacked a powerful lobby, but had numerous internal detractors and a taste of politicisation.**

²²⁴ However, this state of play also had positive aspects, which are described in detail in Chapter 4.1. “The Eighth Convocation”.

5. Policy Implementation

The stage of policy implementation involves the direct execution of policies, where executive authorities, within the limits of their powers, implement what has been outlined in strategies and/or other regulatory acts. In other words, this chapter aims to address the question “How was the developed and approved policy implemented and what challenges were faced during its implementation?”.

Before moving on to the analysis of policy implementation, a methodological remark is necessary. Between 2014 and 2022, executive authorities adopted a large number of NLAs: instructions, regulations, procedures, etc. (or amendments thereto). If these documents were adopted to implement a programme, strategy, plan, or even a law (i.e. policy documents), they can be considered part of policy implementation, and we analysed them accordingly. However, if such a document was not related to a programme, strategy or plan, it was excluded from our analysis.

The policy is implemented based on the developed and adopted policy documents. Together, they make up the policy cycle - interconnected stages. If any documents are adopted outside this cycle, they may affect this policy, but their analysis, assessment of their relevance, effectiveness, and efficiency is complicated and will require a separate study (with a separate detailed justification of the criteria of relevance, effectiveness, and efficiency). This, in turn, is beyond the scope of our study. The only thing worth noting in this regard is that this method of policy implementation is problematic in itself. Not only does it complicate policy analysis (and thus monitoring and evaluation of policy by stakeholders, including those who adopted these documents), but the adoption of such documents is haphazard, at best a temporary “patchwork”, and therefore almost never achieves the goal and, consequently, fails to solve the policy problem.

5.1. Level of Implementation of Government Programmes and Plans

In general, during the period under review (2014-2021), we identified seven annual Priority Action Plans, four Programmes of Activities and two sectoral strategies among the veteran policy documents. Some of the measures planned in these documents cannot be adequately analysed for the reasons described in detail in Chapter 3. “Policy Development”. Overall, these reasons can be described as the use of flawed policymaking tools that do not allow to track whether certain measures have been implemented. The most common shortcomings of these instruments are:

- ▶ Issues with deadlines: deadlines are either absent or stretched over the entire time period.
- ▶ Imperfect indicators: indicators are either absent or cannot be tracked.
- ▶ Imperfect content of the measures: the wording of the content of a particular measure makes it unclear what exactly the implementer should do, or the purpose of the measure is formulated in such a way that its implementation cannot be tracked (typical wording: facilitating, supporting, coordinating, working on the issue, ensuring cooperation, etc.).

If certain measures of the document being evaluated have such shortcomings, then their implementation was not monitored. Of course, with regard to some measures, the indicators of their implementation are obvious, first of all, the approval of the NLA, and the self-evident indicator here is the actual approval of this NLA. In such cases, the measure was evaluated even without a separate indicator.

Summary of Monitoring Results²²⁵ for the Implementation of Programmes, Plans and Strategies in the Following Areas

Document Name	Description of Implementation Status
Programme of Activities of the Cabinet of Ministers of Ukraine 2014 ²²⁶ (Government of A. Yatseniuk).	Five measures were planned for veteran policy. - Implementation of four measures could not be assessed due to a lack of indicators. - One measure was not completed; it was implemented 3.5 years later by a different government.
Action Plan for Medical, Psychological, Professional Rehabilitation, and Social Adaptation of ATO Participants (2015) ²²⁷	A total of 55 measures were planned. - Execution of 44 measures could not be assessed due to a lack of indicators and/or abstract formulations of the measures. - One measure was not implemented. - Three measures were implemented. - One measure was partially implemented. - Six measures were implemented with delays.
Action Plan for the Implementation of the Cabinet of Minister's Programme of Activities (2015) ²²⁸	Six veteran-related measures were planned (initially eight, but two were removed by the Cabinet of Ministers). - Implementation of five measures could not be assessed due to a lack of indicators and/or abstract formulations. - One measure was not implemented and was completed 3.5 years later by a different government.
Government Priority Action Plan for 2016 ²²⁹	Two veteran-related measures were planned. - Implementation of one measure could not be assessed due to a lack of indicators and/or abstract formulations. - One measure was implemented.
Government Priority Action Plan for 2017 ²³⁰	One veteran-related measure was planned. - The measure was implemented with delays.
Government Priority Action Plan for 2018 ²³¹	Two veteran-related measures were planned. - Implementation of both measures could not be assessed due to abstract indicators.
Government Priority Action Plan for 2019 ²³²	Eight veteran-related measures were planned. - Three measures were not implemented. - Five measures were implemented.

225 If a particular document was amended, the monitoring was carried out considering these changes, not the original version.

226 On the Programme of Activities of the Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine of 11.12.2014 No. 26-VIII.

227 On Approval of the Action Plan for Medical, Psychological, Professional Rehabilitation and Social Adaptation of Participants of the Anti-Terrorist Operation: Order of the Cabinet of Ministers of Ukraine of 31.03.2015 No. 359-r.

228 On Approval of the Action Plan for Implementation of the Programme of Activities of the Cabinet of Ministers of Ukraine and the Sustainable Development Strategy "Ukraine - 2020" in 2015: Order of the Cabinet of Ministers of Ukraine of 4.03.2015 No. 213-r.

229 Government Priority Action Plan for 2016: Order of the Cabinet of Ministers of Ukraine of 27.05.2016 No. 418-r.

230 Government Priority Action Plan for 2017: Order of the Cabinet of Ministers of Ukraine dated 3.04.2017 No. 275-r.

231 Government Priority Action Plan for 2018: Order of the Cabinet of Ministers of Ukraine of 28.03.2018 No. 244-r.

232 Government Priority Action Plan for 2019: Order of the Cabinet of Ministers of Ukraine of 18.12.2018 No. 1106-r.

5. POLICY IMPLEMENTATION

Action Plan for 2019 and subsequent years aimed at ensuring the development of physical culture and sports rehabilitation of combatants who participated in the anti-terrorist operation, in measures to ensure national security and defence, repelling and deterring the armed aggression of the Russian Federation in Donetsk and Luhansk regions ²³³	Fourteen veteran-related events were planned - Implementation of all 14 measures could not be assessed due to a lack of indicators and/or abstract wording of the measures.
Programme of Activities of the Cabinet of Ministers of Ukraine for 2019 ²³⁴ (Government of O. Honcharuk)	Included two goals and an undefined number of measures. Implementation of goals and measures could not be assessed ²³⁵ due to the absence of performance indicators..
The State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period up to 2022. ²³⁶	A total of 11 tasks were planned. - Two tasks were not implemented. - Seven tasks were partially implemented (these tasks cannot be considered completely unfulfilled, but their performance indicators are minimal). ²³⁷ - Two tasks were fully implemented. (More detailed information on the implementation of this Programme is provided in Chapter 5.2.1).
Government Programme of Activities 2020 ²³⁸ (Government of D. Shmyhal)	A total of 15 veteran-related measures were planned. Their implementation could not be assessed due to a lack of timeframes and/or performance indicators. - One measure was implemented.
Government Priority Action Plan for 2020 ²³⁹	A total of 14 veteran-related measures were planned. - Five measures were not implemented. - Four measures were partially implemented. - Five measures were fully implemented.
Government Priority Action Plan for 2021 ²⁴⁰	A total of 30 measures were planned. - Twelve measures were not implemented. - Seven measures were partially implemented. - Four measures were implemented with delays. - Seven measures were fully implemented.

233 On Approval of the Action Plan for 2019 and Subsequent Years Aimed at Ensuring the Development of Physical and Sports Rehabilitation of Combatants Who Participated in the Anti-Terrorist Operation, in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions: Order of the Cabinet of Ministers of Ukraine of 20.03.2019 No. 168-r.

234 Programme of Activities of the Cabinet of Ministers of Ukraine, 2019.

235 Of course, one can try to evaluate these measures in a meaningful way, but the Honcharuk's government was in place for only six months, and it is obvious that the vast majority of measures, even if they had been well planned and had specific indicators, would not have been implemented simply because of the lack of time.

236 On Approval of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of the Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022: Resolution of the Cabinet of Ministers of Ukraine of 5.12.2018 No. 1021.

237 A task was considered partially completed if even minimal progress was made. For example, if even one of the 5,603 specialist positions for veteran support was filled, the measure was deemed partially implemented. However, the performance indicators for the seven partially completed tasks were minimal. If these measures were evaluated based on whether the target indicator was achieved, all of them would have been classified as unfulfilled.

238 Programme of Activities of the Cabinet of Ministers of Ukraine, June 2020.

239 Government Priority Action Plan for 2020: Order of the Cabinet of Ministers of Ukraine of 9.09.2020 No. 1133-p.

240 Government Priority Action Plan for 2021: Order of the Cabinet of Ministers of Ukraine of 24.03.2021 No. 276-p.

Action Plan for 2021-2025 to implement the National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans ²⁴¹	A total of 20 measures were planned. Of them, two fell within the monitoring period (the rest had deadlines beyond the monitoring period). - One measure was implemented with delays. - One measure was not implemented.
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Monitoring the implementation of veteran policy programmes and plans shows several trends. Once again, we can observe the low quality of policy planning: until 2020, the number of measures that can be assessed for implementation was quite low, both due to the small number of measures on veteran policy and their abstract nature/lack of indicators/delivery dates. However, since 2019, the number of measures on veteran policy that can be assessed has been increasing. Nevertheless, the level of implementation of these measures remains low. About a third of the measures were usually not implemented at all. Depending on the specific plan/programme, from one third to one half of the measures were only partially implemented (according to the criterion “implemented/not implemented”, they can be assessed as “not implemented”). This situation is usually caused by the fact that a certain quantitative indicator of implementation is greater than zero, but less than the level defined in the plan. Most often, this concerns the provision of rehabilitation services, or training, or some activities that should take place in the regional dimension. Some of the completed activities were implemented with violations of the deadlines. Fully implemented measures include 20-30% for the period after 2019. It is also worth noting that often completed measures are those that require only the development of a certain draft law and its registration in the Verkhovna Rada, or are implemented by 90% by other implementers, not the Ministry of Veterans (a striking example is the measures related to the Invictus Games). In other words, such completed activities do not in themselves imply policy improvement (in the case of a draft law being registered), nor do they serve as evidence of the Ministry of Veterans Affairs’ effective work in implementing veteran policy.

Thus, based on the data from monitoring the implementation of the Plans and Programmes, the state of implementation of the veteran policy is rather low.

5.2. Financing and Use of Funds to Implement the Veteran Policy

Insufficient funding for veteran policy is often cited as an argument to explain problems with the implementation of this policy: “...it [the Ministry of Veterans] has insufficient funding for full development: the draft budget of Ukraine for 2021 allocates approximately €11.32 million (UAH 374 million) for the Ministry of Veterans, slightly less than in the 2020 budget”²⁴². This thesis is partially true, as the Ministry of Veterans has the smallest amount of funding compared to other ministries. However, there are several counterarguments that undermine the thesis of insufficient funding. Firstly, the amount of funds allocated directly to the Ministry of Veterans has been increasing year after year²⁴³:

241 On Approval of the Action Plan for 2021-2025 for the Implementation of the National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans: Resolution of the Cabinet of Ministers of Ukraine of 30.06.2021 No. 667.

242 J. Friedrich. The Long Shadow of Donbas. Veteran Reintegration and Strengthening Social Cohesion in Ukraine / T. Friedrich, T. Luetkefend // GPPi.net. 2021. P. 19.

243 In addition, the amount of funds allocated to the Ministry of Veterans increased during the year (compared to the amount originally planned in the State Budget).

- ▶ In 2019, the Ministry of Veterans was financed by UAH 168 million²⁴⁴.
- ▶ In 2020, the Ministry of Veterans was financed by UAH 478 million, and including subventions to local budgets - by UAH 1,121 million (1.1 billion)²⁴⁵.
- ▶ In 2021, the Ministry of Veterans was financed by UAH 528 million, and including subventions to local budgets - by UAH 1,438 million (1.4 billion)^{246, 247}.

This is the amount of funds that the Ministry of Veterans utilized to finance both its operational costs and the implementation of the programmes for which it is the designated implementer. These figures are based on section II.1 “Expenditures by Programme Classification of Expenditures and Crediting of the State Budget” of Chapter II “Expenditures” of the Report on the Execution of the State Budget of Ukraine (column “executed for the reporting period (year)”).

Secondly, the veteran policy was implemented not only through the Ministry of Veterans. Both organisationally and financially, many other actors were involved in the implementation of this policy, with the largest contributors being the Ministry of Defence, the Ministry of Internal Affairs and the Ministry of Social Policy. Moreover, it is often difficult to separate expenditures on veterans from expenditures on other categories of beneficiaries, making precise calculations challenging. Therefore, assessing the cost of veteran policy based solely on Ministry of Veterans’ expenditures is incorrect.

Efficiency of Funds Utilization: A Case Study of the State Target Programme

Funding policy has an essential dimension beyond the mere volume of financing—the efficiency of the use of allocated funds. An insufficient budget, if utilized effectively and productively, provides a compelling argument for increasing funding. Conversely, if existing funds are used inefficiently and fail to deliver the intended results, any arguments for additional funding are countered with the notion that increased funding will only lead to a greater volume of inefficiently spent resources. Understanding how funds are allocated and utilized also helps evaluate the quality of policy implementation, as the vast majority of measures require financial resources. Of course, it is possible to write a decree on psychological rehabilitation or housing provision, which does not require funding (except for the maintenance of the Ministry), but the services of a psychologist or the purchase of an apartment must somehow be paid for.

The best candidate for assessing how the funds were spent (in fact, how the policy was implemented) is *the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022*²⁴⁸. The State Target Rehabilitation Programme can be considered the key and

244 Annual Report on the Implementation of the State Budget of Ukraine for 2018.

245 Annual Report on the Implementation of the State Budget of Ukraine for 2020.

246 Annual Report on the Implementation of the State Budget of Ukraine for 2021.

247 Even though this is the largest amount in three years, compared to the funding of other ministries in 2021, the Ministry of Veterans ranks second to last.

248 On Approval of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of the Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022: Resolution of the Cabinet of Ministers of Ukraine of 5.12.2018 No. 1021.

central strategic document of veteran policy in the period 2014-2021, although it had a difficult history of development and adoption²⁴⁹. This is the only strategic veteran policy document that was directly linked to the budget programme. Other documents, such as Programmes of Activities, Priority Action Plans and *the Strategy for the Development of Physical Culture and Sports Rehabilitation*, were to be implemented at the expense of unspecified state budget expenditures.

When analysing the State Target Programme and assessing the efficiency of fund utilization within its framework, it is essential to consider the 2023 report of the Accounting Chamber²⁵⁰, which is a state policy assessment²⁵¹, carried out by the authorised body with maximum access to documents and information. The reports of the Accounting Chamber hold a unique status and carry significant weight for both legislative and executive authorities.

The implementation of the Rehabilitation Programme accounted for half to two-thirds of the budget of the Ministry of Veterans (in fact, the entire budget consisted of the maintenance of the apparatus, the implementation of the Programme and one-off payments for disability or death). The budget for 2019 allocated UAH 112.7 million for the Programme, UAH 246.7 million for 2020, UAH 255.6 million for 2021, and UAH 276.8 million for 2022.

The Programme had organisational and legal shortcomings. Even at the stage of its development, it contained many gaps, namely, regarding the lack of certain powers of its implementer and the consistency of the Programme's provisions with the norms of the current legislation. These shortcomings and inconsistencies were not resolved until the very end and resulted in the replacement of psychological rehabilitation measures with psychological assistance measures²⁵². The centres for social and psychological rehabilitation of the population, which were planned to be opened under the Programme, also did not provide rehabilitation services, limiting themselves to providing social and psychological assistance (moreover, their number was significantly lower than planned in the Programme). The activities of such centres sometimes did not deal with veteran issues or rehabilitation at all:

249 Back in 2014, the Yatseniuk government planned to adopt a "Programme of Social Rehabilitation and Adaptation of Participants of the Anti-Terrorist Operation" in its Government Programme of Activities. In 2015, an Action Plan for Rehabilitation was adopted, which was fundamentally different in its content from what should have been laid down in the Programme. In 2017, the Concept of the State Target Rehabilitation Programme was approved, which criticised the 2015 Action Plan and considered it necessary to approve and implement a fundamentally new document. The Government's Priority Action Plan for 2018 did not plan to approve the Programme or create the Ministry of Veterans, but this is exactly what happened at the end of 2018. Both the Programme and the Ministry of Veterans were created almost simultaneously (November-December 2018), and in fact, the Programme was, in the absence of other strategic documents (until 2021), the main plan for the development of veteran policy for the Ministry of Veterans.

250 Report of the Accounting Chamber of 06.06.2023 No. 12-5 "On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine".

251 Such attention to the Accounting Chamber's report is also due to the fact that, in addition to being a source of information on the state of implementation of the Programme, this report is also indicative of the monitoring and evaluation of public policy. The information in the following paragraphs is taken from the Accounting Chamber report. This may be a direct quote or a summary of the content of certain parts of the report. Given that this is probably the only systematic document on the state assessment of the implementation of the veteran policy, we tried to make the most of the results of this audit and fit 76 pages of this report into a couple of pages of summary text with some illustrations. Finally, the credibility of the Accounting Chamber's report is due to the wide involvement of stakeholders in the process of its preparation (All-Ukrainian Association of Physical Medicine, Rehabilitation and Balneology, the Department of Psychological Support of the Civil Protection Operational Rescue Service of the SES of Ukraine, the Ministry of Health of Ukraine, etc.), and the reaction of the Ministry of Veterans to this report.

252 Psychological rehabilitation is a broader concept than psychological assistance and involves different content. For example, psychological assistance does not include medication, whereas rehabilitation may. Psychological assistance can be an integral part of rehabilitation, but rehabilitation cannot be limited to psychological assistance alone.

"...the topics of the events did not correspond to the professional orientation of the psychologist's work and their job description" (conversations on the topic "All-Ukrainian Vyshyvanka Day: Remembering our traditions" [...])

During the implementation of the Programme, significant reductions were made to its indicators:

- ▶ Measures related to training educational staff and rehabilitation specialists, as well as the provision of inpatient psychological rehabilitation services²⁵³ for 38,000 veterans, were completely removed.
- ▶ The number of individuals to receive psychological rehabilitation was reduced by 1.7 times (by 14,000 people) and the number for professional readaptation was reduced by 3,000.

Accordingly, **spending on psychological rehabilitation was reduced by 2.7 times - to UAH 232 million. Moreover, of these funds (planned expenditures), "during 2019-2022, UAH 62.5 million was not used (returned to the state budget)".** On the other hand, the number of individuals eligible for sanatorium-resort treatment was increased by 15,000, and funding for this area was increased by 1.8 times (to UAH 624 million). In other words, during the implementation of the Programme, psychological rehabilitation measures were reduced, while the direction of sanatorium treatment, on the contrary, was expanded. This, in turn, "made it impossible to achieve the goal of the State Target Programme to ensure medical, physical rehabilitation and psychosocial readaptation of the affected participants".²⁵⁴

According to the audit report by the Accounting Chamber, based on the analysis of the Ministry of Veterans' reports, "for the period 2019-2022, the indicators planned by the State Target Programme for the number of affected participants provided with psychological assistance, professional readaptation and sanatorium treatment were met by an average of 67.4%".

The Programme had a certain internal coherence and logic, the implementation of some measures could not be carried out without others, while early shortcomings in implementation led to problems with the execution of subsequent measures:

"In 2019-2020, the Ministry of Veterans failed to ensure the implementation of the basic measures envisaged by the State Target Programme, such as analysing legislation and programmes in the field of rehabilitation and readaptation of affected participants, studying international experience in rehabilitation and readaptation of affected participants, as well as programmes of transition from military service to civilian life, forming a psychological profile of the affected participant, conducting an inspection of the activities of institutions and facilities providing rehabilitation and readaptation services. The process of rehabilitation and readaptation was introduced without a sufficient legal basis that would clearly regulate the scope and algorithm of the measures, in the absence of a complete psychological profile of the affected participant as a basis for further actions to restore the lost psychophysiological abilities"

²⁵³ The content of the activities also changed. Instead of psychological rehabilitation, it was planned to provide psychological assistance.

²⁵⁴ By the way, the purpose of the budget programme (CPEL 1501040) has always been rehabilitation, not psychological assistance.

A number of the Programme's measures were simply not implemented. This includes studying international experience, preparing analytical documents, developing a standard template for a plastic card, developing sectorial standards for physical and medical rehabilitation, as well as many other measures.

A particularly painful problem for the implementation of the most critical part of the Programme (rehabilitation itself) was the failure to approve standards: *"...sectoral standards for psychosocial rehabilitation of affected participants [...], sectoral standards for physical and medical rehabilitation in line with international requirements, professional standards for doctors of physical and rehabilitation medicine and psychotherapists, physical therapists and occupational therapists were neither developed nor implemented"*.

The absence of standards has left state, municipal, and non-governmental (both public and commercial) service providers uncertain about how rehabilitation should be carried out or what they should be guided by. Similarly, service commissioners are unsure about the criteria for selecting providers. As a result, the services provided to the end users – veterans – are of very undefined quality and usefulness, and the typical institutions offering psychological rehabilitation services have become sanatoriums. The audit provides an example of veterans' complaints about the content of such services: *"psychological rehabilitation services [...] included only accommodation, meals and certain procedures (physical therapy, herbal tea, mineral water)"*. A more candid assessment was gathered during expert interviews:

"I saw it myself in Truskavets, and it's... just a typical 'drinker's retreat'. You get a referral, you go there, you can't take your family with you. You meet about 40 people there, and first you drink beer, then Naftusia [a type of mineral water]. [...] Is it about recovery? I seriously doubt it"

Moreover, according to the audit, quality services could not be provided, because *"the cost of 1 person-hour of psychological services was 1.2-2.6 times less than the minimum hourly wage for unskilled labour"*.

Another deficiency identified by the audit was the misuse of funds, which meant that *"municipal non-profit enterprises (medical institutions) that provide healthcare services and are not VAT payers"* received VAT refunds. The total amount of uneconomically spent funds allocated for VAT refunds is UAH 2.9 million.

In general, the Programme had a low performance: *"...even the Ministry of Veterans assessed the implementation of the tasks and measures of the State Target Programme at 45.6 per cent [...], confirming the conclusion that the implementation of the State Target Programme was extremely low"*.

A significant part of the budget funds was simply not utilised: *"...the implementation of the tasks and measures of the State Target Programme in terms of funding was ensured by an average of only 41.1%, of which 78.4% was provided by the state budget"*.

One of the main achievements of the Programme was the creation of the Unified Register of Combatants. The development of the register was funded by the IBRD and overseen by international organisations. The implementation of a successful project in the field of veteran policy under the patronage of NGOs, against the backdrop of less modest successes of government initiatives, is another example (another such example is veteran sports, in particular the Invictus Games²⁵⁵) of the low capacity of

²⁵⁵ We have already described this problem in Chapter 4. "Policy Adoption".

government agencies responsible for developing and implementing veteran policy (in particular, the Ministry of Veterans as the responsible body for implementing the Programme).

Moreover, *“In fulfilling the task of ensuring effective information, which included [...] conducting information campaigns, creating and publishing printed materials, creating and broadcasting programmes about the problems and success stories of affected participants, etc., the Ministry of Veterans actually appropriated the results of the activities of local executive authorities and local self-government bodies, posted on official websites under the headings “To the Defenders of Ukraine”, “Social Protection of ATO Participants”, “Social Services” [...], numerous thematic headings in the media at the regional and district levels (“Trending topics...”, “Straight Talk”, “Social Protection”, “Social Service in Action”, “Legal Advice”, “On Adaptation of ATO Participants”)”.*

In addition, the Ministry of Veterans’ reports (and, accordingly, the successfully implemented measures of veteran policy) largely consisted of the activities of international projects: *“Despite the failure to fulfil the vast majority of tasks and measures envisaged by the State Target Programme, the Ministry of Veterans paid special attention in its reports on its implementation to the results of a number of joint international projects in this area.”*

The regional dimension of the Programme’s implementation also had shortcomings, which created *“disproportions related to the unused funds remaining in some regions and insufficient funding in others”*. The regional centres established for rehabilitation faced significant operational challenges: *“...an outdated and inefficient system of statistical and operational accounting, unsystematic activities, an imperfect methodological framework, as well as low qualification of practical psychologists, making it impossible to provide affected participants with high quality psychological services given the specificity of their problems”*.

Reports from the Ministry of Veterans on the implementation of the Programme contained numerous violations: *“...the inclusion of inaccurate data in the budget request”; “the indicators of actual implementation of the specified targets are also inconsistent with each other”; “the inconsistency of the reporting indicators of the Ministry of Veterans with the indicators approved in the State Target Programme, the State Budget of Ukraine, the passport of the relevant budget programme and the actual indicators of implementation of certain measures”*.

Reports of the Ministry of Veterans also failed to align with those of lower-level spending units from the regions. The deficiencies in both the Programme implementation and reporting processes were not identified due to the inadequate organisation of internal control and audit processes. **Another reason for the systemic problems with the implementation of the Programme is the constant personnel and organisational changes - ministers, the structure of ministries and their subdivisions, deputies and heads of directorates.**

The general conclusion of the Accounting Chamber is that *“the Ministry of Veterans [...] failed to ensure effective management and utilisation of state budget funds”*, the Programme’s objectives were not achieved, the regulatory framework for the Programme was flawed and contradictory, and there were numerous violations of budget legislation and cases of inefficient and ineffective use of budget funds.

5.3. Problems of Policy Implementation

Very few initiatives to improve veteran policy have reached the stage of policy implementation. However, even at this stage, veteran policy faced problems. These problems were manifested in the low level of implementation of veteran policy plans and numerous shortcomings pointed out by the

Accounting Chamber. In fact, the problem lies in the low quality of policy implementation, which is caused by the low capacity of the main coordinating body of veteran policy - the Ministry of Veterans. While the low capacity of the Ministry of Veterans (*“the Ministry of Veterans is neither institutionally nor professionally capable”*) was, in turn, caused by the retention of the old staff of the State Service, shortcomings of the political leadership of the Ministry, and problems of previous policy stages. The problem of low capacity was also exacerbated by the dispersion of powers.

Retention of the old personnel core of the State Service. One of the reasons for the creation of the Ministry of Veterans was the low capacity of the State Service of Ukraine for War Veterans and Participants of the Anti-Terrorist Operation. The small number of employees and lack of powers were the normative side of this problem. The other side of the problem was informal practices: internal motivation of employees, rules, customs, traditions, relationships, and the general working atmosphere. When the Ministry of Veterans was created, it was planned to change both the formal and informal aspects of the work of the body that was supposed to develop and implement veteran policy. Although the formal side was partially changed, the informal side underwent much fewer changes. This happened because the Ministry was created based on the State Service. In fact, it was a reorganisation, not the liquidation of the old body and the creation of a new one:

“This is a fairly protected body with unmotivated employees, from whom this ministry was created. One of the main points that was insisted upon at the time was that the Ministry should be created from scratch and form its own team that would be motivated to work there, but they decided to take the path of least resistance and transfer employees of the former State Service on Veterans to the Ministry”

That is, the informal rules of the State Service were transferred to the Ministry:

“Those who worked in the State Service on Veterans [...] automatically moved to the Ministry, but they were all quite inert”

Accordingly, the negative features of such informal rules were reproduced in the Ministry of Veterans. This, in turn, had a negative impact on the institutional capacity of the Ministry.

It should also be added that the Ministry of Veterans was subject to the typical staffing problems of other state authorities:

“It is a huge problem to find specialists for such a salary (UAH 13,000)”

Part of the reason for these problems was the low capacity of the State Service, and later the same situation occurred in the Ministry of Veterans.

Shortcomings in political leadership. The Ministry of Veterans was headed by four ministers until 2022. The problem was caused by both the speed of the leadership change and the limitations in the work of individual ministers. During the first two years of the Ministry's work, four ministers were replaced, and they had very limited time to form their own team, establish work processes within the Ministry, build communication with other stakeholders, etc. Therefore, even if the external circumstances were ideal, the development and implementation of systemic changes is an extremely difficult task in such circumstances.

Changes in ministers were also accompanied by staffing changes within the Ministry: “between 2019 and 2022, the name of the specialised directorate responsible for the development and implementation of state policy in the area of social protection of war veterans and members of their families changed five times, and its head changed three times”²⁵⁶. This indicates that shifts in political leadership also resulted in turnover among direct implementers within structural divisions. Thus, there was a situation where one part of the Ministry of Veterans consisted of unchanged former employees of the State Service, while the other part, with newer staff, experienced rapid turnover. It was the leadership positions - state secretaries and heads of divisions, responsible for shaping and coordinating workflows at the Ministry – that underwent these frequent changes. This turnover required repeated efforts to establish workflows and build communication within the Ministry, etc. Moreover, this often means losing the previous team’s progress:

“...everything developed by the predecessors was immediately considered wrong and needed to be urgently redone. That is, no matter how much [the team of the previous minister] tried, for example, to bring all the developments on health, housing, and other issues, [the team of the current minister] would express thanks, file them away, and start from scratch”

The functioning of the Ministry of Veterans has had various problems, obstacles and shortcomings during the time the Ministry was run by different ministers.

The first Minister, **Iryna Friz**, held her post from November 2018 to August 2019. The first part of her term was when it was necessary to develop the regulatory framework for the Ministry of Veterans and organise all other aspects of its work almost from scratch. The second part was during the “transitional period”, when V. Zelenskyy was already President, while V. Groysman was still prime minister, and parliamentary elections were taking place (I. Friz was a candidate of the “European Solidarity” party).

The second Minister, Oksana Koliada, was appointed in August 2019 and dismissed (along with O. Honcharuk’s government) in March 2020, having worked in this position for the shortest time of all the ministers of veterans’ affairs. In fact, O. Koliada was the head of the unified Ministry for Veterans, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine. The merger of the two ministries means repeating all the regulatory and organisational processes required to create a new ministry:

“...to launch the Ministry, including the one merged with reintegration, it is necessary to rewrite the entire regulatory framework for this Ministry. This is enormous, starting with the regulation that needs to be approved at a Cabinet meeting and ending with changes to all programmes, where the new Ministry of Veterans Affairs and Reintegration should now be. The team of the new minister had to do this instead of doing real work, changing the current legislation, carrying out quality reforms, shaping a veteran policy. [...] reintegration is a completely different set of issues if dealt with systematically. Then, again, disbanding, transferring [...] give or take, if it needs to be done through a Cabinet of Ministers meeting that takes place once a week, it takes a good 2-3, sometimes 4 months. This is a loss of programmes that, in principle, should be

²⁵⁶ Report of the Accounting Chamber of 06.06.2023 No. 12-5 “On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine”.

administered by the Ministry of Veterans Affairs. [...] Therefore this inhibition was imposed, and the teams of the new ministers were simply forced to spend a lot of time on this nonsense”

All this work was essentially in vain, because in March, along with the resignation of Oksana Koliada (the entire Cabinet of Ministers of Oleksandr Honcharuk resigned), the Ministry of Veterans and the Ministry of Reintegration were separated.

The third Minister for Veterans Affairs was **Serhii Bessarab**. From the outset, he had to deal with similar challenges - to re-establish the regulatory and organisational and staffing support of the Ministry. However, the problem was not as critical, as the regulatory framework had been developed during the previous iteration of the Ministry's launch. On the other hand, the most difficult period of adaptation to the coronavirus epidemic occurred during the administration of S. Bessarab.

The functioning of the Ministry under S. Bessarab received mixed reviews. Even at the stage of appointment, he was reminded of the controversial decisions made during the ATO to restrict the use of weapons for the Ukrainian military: these decisions were criticised by representatives of the public sector (A. Rymaruk, V. Dainega, R. Donik)²⁵⁷. According to the “Slovo i Dilo” portal, S. Bessarab fulfilled 4 out of 11 promises²⁵⁸ (although the Accounting Chamber report allows to adjust this number to 2 out of 11). In December 2020, S. Bessarab resigned, citing his health as the reason²⁵⁹. During the consideration of his resignation, his interaction with the parliament was criticised: “we vote for someone without seeing this minister [...] we have never seen the minister at a committee meeting”²⁶⁰. While the experts interviewed for the study spoke about the shortcomings of S. Bessarab's interaction with the public:

“...when Minister Besarab was in office, he completely lost this tool [the instrument of public control – the Council of Veterans and the Public Council under the Ministry of Veterans]. They thought they had to make decisions on their own, develop decisions and simply report on the adoption of certain policies”

The fourth Minister for Veterans Affairs was **Yuliia Laputina**. As of spring 2025, she is the only Minister for Veterans Affairs who has managed to stay in office for more than one year; in fact, her three-year term is one and a half times longer than the total time spent in office by the previous three ministers combined. That is, Yuliia Laputina is the only one who had the opportunity to develop, lobby for and implement changes to the veteran policy. At the same time, a year after her appointment, a full-scale Russian invasion began, which, of course, affected the government's ability and capacity to develop and implement policy.

The subsequent period is beyond the scope of our monitoring, so we will consider it in a rather limited way. The full-scale invasion did indeed limit the capacity of the legislative and executive authorities, but it also played another role in the context of veteran policy. The issue of veteran policy has become more relevant, and top officials have begun to prioritise it. It became possible to bypass many

257 The Ministry of Veterans is headed by an “old-school general” Serhii Bessarab // Novynarnia.

258 Bessarab resigned as a Minister without fulfilling a third of his promises // Slovo i Dilo.

259 Transcript of the plenary session No. 22 of 16.12.2020 // Verkhovna Rada of Ukraine. 2020.

260 Transcript of the plenary session No. 22 of 16.12.2020 // Verkhovna Rada of Ukraine. 2020.

problems at other stages of the policy cycle²⁶¹. In the second half of 2023, many sources criticised Yuliia Laputina for her performance as Minister between December 2020 and the end of 2023 (part of this period is beyond the scope of this study, but the assessment of the Minister's performance also applies to the period covered by this study). According to the "Slovo i Dilo" portal, Yuliia Laputina fulfilled 4 out of 19 promises²⁶² (although the Accounting Chamber report allows us to adjust this number to 2 out of 19). Since the end of 2021, the Public Council of the Ministry of Veterans began to criticise Yuliia Laputina, accusing her of lack of communication, lack of reporting on her activities, and work failures²⁶³. In December 2023, Yuliia Laputina reported on her work, and based on the results of her report, the relevant Committee on Social Policy and Protection of Veterans' Rights called for the Minister's resignation²⁶⁴. The Public Council at the Ministry of Veterans also called for Laputina's resignation²⁶⁵, as well as the Movement of Veterans of Ukraine²⁶⁶. *Laputina's criticism concerned the low capacity of the Ministry of Veterans and, as a result, the unsatisfactory results of its work: "The personnel policy of the Ministry is of concern, in particular, the lack of skills in rule-making and drafting legislation in the Ministry, a large number of vacant positions in the Ministry [...] as of 24 November 2023, out of 267 positions, 124 positions were vacant"*²⁶⁷, which leads to the low quality of both CMU resolutions and draft laws"²⁶⁸. Poor communication, inefficient use of budgetary funds, general inefficiency and lack of communication and response to these problems were also criticised.

Chronic staff shortages. Throughout its history, the Ministry of Veterans has had chronic issues with staffing capacity. These issues went beyond the standard non-filling of some staff positions to obtain higher financial remuneration for existing employees. The Ministry of Veterans, like other ministries, underwent organisational and functional transformations in 2019-2022.

Since the Ministry of Veterans became operational in June 2019, changes to the structure of its staff have been made 9 times (2 times a year).^{269, 270} Initially, these changes were related to the decision to merge the Ministry of Temporarily Occupied Territories and IDPs with the Ministry of Veterans and the cancellation of this decision by the next government, as well as the creation of directorates. Subsequent changes, starting in 2020, provided for the gradual elimination of directorates and, accordingly, the reduction of reform specialists' positions.

Despite the simplification of competitive procedures for State Service positions (2019-2020), the suspension of competitions during the quarantine period (2020-2021) and appointments to State Service positions without competition during martial law (2022), the Ministry of Veterans failed to overcome the staff shortage associated with the start of work. The average vacancy rate at the Ministry of Vete-

261 This includes those described in the next paragraph.

262 Yuliia Laputina: dossier, promises, rating // Slovo i Dilo.

263 Public Council at the Ministry of Veterans Affairs of Ukraine.

264 The Committee States: The Ministry of Veterans did not assume a leadership and coordinating role within the Cabinet of Ministers of Ukraine in the implementing of the state's veteran policy.

265 Public Council at the Ministry of Veterans Affairs of Ukraine.

266 Movement of Veterans of Ukraine. Facebook.

267 This means that the number of employees of the Ministry of Veterans is approximately equal to the number of employees of the State Service.

268 The Committee states: The Ministry of Veterans has not taken a leadership and coordinating role in the Cabinet of Ministers of Ukraine in the implementation of the state's veteran policy.

269 Source: copies of the structure and staffing of the Ministry of Veterans Affairs sent by letter No. 8665/1.2/3.2-23 of 07.09.2023.

270 This is not the highest number of changes in structure among other ministries (for example, the structures of the Ministry of Education and Science and the central office of the Ministry of Justice changed 23 times during this period, and the Ministry of Reintegration - 21 times).

rans in 2019-2021 was approximately 50% of the staff (with an upward trend), and by the end of 2022, the number of vacancies reached a peak (89.5%).

YEAR	Headcount		Vacancies		Vacancy rate, %		Number of changes to the structure	Number of directorates
	01.01	31.12	01.01	31.12	01.01	31.12		
2019	325	325		142		44	2	0
2020	428	325	142	146	33	45	2	7-5
2021	325	325	146	162	45	50	2	5
2022	325	325	99	291	31	90	2	5-1

Sources: Dashboard “The number of employees of state bodies set by the Cabinet of Ministers (January 2022)”; copies of staffing tables, apparatus structure, information on vacancies provided to ALI at its request.

For example, in other ministries that underwent more significant changes in 2019-2022, the percentage of vacant positions at the end of 2022 was much lower, in particular: MCIP - 4.2%, Ministry of Economy - 8.5%, Ministry of Energy - 19.4%, Ministry of Reintegration - 53.9%.

Problems of the previous policy stages. Shortcomings, primarily in the development and adoption of the policy and to a lesser extent in its agenda setting (in the context of the importance of veteran issues for society), have had a negative impact on the implementation of the policy.

The shortcomings that accompanied **the policy development** are primarily due to the lack of guidelines and frameworks for effective policy implementation. The Government Programmes of Activities and Priority Action Plans mostly lacked performance indicators. None of these documents had financial calculations/justifications and a clear plan for spending budget funds. Consequently, the implementation of these measures was rather arbitrary, which meant that the quality of such implementation was generally low and the impact of policy implementation on achieving its goal was rather weak. The implementation of the policy was also negatively affected by the ill-conceived system of policy implementers laid down at the stage of policy development. Even perfectly executed plans would not have addressed all the issues in the veteran sphere, as at the planning stage these documents did not cover all the problems existing in a particular area of veteran policy, not to mention the absence of strategies in certain areas of veteran policy at all.

The negative aspects of the **policy adoption stage**, namely the absence of a powerful lobbyist, the large role of blocking stakeholders and the negative impact of political struggle, made the policy more difficult to implement. A significant part of the policy implementation measures was of a regulatory nature - the development and adoption of new rules. Accordingly, the difficulties in approving them meant that implementation of certain plans and programmes was also difficult. In addition, the implementation of some measures was tied to the approval of certain NLAs, and their non-approval prevented the implementation of these related measures.

Because veteran policy was not considered a separate and important topic, problems that emerged during the implementation of the policy did not become reasons to amend the policy. This, in turn, led to the fact that the policy was not changed²⁷¹, the accumulated problems were not solved, and the policy continued to be implemented with significant shortcomings.

The problems with the **implementation of the veteran policy** were not only caused by the problems of the previous stages of the policy, but also created such problems for the previous stages. The Accoun-

²⁷¹ If it has, it has been done formally, by adjusting the expected results and objectives so that the measures implemented are better suited to the expected results, while proper policy change should be the opposite - changing the content of measures if the existing measures do not achieve the expected results.

ting Chamber's report demonstrated systemic problems in the Ministry of Veteran's implementation of the Programme. Given that the Ministry failed to ensure effective management, efficient and effective use of funds and reduced the amount of funds for psychological rehabilitation, the thesis that the amount of funds to be allocated to veteran policy should be increased and that the amount of funding for veteran policy is insufficient is unfounded. In the summer of 2023, the Accounting Chamber's report systematically and publicly highlighted the problems with the implementation of veteran policy. However, some episodes of inefficient, ineffective, and wasteful use of funds were known to veteran policy stakeholders before:

"...there were sufficient resources to demonstrate their capability to use these resources constructively, to show their potential and secure more resources for more ambitious plans, however since no ambitious plans were declared, the ability to effectively utilise the available resources was not confirmed"

This partly explains the reluctance of the legislative process to radically increase spending on veteran policy, which can be summed up by the following rhetorical question: "Why increase the amount of inefficiently used funds?"

The fragmentation of powers in the implementation of veteran policy has significantly complicated its execution. This fragmentation involves "22 central executive authorities, guided in their activities by 156 regulatory legal acts"²⁷². In addition to the Ministry of Veterans, the policy is implemented by two dozen other CEBs. The situation was roughly the same for the State Service. From a functional and authority perspective, the establishment of the Ministry of Veterans looked like this: the basis of the Ministry's powers was the powers of the State Service and some powers of the Ministry of Social Policy (respectively, these powers were taken away from the Ministry of Social Policy)²⁷³. The Regulations on the Ministry of Veterans were amended twice (over the period under review), and both changes were related to the merger and then separation of the Ministry of Veterans and the Ministry of Reintegration. No changes were made to the Regulations²⁷⁴ of other ministries, and their powers were not transferred to the Ministry of Veterans. In other words, no attempt was made to concentrate the powers of two dozen central CEBs into one coordinating body responsible for veteran policy. This means that **effective implementation of the veteran policy requires the coordinating body to take a proactive stance and possess the capacity to interact effectively with other bodies.**

The low institutional capacity of the Ministry of Veterans was difficult to reconcile with the model of effective policy implementation by many CEBs. The Ministry of Veterans had problems even in communicating with the institutions under its direct supervision: "There has been no intra-departmental interaction between the Centres [for Social and Psychological Rehabilitation of the Population] and the Ministry of Veterans as a governing body over the past four years"²⁷⁵. The Ministry of Veterans also had a low capacity as a political lobbyist and had problems with internal governmental approval of its draft laws, which required them to be registered through MPs. This suggests that the Ministry

272 On the Preliminary Report of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the Legal Status of War Veterans for the Six Months of Activity: Resolution of the Verkhovna Rada of Ukraine of 03.06.2020 No. 659-IX.

273 Certain Issues of the Ministry of Veterans Affairs: Resolution of the Cabinet of Ministers of Ukraine of 27.12.2018 No. 1175.

274 In the annex to this study, we have compared the Regulations on the State Service of Ukraine for War Veterans and Participants of the Anti-Terrorist Operation and three versions of the Regulations on the Ministry of Veterans Affairs of Ukraine.

275 Report of the Accounting Chamber of 06.06.2023 No. 12-5 "On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine".

of Veterans had difficulties in communicating and coordinating the implementation of veteran policy with other CEBs:

“...a lot depends on other central executive authorities, the Ministry of Social Policy, the Ministry of Health, the Ministry of Economy, but [the Ministry of Veterans] has not become a focal point that will bring other ministries together”

Thus, the **policy implementation system, which involved many CEBs²⁷⁶, combined with the low institutional capacity of the Ministry of Veterans, complicated the already difficult task** of implementing the veteran policy.

Looking at the problem of veteran policy coordination from a different perspective, the Ministry of Veterans lacked the capacity not only to coordinate the work of other CEBs, but also to implement the policy itself:

“Since the departments have 5-6 people on staff, it was physically impossible for this number of people to process all the documents, contracts, acts and everything declared by the 1993 Law. That is, it was physically impossible”

If a decision were made to transfer some of the powers from other CEBs, the Ministry of Veterans would need to be significantly strengthened. In other words, the Ministry of Veterans was not effective enough in its role as a coordinator of veteran policy, but it was not ready to implement it on its own, without involving other CEBs.

Out of hundreds of initiatives to [re]form veteran policy, only a few reached the stage of policy implementation. At this stage, they also faced a large number of problems that prevented them from delivering improved veteran policy to the ultimate beneficiaries - veterans.

²⁷⁶ It is important to note that we do not evaluate the policy implementation system based solely on the large number of CEBs as such (neither criticising nor endorsing it). Instead, the shortcomings and issues arise from the combination of this system with the operational deficiencies of the Ministry of Veterans.

6. Policy Monitoring and Evaluation

The policy evaluation and monitoring stage typically involves assessing the outcomes of policies that were previously included in the agenda, developed, adopted and implemented²⁷⁷. “Policy evaluation” is usually understood as the study of the achievement of the policy goal (results), i.e. the impact of the policy on beneficiaries (veterans). A quality policy evaluation should be regular and based on clear, continuously measurable indicators. At the same time, the evaluation can be arbitrary and irregular, which significantly reduces the quality and systematic nature of the information obtained. Policy monitoring refers to the studying (or controlling) the degree of implementation of measures - the extent to which all planned actions have been carried out. Monitoring is regular and typically guided by well-defined indicators. The Parliament, the President and the Cabinet of Ministers each have distinct tools for evaluating and monitoring veteran policy.

The importance of the monitoring and evaluation stage lies in determining the ultimate effectiveness of the policy and its usefulness for end beneficiaries—veterans: Have the developed, adopted, and implemented policy measures helped address veteran problems in any meaningful way? In the process of monitoring and evaluation, an evidence base should be created to assess the effectiveness and efficiency of the policy.

6.1. Government Monitoring and Evaluation

The peculiarities and shortcomings of the process of monitoring and evaluation of veteran policy are derived from the logic of structuring policy planning documents and their interconnectedness.

Government Programmes of Activities, annual Priority Action Plans and some policy documents by sector (in particular, the Strategy for Physical Culture and Sports Rehabilitation) are hardly linked to budget programmes. This means that there is an almost declarative system of policy planning that is not backed by financial resources, on the one hand, and budget planning that is essentially financing aimless activities. Although the budget programmes formally mention policy objectives derived from the Programmes of Activities and Priority Action Plans, in reality, as we noted in Chapter 3. “Policy Development”, the indicators are often not correlated with each other, and the implementation of these indicators does not contribute to the achievement of the programmes’ objectives and policy goals.

Detailed policy evaluation and monitoring is carried out at the governmental level, since it is the government that implements policy and produces the most important policy planning documents. The key instrument of governmental monitoring (and at the same time internal control) is the mechanism for collecting information on the status of implementation of certain programmes/activities by the direct implementer (ministry, central executive body, RSA and subordinate enterprises) and submitting this information to the Ministry of Veterans. The policy documents themselves specify who should collect information on the implementation of planned measures and when. As noted in Chapter 3. “Policy Development”, the planning documents for veteran policy are:

²⁷⁷ This Chapter, in addition to describing and analysing the process and form of monitoring and evaluation, contains more information on the content of the activities of key actors compared to the previous parts. In our opinion, it is important to demonstrate how the authorities themselves have assessed the results of their previous work.

- ▶ Government Programme of Activities (general government strategic level).
- ▶ Annual Priority Action Plans (government-wide “action plans” for the implementation of the Government Programme of Activities).
- ▶ National Strategy for Physical Culture and Sports Rehabilitation, Target Programme for Rehabilitation and Readaptation (planning by areas).
- ▶ Budget programmes No. 1501010, No. 1501030, and No. 1501040.

The most detailed monitoring is carried out in relation to **the Government Programme of Activities, Priority Action Plans** and individual instructions of senior officials. The Government Programme of Activities and Priority Action Plans are broken down into more specific steps, which are entered into an electronic system that contains data on the specific implementer, as well as the timing and content of the tasks. Progress in the implementation of the Programme, the Plan and individual orders is reviewed weekly at working meetings in ministries. Thus, the government has up-to-date weekly data on the status of implementation of the components of the Programme of Activities, the Priority Action Plan, and individual orders.

The government’s public reporting on the implementation of the Programme and annual Plans (i.e. the information received by MPs), despite the existence of a well-established tracking system within the government, is somewhat inconsistent and lacks standardisation: there are annual reports of 400+ pages, which at least visually reflect the structure of the Programme and Plan for the respective year²⁷⁸, and there are 27-page reports that provide individual quantitative indicators and key achievements of the government²⁷⁹. However, even the most comprehensive reports reflect only what the Ministry has done for the year and do not reflect the unfulfilled part of the annual plan. For example, the 2020 report²⁸⁰ does not contain information on the implementation of clause 419 of the Priority Action Plan for 2020 (*Standardisation of psychological rehabilitation services*) and part of clause 420 (*order of the Ministry of Veterans on approval of a set of preventive, therapeutic and rehabilitation measures aimed at preserving and improving the health of veterans and members of their families*). The Accounting Chamber’s report suggests that the Cabinet of Ministers has up-to-date information on both completed and uncompleted planned measures, but this information is not public²⁸¹.

This practice cannot but influence the situation described above with a very fragmented understanding of the situation in veteran policy among MPs. In fact, the Cabinet of Ministers of Ukraine rarely reports to the Verkhovna Rada of Ukraine on the implementation of the Programme of Activities and Priority Action Plans. There are few cases of the Prime Minister reporting to MPs at a plenary session. A more common practice is for MPs to ask individual questions during an hour of questions to the government. It is worth recalling that the Programme 2020 of the Shmyhal government was not approved by the Verkhovna Rada (i.e. in the constitutionally provided manner), but the Cabinet of Ministers approved it by its own resolution. Accordingly, the Cabinet of Ministers monitors and evaluates and reports on the Programme approved by itself by publishing its reports.

The monitoring of the implementation of **policy planning documents by areas** is carried out in accordance with the procedure stipulated by these documents. For example, *the State Target Pro-*

278 Report on the Progress and Results of the Implementation of the Programme of Activities of the Cabinet of Ministers of Ukraine in 2020.

279 Government Report in 2017.

280 Report on the Progress and Results of the Implementation of the Programme of Activities of the Cabinet of Ministers of Ukraine in 2020.

281 Report of the Accounting Chamber of 06.06.2023 No. 12-5 “On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine”.

gramme stipulated that ministries, CEBs and RSAs should submit information on the status of the Programme's implementation to the Ministry of Veterans every six months²⁸². In addition, budget programme No. 1501040 was tied to the Target Programme, and, accordingly, the monitoring of this budget programme largely reflected the status of the Target Programme.

The National Strategy required the Cabinet of Ministers to provide an annual report on the implementation of the Action Plan for the implementation of this Strategy²⁸³. *The Action Plan for 2021-2025 for the implementation of the National Strategy* specified this procedure, stipulating that ministries, CEBs and RSAs should submit information on the status of the Strategy implementation to the Ministry of Veterans on an annual basis²⁸⁴.

The Accounting Chamber illustrated the state of reporting and monitoring of the implementation of veteran policy programmes by area in its report: ***"The Ministry of Veterans failed to ensure proper control over the use of state budget funds by lower-level spending units. The reporting of social protection bodies on the use of budget funds, which was to be submitted to the Ministry of Veterans on a quarterly basis in accordance with paragraph 9 of Procedure No. 497, was in some cases received in the form of operational information, and not in the form approved by the Order of the Ministry of Veterans No. 51 of 16.08.2019, or was not received at all"***²⁸⁵.

A detailed analysis of the implementation of **budget programmes** will help to identify underlying problems in the system of both monitoring and evaluation and policy planning. It is the budget programmes that can be considered the most elaborate of all the documents - with relatively clear and tangible indicators of the implementation of measures and, most importantly, with the fixation of the resource support for achieving the stated indicators.

Budget programmes are monitored in accordance with the cost, product, efficiency and quality performance indicators set out in the budget programme passport. The monitoring of their implementation should be carried out by *the Budget Programme Monitoring Unit within the Department of Finance, Accounting, Logistics and Procurement of the Ministry of Veterans Affairs of Ukraine*. Annual reports are being prepared based on this monitoring.

The analysis of reports on the implementation of budget programmes revealed the following problems with the policy monitoring and evaluation system.

The programme objective and policy goal do not have independent indicators, unlike the indicators of the implementation of measures (cost, product, efficiency and quality indicators). Only the monitoring of policy implementation was carried out - how many planned activities were carried out and how many more need to be carried out to fully implement the plan. However, there was no evaluation of the achievement of results. In other words, instead of establishing a link between **expenditures and policy results, the link was established between expenditures and the items on which the**

282 On Approval of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of the Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022: Resolution of the Cabinet of Ministers of Ukraine of 5.12.2018 No. 1021.

283 Issues of Development of the National System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans: Decree of the President of Ukraine of 23.08.2020 No. 342/2020.

284 On Approval of the Action Plan for 2021-2025 for the Implementation of the National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans: Resolution of the Cabinet of Ministers of Ukraine of 30.06.2021 No. 667.

285 Report of the Accounting Chamber of 06.06.2023 No. 12-5 "On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine".

funds were spent. Indicators of achievement of the programme's objective policy goal should be the impact on the target audience (beneficiaries) of the policy, i.e. veterans, or society. If it is a rehabilitation programme, it should measure the number or proportion of successfully rehabilitated veterans, not based on the fact of providing the service (for which quality standards have not been approved), but on the impact of the service on veterans. Measuring the number of days spent in sanatoriums does not tell us anything about the improvement of veterans' health. The real indicators of the impact on veterans, depending on the specific programme, could be the level of general well-being, mental well-being, employment rate, divorce rate, discharge rate, alcoholism rate, socialisation rates, etc.

Consequently, both the **objective and the target of the policy are often considered achieved if such claims are made in the report.** Reports constantly state that the objective and target have been achieved, even if some of the expenditures, outputs, efficiency and quality performance indicators are not fully met. A striking example is the "achievement" of the programme objective and policy goal despite an eightfold reduction in funding and a 30-fold reduction in certain indicators for programme No. 1501030 in 2020.

At the same time, sometimes programmes contain indicators that **could serve as metrics for achieving programme objectives and policy goals but fail to perform this role.** This applies, for example, to some quality indicators. Specifically, in the budget programme No. 1501030 for 2020, the quality indicator is "*The share of the population of Ukraine that has a positive attitude towards veterans*" at 50%. However, this was a quality indicator, not an indicator of achievement of the programme objective or policy goal. Even this indicator had shortcomings. Firstly, it was formed without a baseline, meaning that it is unclear what *the proportion of the Ukrainian population with a positive attitude towards veterans* was before the policy was implemented. Accordingly, it is unclear whether the achievement of this level of the indicator is a consequence of the implementation of this budget programme, or whether this level is and has been such in itself. Moreover, a critical examination of the reports on the implementation of budget programmes raises doubts about the actual measurement of this indicator. The report on the implementation of the budget programme confirms that the results of sociological surveys have yielded this indicator. It is doubtful that the level of positive attitude towards veterans was so accurately predicted and turned out to be precisely 50%, no more or less. The report does not specify the sociological surveys used to establish this result. The report on the progress and results of the Cabinet of Ministers of Ukraine's Programme of Activities in 2020 mentions "*a study of youth opinions on the perception of the veteran image and their primary qualities in their opinion*", but it is unclear whether this study was truly "sociological"²⁸⁶, in addition, the opinion of young people does not equal the opinion of the population of Ukraine - an indicator laid down in the programme's passport.

At the same time, **if the indicators of achievement of the goal and objective were simply absent, the planned indicators of the measures²⁸⁷ were often irrelevant and/or did not serve as a benchmark for the Ministry of Veterans.** It was not uncommon for the planned indicators to be changed during the year based on the results of monitoring the implementation of measures.

In 2019, the passports of budget programmes were approved on 26 November, so they were not amended for the next 35 days before the new year, but in 2020, programme No. 1501010 was amended 4 times, programme No. 1501030 - 2 times, and programme No. 1501040 - 3 times. The last change to the targets was made on 30 December (one day before the end of the year). In 2021, programme

²⁸⁶ The documents of the budget programme specify a sociological survey, however conducting a sociological survey requires appropriate financing, which was not included in the veteran-related budget programmes.

²⁸⁷ In programmes, indicators refer to outputs (e.g., the number of services provided, the number of events held, the number of regulations developed, etc.) that are "produced" while implementing budget programmes. In a broad sense, they are measures/tools (but not indicators) for achieving the policy goal.

No. 1501010 was changed 4 times, programmes No. 1501030 and No. 1501040 - one time each. The last change to the targets was made on 21 December (10 days before the end of the year).

The pre-New Year change of plans replaces the logic of policy adjustment: instead of changing approaches to achieve planned results, **the planned results are altered to ensure their formal achievement.**

If the planned indicators were not changed during the year, but there were still problems with their achievement, this could lead to the submission of inaccurate data at the reporting stage.

For example, the passport of the budget programme No. 1501040 for 2020 was amended three times during the relevant year: the product's performance indicators also changed (in particular, the number of people who were to receive psychological rehabilitation decreased by 1022 people (by 15%), and the number of people who were to receive sanatorium treatment decreased by 1224 people (by 14%)). However, under these circumstances, the quality indicators did not decrease: the number of people who received psychological rehabilitation increased by 187.1% compared to 2019 and the number of people who received sanatorium treatment increased by 55.2% compared to 2019. These quality indicators, in turn, were formed by dividing the planned number of people for 2020 by the actual number of people who received the relevant services in 2019, and the actual number of service recipients in 2019 was subtracted from the result of the division, and this how the growth was obtained: 2020 level / 2019 level minus 2019 level. The 2020 report showed that the planned quality indicators were exceeded. Specifically, it reported a 248% increase in psychological rehabilitation and a 136% increase in sanatorium treatment. In reality, the increase was 148% and 36%, respectively; the fact is that the calculation of these quality indicators did not subtract the level of 2019. Thus, instead of the reported overachievement, there was actually underachievement.

The problems described above, **identified during the monitoring and evaluation, directly stem from shortcomings at the planning stage.** During 2019-2021, the Ministry of Veterans was never able to accurately predict the number of people who would obtain the CMB. For example, the deviation of the actual level from the projected level in 2021 was 280% higher than the planned level, despite the fact that the intensity of combat in 2019-2021 was lower than in 2014-2016 and the current stage of the Russian Ukrainian war, which began in 2022. As the intensity of combat increases, the predictive error will only grow.

Finally, when describing issues with indicator development and reporting, it is impossible not to highlight one characteristic feature that is actually indicative of a fundamental flaw in how government bodies operate: **they do not solve problems, but instead perform functions.** Budget programmes, which should be based on a programme-targeted method, were **designed to fund activities** that should have been merely tools for achieving the goal, not an end in itself. A programme should fix certain problems, change the state of play in a certain area for the beneficiaries (the intervention principle), and then end. Instead, the veteran-related budget programmes lacked both means to measure the achievement of such goals and were not structured accordingly. **They contained perpetual indicators that had to be achieved (and were achieved, frequently with overperformance) every year.** Moreover, every year a given programme would declare the fulfilment of its objective and policy goal, while simultaneously asserting the need for its continuation, thereby demonstrating its lack of purpose.

There were **problems** not only with assessing the impact of the policy on veterans, but also with **internal control.** The Accounting Chamber pointed them out quite clearly: *"The reason for most violations identified by the audit and the ineffective, inefficient and uneconomic use of state budget funds under the CPCEL 1501040 in 2019-2022 is the failure of the Ministry of Veterans to ensure effective internal control at all stages of implementation of both the budget and the State Target Programme. During the implementation of the tasks and activities of the State Target Programme, the internal audit unit*

and the Ministry's management have never raised the issue of the effectiveness and legality of the use of state budget funds for the relevant purposes, including the performance of the Centres subordinate to the Ministry of Veterans. The internal control system of the Ministry of Veterans as the main budget holder was flawed due to permanent changes in leadership, structure and responsible implementer of the budget programme. There is no proper control over the use of state budget funds by lower-level spending units²⁸⁸. **The Accounting Chamber also drew attention to numerous cases of inaccurate information and data provided by the Ministry of Veterans in its reports.**

However, of all the problems in this area, the biggest one is the absence of a performance and quality evaluation system, which effectively means a lack of policy evaluation.

Firstly, there is no organisational and staffing foundation for conducting such evaluation. General monitoring of the implementation of budget programmes is carried out by the *Budget Programme Monitoring Unit within the Department of Finance, Accounting, Logistics and Procurement of the Ministry of Veterans Affairs of Ukraine*. Instead, regular assessment of policy implementation, the quality of such implementation, and the impact of their work on veterans should be carried out by dedicated units within the relevant directorates and policy departments. As of 2021, the Ministry of Veterans, in particular, the Directorate of Strategic Planning and European Integration, the Department of Civic Identity, the Department of Social Work, the Department of Transition from Military Service to Civilian Life, and the Department of Digital Development and Transformation, do not have any policy monitoring or evaluation departments²⁸⁹.

Secondly, policy documents do not provide for tools to collect information that could indicate the effectiveness or ineffectiveness of the policy in terms of its impact on veterans and their problems. During 2014-2021, there were no regular surveys or studies of veterans that could be used as indicators in programmes and plans. Therefore, even if there was a desire to use qualitative indicators of policy impact, they were difficult to collect. However, there were no attempts to develop and implement such a system in 2014-2021. It is a positive trend that such regular surveys (both representative and non-representative anonymous online surveys) have begun to be conducted, albeit after the full-scale invasion began^{290, 291}. At the same time, due to the closure of information during martial law, it is not possible to determine whether the collected data is used in government policy planning.

In the 2019–2021 budget programmes, no funds were allocated for monitoring and evaluating the impact of policies on veterans. This indicates that quality control and performance assessment of these programmes were not part of the program developers' plans.

Consequently, **veterans who were dissatisfied with the veteran policy and the implementation of specific programmes had no systematic means to highlight shortcomings or express their dissatisfaction with these policies and programmes, as there was no mechanism for veterans to provide feedback.** This also means that the Ministry of Veterans could not adequately evaluate the effectiveness of its policies and programmes. This gap likely contributed to communication issues between the Ministry of Veterans' representatives and members of the public²⁹².

288 Report of the Accounting Chamber of 06.06.2023 No. 12-5 "On the Results of the Performance Audit of the Use of State Budget Funds Allocated for the Implementation of Measures for the Rehabilitation and Readaptation of Affected Participants of the Revolution of Dignity, the Anti-Terrorist Operation, and Repelling Armed Aggression Against Ukraine".

289 The names of the listed departments correspond to the Structure of the Ministry of Veterans Affairs of Ukraine as of 2021, which is not accessible due to the update of the website of the Ministry of Veterans Affairs of Ukraine. The current structure on the website of the Ministry contains different names of departments, however, the problem described above remains relevant for the reorganised departments.

290 Analytics // Ukrainian Veterans Fund.

291 Survey // Ukrainian Veterans Fund.

292 Public Council at the Ministry of Veterans Affairs of Ukraine. Facebook.

6.2. Presidential Oversight

The presidential oversight (which is also a part of the overall system of monitoring and evaluation) has a rather specific form, due to the lack of such powers directly provided for by the Constitution of Ukraine. To perform this function, the President uses a system of advisory bodies, whose activities are less public and regulated than those of governmental and parliamentary bodies. There is no publicly available information of the Office of the President of Ukraine: up-to-date and accessible details about which structural units are included simply do not exist. Accordingly, there is no information on the activities of these structural units and bodies. This places limitations on the analysis of the presidential component of the policy monitoring and evaluation system.

According to the available information, the Office of the President does not have any structural units dealing with veteran policy^{293, 294}. Instead, during the period under review, the following units were active under the President of Ukraine in 2018-2021. The Presidential Commissioner for Rehabilitation of Combatants^{295, 296} (as of 2021, the Presidential Advisor-Commissioner for Rehabilitation of Combatants²⁹⁷) and the Advisory Council on War Veterans and Families of Fallen (Deceased) Defenders of Ukraine (since 2020)²⁹⁸.

One of the main tasks of the Commissioner is *to monitor the situation with regard to ensuring the right to rehabilitation of combatants*. To achieve this, the Commissioner may request and obtain documents, materials and information from the authorities, visit and address them directly.

A similar situation exists with the Advisory Council. Its role is to conduct *a systematic analysis of the situation with social protection of veterans and study the problematic issues arising in the process of granting the status of combatants*. For this purpose, the Advisory Council may request and receive documents, materials and information from the authorities and initiate public discussions, conferences, round tables, debates and meetings.

Thus, the President has the following tools to monitor and evaluate veteran policy: The Advisory Council for War Veterans, Families of Fallen (Deceased) Defenders of Ukraine and the Presidential Commissioner for Rehabilitation of Combatants. They are tasked with monitoring, analysing and studying the status of certain issues of veteran policy. The tools for performing these tasks are limited to obtaining information, documents, appeals, and discussions. The regulations governing the activities of the Commissioner and the Advisory Council do not contain provisions on the regularity of reporting to the President of information received from monitoring and evaluation of veteran policy. These bodies combine many functions, including monitoring. By their nature, they are primarily aimed at resolving current issues, responding to individual cases, coordinating different bodies, and representing the President. In other words, presidential monitoring and evaluation of veteran policy is similar to parliamentary monitoring and evaluation. It is a rather unsystematic and general policy assessment that can

293 Staffing of the Office of the President of Ukraine for 2019.

294 Staffing of the Office of the President of Ukraine for 2021.

295 On the Presidential Commissioner of Ukraine for the Rehabilitation of Participants of the Anti-Terrorist Operation Who Sustained Injuries, Concussions, Disabilities, or Other Disease During Participation in the Anti-Terrorist Operation: Decree of the President of Ukraine of 1.12.2016 No. 536/2016.

296 On the Presidential Commissioner of Ukraine for Rehabilitation of Combatants: Decree of the President of Ukraine of 22.11.2018 No. 386/2018.

297 On the Appointment of V. Svrydenko as the Presidential Advisor-Commissioner for Rehabilitation of Combatants: Decree of the President of Ukraine of 15.06.2021 No. 246/2021.

298 On the Regulation on the Advisory Council on War Veterans and Families of Fallen (Deceased) Defenders of Ukraine: Decree of the President of Ukraine of 14.07.2020.

help understand the general state of the policy and its general problems, but it is not monitoring and does not provide a constant up-to-date understanding of the implementation of specific programmes and plans. In general, the presidential instruments (the Commissioner and the Advisory Council) are not full-fledged public policy instruments, as they have almost no real powers. Their activities are rather aimed at general political supervision.

6.3. Parliamentary Oversight

Parliamentary oversight is a component of the overall policy monitoring and evaluation system.

Tools of parliamentary oversight include reporting of government officials to parliament, parliamentary inquiries, activities of the TSCs/TICs (temporary special commissions or temporary investigative commissions), and post-legislative supervision over the implementation of laws. There is also informal oversight: members of the “Servant of the People” party and its faction, acting as a coalition, have opportunities for party-based oversight over the government officials they appointed. However, this type of control is hidden from the public, making it uncertain whether such informal oversight was exercised and how effective it might have been. The primary tools of parliamentary oversight are specialised committees and specially created TIC/TSCs. Other oversight instruments, such as MPs’ inquiries, address only certain issues of the executive branch, allowing for the establishment of isolated facts within the oversight area.

The Committee on Social Policy and Protection of Veterans’ Rights during the ninth convocation²⁹⁹ held meetings, working sessions, roundtables, and hearings to ensure the implementation of parliamentary oversight over veteran policy. The results of these measures are presented in the table below.

Period	Parliamentary oversight activities and topics during the ninth convocation
Second ³⁰⁰ session of the ninth convocation	1) Hearings where the issues of medical care for veterans were addressed, including war veterans’ hospitals and prosthetics for veterans. 2) Two working meetings/consultations focused on general veteran issues ³⁰¹ .
Third session of the ninth convocation	1) Field visit to veterans’ rehabilitation centres. 2) Two working meetings of the committee members and representatives of the Ministry of Veterans, where the issues of the electronic registry and the activities of the Ministry of Veterans were addressed ³⁰² .
Fourth session of the ninth convocation	Two roundtables with representatives of the Ministry of Veterans, discussing medical care, unemployment benefits, and granting volunteer status ³⁰³ .

299 During the work of the eighth convocation of the VRU, the Committee on Veterans Affairs, Combatants, Participants of the Anti-Terrorist Operation and People with Disabilities ensured parliamentary control over veterans’ policy. Unfortunately, the website of this Committee is not available (and the Committee on Social Policy of the ninth convocation was formed on the basis of the Committee on Social Policy of the eighth convocation). Therefore, it is difficult to obtain complete information about the parliamentary oversight of the eighth convocation.

300 Перша сесія дев’ятого скликання тривала декілька годин, звісно, комітет не встиг провести ніяких заходів.

301 Звіт про роботу Комітету Верховної Ради України з питань соціальної політики та захисту прав ветеранів за період роботи другої сесії Верховної Ради України дев’ятого скликання.

302 Звіт про роботу Комітету Верховної Ради України з питань соціальної політики та захисту прав ветеранів за період роботи третьої сесії Верховної Ради України дев’ятого скликання.

303 Звіт про роботу Комітету Верховної Ради України з питань соціальної політики та захисту прав ветеранів за період роботи четвертої сесії Верховної Ради України дев’ятого скликання.

Fifth session of the ninth convocation	1) Roundtable on supporting families of fallen veterans. 2) Two regional roundtables addressing regional veteran programmes and respect for veterans. 3) Working meeting on providing veterans with benefits (free travel, utilities, housing) ³⁰⁴ .
Sixth ³⁰⁵ session of the ninth convocation	1) Hearings on granting CMB status to certain categories of persons and taking into account the decisions of the Constitutional Court, in particular regarding veterans. 2) Three roundtables on the fulfilment of the state's obligations for social protection, development and implementation of innovations in social security, and social guarantees for medical personnel ³⁰⁶ .

A special activity of parliamentary oversight was the establishment and operation of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the Legal Status of War Veterans. It was established in October 2019³⁰⁷ to improve veteran legislation. The result of the six-month activity of this TSC was a report on its activities, presented on 03 June 2020³⁰⁸. The report identified several key issues:

- ▶ Veterans of various conflicts receive status and state guarantees without consideration of differences in their needs and age.
- ▶ Due to a lack of funds and inadequate infrastructure to provide the declared social guarantees, both war veterans and society in general believe that the state is not doing enough for veterans.
- ▶ The issue of recognition of volunteers and foreign nationals who participate in the defence of Ukraine, as well as their access to benefits and payments.
- ▶ There is no integrated registry of war veterans in Ukraine and the exact number of individuals with war veteran status eligible for state support remains unknown. Various registries are not interconnected, so the number of war veterans in Ukraine is calculated manually.
- ▶ The system of social protection for war veterans and former military personnel requires comprehensive reform.
- ▶ A range of problems related to war veterans' hospitals.

In fact, the primary result of the TSC's work was the report on its work and a resolution *to prevent the shutdown of war veterans' hospitals during the implementation of the second stage of the healthcare reform*³⁰⁹. At the same time, the TSC's report had no influence on policy documents (programmes, plans, strategies), becoming yet another general report on the state of play.

The Accounting Chamber is a crucial component of the parliamentary oversight, entrusted with policy monitoring: *"The Accounting Chamber shall, on behalf of the Verkhovna Rada of Ukraine, exercise*

304 Звіт про роботу Комітету Верховної Ради України з питань соціальної політики та захисту прав ветеранів за період роботи п'ятої сесії Верховної Ради України дев'ятого скликання.

305 Information on the seventh and subsequent sessions of the VRU is not provided, as this period is beyond the scope of the study.

306 Report on the work of the Verkhovna Rada of Ukraine Committee on Social Policy and Protection of Veterans' Rights during the sixth session of the Verkhovna Rada of Ukraine of the ninth convocation.

307 On the Establishment of the Temporary Special Commission of the Verkhovna Rada of Ukraine on Legal Protection of War Veterans: Resolution of the Verkhovna Rada of 19.05.2020.

308 On the Preliminary Report of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the Legal Status of War Veterans for the Six Months of Activity: Resolution of the Verkhovna Rada of Ukraine of 03.06.2020 No. 659-IX.

309 On Preventing the Suspension of Operations of War Veterans' Hospitals During the Implementation of the Second Stage of Healthcare Reform: Resolution of the Verkhovna Rada of Ukraine of 16.06.2020 No. 706-IX.

control over the revenue to the State Budget of Ukraine and the use thereof” (Part 1, Article 98 of the Constitution of Ukraine)³¹⁰. The Accounting Chamber did exercise such control, but not during the period under review. Its report on veteran policy was prepared and published in 2023.

Parliamentary oversight, which allows for parliamentary monitoring and evaluation of veteran policy, has some shortcomings. These shortcomings relate to the general oversight function of the parliament, but also impact the monitoring and evaluation of veteran policy. Parliamentary oversight is carried out on an ad hoc basis, focusing on specific issues and topics that shift from session to session, as evidenced by the oversight activities of the relevant committee and the materials of the TSC. However, they collectively cover most of the veteran policy issues³¹¹.

Some measures that could have addressed the problems of unsystematic control have not been implemented. For example, the 2016 Report and Roadmap on Internal Reform and Institutional Capacity Building of the Verkhovna Rada of Ukraine³¹² suggested introducing a unified *format and structure of annual reports of ministries on the results of implementation of the relevant policy documents* (Recommendation No. 14).

Another recommendation of the Roadmap is to introduce annual committee *work plans for oversight (control) over the executive branch of power* (Recommendation No. 16). The work plans of the Committee on Social Policy and Protection of Veterans’ Rights³¹³ contain, among other things, information on certain control measures (hearings, roundtables, meetings, conferences). However, these plans do not contain information about the representatives of the executive branch of power whom the committee members want to see at a particular event, so it is unclear to what extent the executive branch of power is informed about it (i.e., whether the oversight function that the committee plans are supposed to fulfil is being carried out).

The parliamentary system of oversight of the veteran policy is difficult to assess as either positive or negative. **MPs were generally informed and aware of the general shortcomings of the veteran policy and its main problems, and there was a general consensus that the veteran policy was not working properly and needed to be changed.** This is evidenced by numerous legislative initiatives aimed at solving specific problems of the veteran policy. In other words, at the level of overall policy assessment, the parliamentary system of policy monitoring and evaluation fulfilled its task. However, judging, for example, from the transcript of the committee meeting where the Accounting Chamber’s report was presented³¹⁴, **MPs lacked information regarding policy monitoring: they were unaware of the extent to which state programmes and plans were being implemented, how budgetary funds were being spent, how the Ministry of Veterans was directly implementing policy, etc. In addition, the overall policy assessment relied upon by MPs was far less substantiated and verifiable, as it was not based on regular policy impact studies using clear indicators.**

310 Constitution of Ukraine (official text).

311 The Verkhovna Rada, realising the gaps in the implementation of the parliament’s oversight function, took steps to strengthen it, however only after 2022. It was only in 2023, with the adoption of the Law on Legislative Drafting Activities, that the process of legal monitoring was regulated, which by its very nature allows for post-legislative oversight. In the context of veteran policy, the prospect of using post-legislative oversight has a rather limited potential. No systemic legislative changes were adopted during the period under review, and the consensus on the need to amend the 1993 law existed even without post-legislative oversight (although such oversight could have helped to better identify shortcomings in the implementation of this law).

312 Report and Roadmap on Internal Reform and Institutional Capacity Building of the Verkhovna Rada of Ukraine // European Parliament.

313 Work plan of the Verkhovna Rada Committee on Social Policy and Protection of Veterans’ Rights.

314 Transcript of the meeting of the Committee on Social Policy and Protection of Veterans’ Rights of 19 September 2023.

6.4. Monitoring and Evaluation Challenges

Almost all the **problems of monitoring and evaluation of veteran policy are not specific to veteran affairs**. The problems described, whether in the context of the Verkhovna Rada, the President, or the Cabinet of Ministers, are typical of most policies (and not unique to veteran-related initiatives). These issues reflect shortcomings of the general system of public administration, which are often rooted in deficiencies at other stages of the policymaking cycle, therefore these problems have also manifested in veteran policy.

The policy planning system has led to a **disconnect across various dimensions of evaluation and monitoring of veteran policy**. Both the President and the Verkhovna Rada have engaged only in general assessments of veteran policy - irregular and relatively arbitrary examinations of existing issues within this policy area. This assessment gave a generally correct but unspecific result - an understanding that the veteran policy needs to be changed, without knowing which policy instruments need to be changed and how. This knowledge should have come from monitoring and regular, indicator-based policy evaluation.

On the other hand, the Cabinet of Ministers has developed tools for monitoring the implementation of measures and specific steps that the government plans to take. However, tracking these specific steps has largely replaced the assessment of the policy's impact on veterans.

Thus, there is a gap between the parliamentary-presidential assessment and governmental monitoring, which is exacerbated by the shortcomings of the assessment and monitoring systems of each of these three actors.

The Parliament did not develop and/or use policy monitoring tools during the period under review (2014-2021). The provisions on post-legislative oversight appeared only in August 2023 (and will come into force only after the end of martial law). Recommendations on a unified reporting format and oversight plans have not been implemented. The Accounting Chamber did not monitor the veteran policy in 2014-2021.

The Cabinet of Ministers, for its part, focused on measures without tracking the impact of these measures (i.e., the policy implemented) on the policy beneficiaries (veterans): there were no plans to study the impact on beneficiaries, no organisational, human and financial basis for this, no indicators; the objectives of programmes and policy goals did not have their own indicators of achievement and were disconnected from the implementation of measures. As a result, there was no effective mechanism for providing reliable and verified feedback from veterans. In addition, there was a gap between government-wide and budget planning, which was based on the principle of implementing measures rather than addressing veteran issues.

We can also highlight **the lack of indicators aimed at measuring the impact of the policy on veterans**. Such indicators should be the primary means of measuring the effectiveness of veteran policy. These indicators should focus on the extent to which the veteran policy meets the needs of veterans and solves their problems. Instead, the indicators included in the policy documents almost always measured the policy outputs, such as the number of services provided. However, such an indicator does not tell us about the impact of the policy on veterans. If this is a rehabilitation programme, its indicators of impact on veterans should focus on the number or share of successfully rehabilitated veterans (the ratio of the number of veterans to the number of those who had positive dynamics), based not on the fact of providing a service, but on the impact of providing such a service on veterans. Measuring the number of days spent in sanatoriums does not tell us anything about the improvement of veterans' health. The real indicators of the impact on veterans, depending on the specific programme, could be the level of general well-being, mental well-being, employment rate, divorce rate, discharge rate, alcoholism (or the prevalence of other addictions), socialisation rates,

etc. In fact, the absence of such indicators of policy impact on veterans has led to the fact that in many areas, the effectiveness and impact of the measures implemented on veterans is unclear, and there is no evidence base to confirm (or refute) the expediency of further use of such policy instruments. It is unclear whether the policy instruments need to be changed. In other words, the main function of the policy monitoring and evaluation stage is not fulfilled. As a result, a new iteration of the policy cycle begins not with a proven and verified identification of problems, but with political speculation, general complaints from stakeholders and a statement of fundamental problems that are disconnected from the policy being implemented. Consequently, advocacy for solving these problems at the stage of agenda setting and policy adoption has poorer arguments, and during policy development, the choice of alternatives, development of new instruments, and selection of indicators are made in an unreasonable, almost random manner.

Policy monitoring and evaluation is the last stage of the policy cycle. After it, a new round of the policy cycle is launched. In fact, monitoring and evaluation makes it possible to identify policy problems - the first stage of the policy cycle, which we described at the beginning of the study. As a result, the policy can be changed or even terminated as ineffective or inefficient. **The shortcomings of the policy monitoring and evaluation stage thus had an impact on other stages of the policy cycle.** The Cabinet of Ministers did not have an adequate understanding of the problems with achieving the goals of the veteran policy and therefore did not play a proactive role in initiating changes to the veteran policy. After all, according to government reports on the implementation of programmes and plans, all measures were being implemented, which means (in the government's logic) that the policy goal was automatically achieved, and the problems of veterans were automatically solved. Instead, MPs who received sporadic feedback from veterans and civil society representatives understood that the policy needed to be changed, but they mostly did not understand how to change the policy and what exactly went wrong in the process of implementing the policy. The quality of their proposed solutions suffered from this lack of understanding, as they were far removed from the government's reality.

Thus, the shortcomings of monitoring and evaluation hampered veteran policy at other stages of the policy cycle. At the stage of problem identification, the government had a distorted view of veteran issues, and MPs did not understand the policy shortcomings sufficiently. Both the government and MPs did not have reliable information on the effectiveness and efficiency of the impact of the policy measures taken on veterans, meeting their needs and solving their problems. At the agenda-setting stage, it was more difficult to promote the importance of addressing the identified problems, as these problems were scattered and not supported by verified and regular data collected through evaluation and monitoring. The policy development stage was similarly hampered by the lack of data that should have been collected through policy evaluation and monitoring, which made it difficult to develop solutions and to set indicators (which should have been set at the time of policy development). The problems created by weaknesses in policy monitoring and evaluation at the stages of problem identification, agenda setting and policy development then negatively affected both policy adoption and implementation, and ultimately further complicated policy evaluation and monitoring during the new "round" of the veteran policy cycle.

7. Constitutional Constraints on Reforming Veteran Policy and Possible Solutions

The content of this chapter is based on the analysis prepared by the Centre of Policy and Legal Reform for this study.

A comprehensive review of veteran policy from 2014 till 2021 would be incomplete without a detailed examination of the Constitutional Court's decisions which have framed the reform of this policy. This framework had a significant impact on both policy development and adoption. The late 2028 decision of the CCU, along with some other developments, such as the establishment of the Ministry of Veterans and the adoption of the Programme on Rehabilitation, represents a turning point between the second and third phases of Ukraine's veteran policy.

The impact of the position of the Constitutional Court on veteran policy lies in the establishment of limitations on its modification. These limitations are based on social guarantees enshrined in the Constitution of Ukraine, which require a special procedure for amendment. To understand the meaning of these restrictions, it is necessary to consider some of the most important concepts employed by the Constitutional Court, which impose boundaries on the scope of potential reforms. Moreover, **just as the analysis of the veteran policy case allows us to examine in detail the system of decision-making, the analysis of the Constitutional Court's positions in this area raises the question of fundamental limitations in reforming public policy in many other areas.**

The Constitutional Court of Ukraine is the only body of constitutional jurisdiction tasked with promoting democratic culture and ensuring compliance with the Constitution and its essential content, in particular in the matter of guaranteeing human and civil rights and freedoms. The definition of Ukraine as a social state³¹⁵ and its recognition of a human being as the highest social value³¹⁶ **imposes obligations on the state to ensure citizens' right to social protection³¹⁷ as one of the necessary conditions for the existence of individuals and society** (paragraph six of subclause 3.1 of clause 3 of the reasoning part of the Decision of the Constitutional Court of Ukraine of 4 June 2019 No. 2-r/2019).

7.1. The Concept of Social Protection

The provisions of Articles 1, 3, 21, 46, 48 of the Constitution of Ukraine require the state to establish an effective system of social protection for various categories of individuals, which would help to harmonise their living standards with the right to an adequate standard of living for themselves and

315 Article 1 of the Constitution of Ukraine, adopted at the fifth session of the Verkhovna Rada of Ukraine on 28 June 1996 // Bulletin of the Verkhovna Rada of Ukraine.

316 Ibid. Article 3.

317 Ibid. Part 1 of Article 46.

their families by providing appropriate social security measure (paragraph four of subclause 2.3 of clause 2 of the reasoning part of the Decision of the Constitutional Court of Ukraine No. 5-r/2018 of 22 May 2018). The level of social security in the state should meet the needs of citizens, which will promote social stability, ensure social justice and trust in the state (paragraph six of subclause 3.1 of clause 3 of the reasoning part of the Decision of the Constitutional Court of Ukraine of 4 June 2019 No. 2-r/2019).

Social protection is primarily revealed through the concept of the right to social security in case of full, partial or temporary disability, loss of the breadwinner, unemployment due to circumstances beyond the control of citizens, as well as in old age and in other cases provided for by law. Social protection is associated, in particular, with the inability to have earnings (labour income), its loss or insufficient level of living standards for a citizen and disabled family members (*paragraph three of clause 3 of the reasoning part of the Decision of the Constitutional Court of Ukraine of 28 April 2009 No. 9-rp/2009*). In interpreting Article 46, the Constitutional Court concludes that the state has undertaken to take care of each citizen in the event of one of these cases and to provide them with permanent social benefits (social assistance), which must be systematically paid within certain periods determined by law and in an amount that cannot be lower than the subsistence minimum established by law for the relevant category of individuals, provided that a pension or other type of social benefit or social assistance is the primary source of subsistence for such a person (*paragraph one of clause 3 of the reasoning part of the Decision of the Constitutional Court of Ukraine of 22 April 2020 No. 3-r(l)/2020*).

7.2. Implementation of Social Rights by the State

In its *Decision of 7 November 2018 № 9-r/2018*, the Constitutional Court concluded that the state cannot renounce its obligations or abolish any component of the right to social protection as defined in Part 1, Article 46 of the Constitution of Ukraine.

However, other aspects of the right to social protection not specified in the above-mentioned provision may only be determined by the Verkhovna Rada of Ukraine through the adoption of laws, as provided for in Article 92 of the Constitution of Ukraine. Therefore, the Parliament has the authority to change, abolish or restore the specific conditions for access to social benefits provisions when formulating the state's social policy.

This is due to the fact that the state is obliged to guarantee the right to social protection, but the implementation of such activities must align with the state's other duties and functions. Part 1 of Article 17 of the Constitution of Ukraine stipulates that the protection of Ukraine's sovereignty and territorial integrity, as well as ensuring its economic and information security, are the most important functions of the state. Accordingly, the state's social policy should be implemented within the limits and in a manner that does not jeopardise the performance of its most important functions.

In its *Decision of 26 December 2011 No. 20-rp/2011*, the Constitutional Court noted that the socio-economic rights provided for by law are not absolute. The mechanism for exercising these rights may be adjusted by the state, in particular, due to the impossibility of their financial support through proportional redistribution of funds in order to maintain the balance of interests of the whole society. In the event of a significant deterioration in the financial and economic situation, martial law or a state of emergency, the need to ensure the national security of Ukraine, the modernisation of the social protection system, etc., the state may redistribute its expenditures accordingly in order to maintain a fair balance between the interests of the individual and society (*paragraph five of subclause 2.3 of clause 2 of the Decision of the Constitutional Court of Ukraine of 22 May 2018 poky No. 5-r/2018*).

This opinion is also consistent with the provisions of international law³¹⁸ and the judgements of the European Court of Human Rights.

7.3. Conditions to Be Met When Changing or Repealing Specific Components of the Right to Social Protection

In several of its judgements, the Constitutional Court of Ukraine has identified the fundamental “red lines” that must be observed to preserve essence of the fundamental constitutional right. In particular, **the state cannot impose limitations that violate the essence of the constitutional social rights of individuals, which are directly linked to the state’s obligation to ensure, under all circumstances, sufficient living conditions compatible with human dignity** (*paragraph five of subclause 2.3 of clause 2 of the Decision of the Constitutional Court of Ukraine of 22 May 2018 No. 5-r/2018*).

In general, such restrictions must comply with the principle of proportionality, i.e. be socially necessary, appropriate and justified to achieve a legitimate goal using less burdensome means (*paragraph three of subclause 2.1 of clause 2 of the reasoning part of the Decision of the Constitutional Court of Ukraine of 1 June 2016 No. 2-rp/2016*).

Regarding the constitutional right to social protection, according to Article 46 of the Constitution of Ukraine, the **quantitative limit cannot be lower than the level of the subsistence minimum established by law**. The essence of this right is clarified through the **interpretation of Article 21 of the Constitution of Ukraine: the right to social protection must ensure proper living conditions for individuals within society, preserving their human dignity** (*Decision of the Constitutional Court of Ukraine of 7 November No. 9-r/2018*). In its *Decision of 22 May 2018 No. 5-r/2018*, the Constitutional Court of Ukraine further defines **the concept of human dignity as a right guaranteed by Article 28 of the Constitution of Ukraine, representing a constitutional value that gives meaning to human existence, is the foundation for all other constitutional rights, a measure of determining their essence and a criterion for the admissibility of possible restrictions on those rights** (*paragraph six of subclause 2.3 of clause 2*).

7.4. Social Protection of Service Members

The Constitutional Court of Ukraine has developed its own legal position regarding the social protection of service members, recognising it as a matter of special significance. **The Court distinguishes the social protection of service members as a separate category of Ukrainian citizens requiring additional state guarantees**. This is due to several factors identified in the *Decisions of the Constitutional Court of Ukraine of 20 March 2002 No. 5-rp/2002 and of 17 March 2004 No. 7-rp/2004*:

- Restrictions on certain constitutional rights and freedoms (freedom of movement, free choice of residence, the right to leave the territory of Ukraine, the right to be members of political parties and public organisations with political aims, the right to entrepreneurship, etc;).
- Performing service that involves a risk to life and health, increased requirements for discipline, professional aptitude, and specific professional, physical, volitional and other qualities.
- Peculiarities of the organisation of the service (additional duties performed outside of working hours or off-duty, increased level of responsibility).

318 Article 22 of the Universal Declaration of Human Rights // Bulletin of the Verkhovna Rada of Ukraine.

The Constitutional Court in its *Decision of 7 November 2018 No. 9-r/2018*, noted that **the social orientation of the state and the principle of social solidarity cannot replace an individual's personal responsibility for their own fate and the well-being of their family. The state's social protection system should encourage and not hinder a person's desire to improve their living conditions for themselves and their families.** However, when service members perform the duty of defending Ukraine, its sovereignty, territorial integrity and inviolability, they are restricted in their right to "earn material goods to ensure a standard of living higher than the minimum subsistence level for themselves and their families" (*paragraph ten of clause 3 of the Decision of the Constitutional Court of Ukraine of 17 March 2004 No. 7-rp/2004*).

Therefore, Part 5 of Article 17 of the Constitution of Ukraine provides for special social protection aimed at ensuring an adequate standard of living for service members and their families, which is not limited by the conditions and level set out in Article 46 of the Constitution of Ukraine. The Court sees the peculiarity of such protection in the fact that it does not depend on the financial situation of service members and their families and should not be conditioned by the lack of financial capabilities of the state. In other words, measures **aimed at ensuring social protection of this category of individuals by the state, especially concerning economic expediency and socio-economic circumstances, cannot be cancelled or reduced** (*paragraph eight of subclause of clause 2 of the Decision of the Constitutional Court of Ukraine of 20 December 2016 No. 7-rp/2016*).

The aforementioned Court decision established a clear distinction between the legality of limiting the social security of service members and other citizens of Ukraine in general. Later, the Constitutional Court will note that it **permits changes in the legal regulation of social protection [of service members and their families], emphasizing that the restriction or cancellation of social protection guarantees, in particular benefits, is possible only if equivalent or more favourable conditions for such protection are introduced** (*paragraph three of clause 5 of the Decision of the Constitutional Court of Ukraine of 18 December 2018 No. 12-r/2018*).

The foundation of social protection of service members and their families lies in the provision of social benefits stipulated by law. In general interpretation, **privileges are benefits established by law and granted to ensure the social protection of certain categories of citizens**³¹⁹. They are a form of social assistance and a necessary component of the constitutional right to an adequate standard of living, therefore, any **narrowing of the content or scope of this right by adopting new laws or amending existing laws is prohibited under Article 22 of the Constitution of Ukraine** (*paragraph fourteen of clause 5 of the Decision of the Constitutional Court of Ukraine of 11 October 2005 No. 8-rp/2005*).

However, at the same time, in its *Decision of 22 2018 No. 5-r/2018*, the Court recognised that **only certain benefits for specific categories of citizens are provided at the constitutional level.** In each specific case, it must be determined whether the benefits are aimed at ensuring adequate living conditions consistent with human dignity, which is the primary objective of the state social protection system. In other words, **each benefit must be evaluated for its "utility weight", whether it fully enables certain categories of citizens to achieve an adequate standard of living.**

Thus, **the practice of the Constitutional Court of Ukraine in cancelling or modifying the components of the right to social protection of service members and other categories of citizens is inconsistent and sometimes contradictory.** A service member, whose special status stems from the nature of their professional duties and several constitutional restrictions, is undoubtedly among the categories of Ukrainian citizens requiring additional social protection guarantees. However, by failing to recognise the socio-economic and financial circumstances of the state as a legitimate purpose for modifying the social security provisions for service members, the Court undermines one of the most critical functions of the state - ensuring its economic security, as enshrined in Part one of Article 17 of the Constitution of Ukraine.

319 Legal Encyclopaedia: In six vols. Kyiv: Ukr. encyclopaedia, 1998. Vol. 4. 560 p.

At the same time, the Court provides for the possibility of limiting or cancelling social protection guarantees in case of introduction of equivalent or more favourable conditions of such protection. To analyse the possibility of changing the social protection guarantees for service members to more favourable ones, it is necessary to assess the legitimacy of such a goal, the expediency of introducing new guarantees in comparison with the existing guarantees and to consider the special social protection of this category of Ukrainian citizens. **If we apply the above system of positions and interpretations of the Constitution of Ukraine by the Constitutional Court of Ukraine to the context of veteran policy, any changes to this policy in terms of limiting or cancelling benefits should have the following characteristics:**

1. Legitimacy of the goal

As a result of a full-scale war on the territory of Ukraine, the number of future war veterans and their family members, i.e. persons entitled to “veteran” benefits, will be unprecedented, reaching up to 5 million people³²⁰ (about 15% of the projected population of Ukraine), and the existing social protection system needs to be modernised due to its outdated nature, as the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” No. 3551-XII (as amended), effective from 22 October 1993, contains more than 40 benefits administered by various state authorities, yet access to these benefits is often complicated by bureaucracy³²¹. Some existing benefits are ineffective in terms of achieving useful results and are not utilised by service members (e.g., the right to priority installation of residential telephones under preferential terms). Creating an effective social protection system that meets the needs and interests of current active service members and veterans, contributing to their and their families’ well-being, rehabilitation and reintegration into civilian life is a justified and legitimate goal.

2. Relevance

Based on the essence of the right to social protection, which is to ensure adequate living conditions compatible with human dignity, the state may choose various ways and forms to fulfil this guarantee. Sufficient living conditions are not limited solely to the provisions listed in Article 48 of the Constitution of Ukraine and are not only about improving living conditions by providing material benefits. After all, the dignity of human life lies in the ability of individuals to sufficiently exercise their economic, political, social and cultural rights and to feel like equal members of society. The appropriateness of each benefit requires its assessment in terms of ensuring adequate living conditions compatible with human dignity. The cancellation of existing benefits and the introduction of new ones would be justified if they are found to create more favourable conditions for social protection and significantly improve living standards.

3. Special Social Protection for Service Members

As previously noted, the Constitutional Court has repeatedly emphasised the need for additional social protection guarantees for service members both during and after their service, due to the specific nature of their duties under Part one of Article 17 of the Constitution of Ukraine. Alongside the assessment of the appropriateness of the type of social security for compliance with the essence of the right to social protection, other criteria should also be considered. Specifically, whether a particular type of social security “will compensate for the statutory restrictions and conditions of service inherent in this category of citizens [service members] and increase the motivation of the personnel of the Armed Forces of Ukraine in performing their functions of

320 The number of citizens targeted by the policy of the Ministry of Veterans after the war may increase four times, up to five million people - Laputina // Interfax Ukraine News Agency. 2022.

321 Handbook “Analysis of the Social Protection System for Veterans and Service Members”, prepared by the NGO “Yurydychna Sotnia” with the financial support of the National Endowment for Democracy (NED).

defence of Ukraine, protection of its sovereignty, territorial integrity and inviolability” (first sentence of the fifth paragraph of subclause 3.2 of clause 3 of the reasoning part of the Decision of the Constitutional Court of Ukraine of 6 April 2022 No. 1-r(II)/2022).

7.5. Summary of Constitutional Limitations

In its Decision No. 1-r(II)/2022 of 6 April 2022, the Constitutional Court of Ukraine emphasises that the exercise of the right to social protection of service members and their families requires high-quality and effective legislative regulation and the introduction of mechanisms to ensure their state support. Such legislative regulation falls within the constitutional authority of the Verkhovna Rada of Ukraine, which determines the scope of social protection for military personnel at its discretion, not violating the essence of the constitutional right to social protection.

The social benefits that form the basis of social protection guarantees for service members have several key shortcomings, such as outdated provisions, bureaucratic application procedures (or the lack thereof), and inefficiencies. Consequently, these benefits fail to ensure the high-level of social guarantees required for such a special category of Ukrainian citizens as military personnel.

In general, the Constitutional Court in its practice does not impose absolute prohibitions on modifying or cancelling social protection of service members, instead consistently highlighting important conditions that must be met. At the same time, the definition of economic expediency and financial capabilities of the state as grounds that are not essential and should not be considered when regulating special social protection of service members and their families puts at risk the performance of one of the most important functions of the state - ensuring its economic security, enshrined in Part one of Article 17 of the Constitution of Ukraine.

The Constitutional Court of Ukraine is the only body of constitutional jurisdiction whose nature is to ensure compliance with the Constitution by both public authorities and society. Control over the implementation of the guarantees of human and civil rights and freedoms enshrined in the Constitution is one of the key tasks of the Court. Consistency and sustainability of the Constitutional Court’s practice is a guarantee of establishment and implementation of the constitutional order as a basis for the functioning of the state. However, the possibility of its change, especially in key issues requiring the achievement of a public consensus, considering the social, political and economic circumstances of the country, is a sign of the dynamism of the practice, which develops within the “spirit” of law and unchanging constitutional values. This, in turn, leaves room for the introduction of an effective and appropriate mechanism for the implementation of the right to social protection of service members and their families.

8. Why Have We Failed to Develop a Qualitatively New Veteran Policy and What Can Be Done About It?

The study of veteran policy through the lens of the policy cycle spans eight years: from the beginning of Russia's war against Ukraine in 2014 to the full-scale invasion in 2022 (with brief references to the periods before 2014 and after 2021). It is safe to say that no qualitative **changes in veteran policy have not been implemented during this time**. Admittedly, actions were taken, and in some areas, significant efforts were made. But from the perspective of policy outcomes - meeting veterans' needs and solving their problems—veteran policy has failed; **it has not achieved its goal**. Even if we extend the timeframe to 2023, despite some improvements, the overall situation remains unchanged.

So why has Ukraine failed to develop a qualitatively new veteran policy?

We argue that **there were systemic problems at all stages of veteran policymaking and cross-cutting issues in the decision-making system that prevented the development of a qualitatively new veteran policy**.

8.1. Problems at Various Stages of the Veteran Policy Cycle

At all stages of the political cycle, the process of developing veteran policy faced systemic problems.

At the stage of **problem identification**, the process of developing a veteran policy faced the fact that the policy already in place as of 2014 was aimed at solving problems and meeting the needs of veterans of long-ago wars and solved these problems by applying paternalistic post-Soviet instruments (dozens of benefits and social payments). These instruments were actually part of social policy, or even more specifically, pension policy. Providing benefits to pensioners/veterans was often used to gain electoral bonuses, not so much to solve the problems of veterans as to buy their loyalty. Since the start of the ATO in 2014, new problems have been identified, such as the perception of veteran policy as generally ineffective, the unmet demand for an organised return to civilian life, and the deterioration of mental health among veterans. The main problem in the old paradigm of veteran policy was the lack of funds for the implementation of this policy - not enough apartments purchased, not enough payments, not enough vouchers to sanatoriums. If we look at the problem identification stage more broadly³²², the dominance of the old approach can also be considered a drawback of this process. When stakeholders identified problems, ways to address them, and expectations from veteran

³²² The definition of a “policy problem” is a complex issue. There are two approaches here: 1) problems are only those identified by stakeholders (what they have realised and formulated), 2) what stakeholders propose may not be real problems, as external research shows a different perspective (factors that determine veterans' well-being, success, quality of reintegration, etc.), refuting stakeholders' theses. In other words, to what extent can the beneficiaries of the policy (in our case, veterans) independently determine what their problems are? The broader view referred to in this paragraph is described in the second approach.

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policy, they used the old model of “correct” veteran policy, the model of what should work and how it should work. Observing that the current state of play does not correspond to the “correct” model, in their opinion, they proposed to change the current situation in such a way as to bring it back to this “correct” model. The “correct” model in this case was the post-Soviet paternalistic approach. Both Ukrainian and international experience prove that at least not all elements of this model are effective and workable. However, a significant number of stakeholders continued to use it, identifying problems in this worldview paradigm. Thus, it has replaced some of the efforts to identify problems in another, more recent paradigm.

The problem of the paternalistic post-Soviet approach is not only and not so much in this approach, but also in its **inconsistency with the real circumstances, the current situation, economic and demographic characteristics of Ukraine**. The state is unable to fully satisfy the paternalistic demand, neither in quantitative nor qualitative terms. However, it is difficult to abandon this approach.

At the stage of **agenda-setting**, veteran policy faced problems of prioritisation and lack of consensus on fundamental issues. Public opinion surveys revealed that veteran policy was not perceived as sufficiently significant to constitute a separate category of societal problems. Controversial ideological foundations of the policy made it difficult for stakeholders to reach consensus on specific ways to reform veteran policy, as such initiatives clashed with broader debates about the social order, the social contract, the role of the state, etc. The controversial definition of a “veteran” has several dimensions: 1) should one have participated in combat to be considered a veteran? If so, should the definition of a veteran differ depending on the duration of participation in combat? 2) Can active military personnel be granted veteran status? 3) Should the new veteran policy apply to veterans of all wars (should contemporary veterans and veterans of the Second World War or the war in Afghanistan have the same status)? Different understandings of the objectives of the veteran policy, its lack of conceptual clarity, comprehensibility and precision hinder the identification of a specific set of instruments that will have public support both for agenda-setting stage and beyond into other stages of the policy cycle.

At the **policy development** stage, the challenges included the following issues: the non-strategic nature of policy planning documents, the absence or poor quality of policy planning tools, the poor quality of financial and economic calculations, the point nature of planned policy changes, constitutional shortcomings, and the low technical and legal quality. Between 2014 and 2022, the Verkhovna Rada, the Cabinet of Ministers, and the President failed to create a general strategy for the development of a new veteran policy (certainly, a strategy is only one of the means to meet the needs, not an end in itself). The number of systemic draft laws was extremely limited. Between 2014 and 24 February 2022, much of the development of veteran policy was still focused on the problems, goals and topics of the old policy. In most cases, policy planning documents did not use such policy planning tools as specific measures, deadlines, assigned implementers, resource analysis, performance indicators (including the definition of indicator, its baseline and target levels), monitoring measures, etc. Where such tools were included, they were often of poor quality. The absence or low quality of policy planning tools means that even good ideas of policy makers that are supposed to solve actual problems will not work, because the implementers of such policies will not have a clear framework for how they should implement certain decisions.

Both governmental documents and most draft laws lacked any or adequate financial and economic calculations. The problems with the financial and economic justification of draft laws are primarily due to the fact that they were almost exclusively initiated by MPs who lack expertise to prepare a high-quality financial justification and are not required to do so. At the same time, the submission of draft laws developed by the government through MPs indicates the low capacity of the Ministry of Veterans in terms of policy development. The low technical and legal quality of most veteran-related draft laws is also mainly due to the fact that they were initiated by MPs. All these problems were complicated by the 2018 CCU decision. The main idea that the developers of veteran policy drew from this decision

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is that existing benefits and social guarantees cannot be revised. Therefore, some of the ideas for reforming the veteran policy were killed at the stage of their formulation, and their authors did not proceed to the stage of policy development, realising that these ideas could not be implemented. Moreover, the CCU's decision came at a time when the Ministry of Veterans was being established, a body that was supposed to develop a new veteran policy. Thus, the constitutional restrictions imposed by the CCU were actualised for the representatives of the Ministry of Veterans. Those who did dare to develop and register a draft law came up with complex legal constructions to "circumvent" the 2018 decision, which exacerbated other policy development problems. The need to preserve old benefits leads to another problem in developing veteran policy - its high cost. New veteran policy instruments will require additional funds, but these cannot be transferred from old ineffective benefits. Stakeholders estimate that the cost of implementing new systemic laws ranges from UAH 88-180 billion. The developers of the veteran policy could not provide an answer to the question of "where to get these funds?".

At the stage of **policy adoption**, the veteran policy lacked a powerful lobbyist. The primary policy-makers were MPs, the weakest lobbyist of the three legislative initiative actors (they have less expertise and a lower level of political coordination and support). A relatively powerful lobbyist, the Committee on Veterans Affairs of the eighth convocation, disappeared in the ninth convocation. While the Ministry of Veterans was not able to perform lobbying functions, at least not with the same efficiency. The Ministry of Veterans also failed to ensure coordination of veteran policy with the most important stakeholders and, accordingly, to attract their support for the promotion and adoption of its initiatives. The political processes that accompanied the creation of the Ministry of Veterans and specific periods of its operation were unfavourable for the Ministry to act effectively as a lobbyist. Instead, representatives of the civil society were actively engaged in lobbying for veteran policy.

Attempts to reform veteran policy also encountered significant resistance from numerous stakeholders opposed to changes in the existing framework (i.e. the existing veteran policy). This is partly due to the fact that over the twenty years of its existence, the veteran policy has "overgrown" with a well-established system of implementation, which consisted of providers of benefits and services, recipients (both individual and united in associations), and the administrative apparatus (22 CEBs governed by 156 NLAs). Some of these relationships were even marked by corruption. Such stakeholders could support their arguments against changing the veteran policy with CCU decisions. The impossibility of changing the old rules means that the introduction of new rules in addition to the old ones would require more funds, which, in turn, turned against the initiatives on the new veteran policy both the stakeholders responsible for financial policy and those stakeholders who were supposed to redistribute funds in favour of veterans.

The problems of the previous stages of the policy cycle exacerbated the problems of this stage (low attention and priority of the policy, low technical and legal quality, etc.), as they reduced the attractiveness of initiatives to change the veteran policy and strengthened the arguments of those who opposed such changes. As a result, almost all adopted laws in the field of veteran policy were based on the consensus of equal justice, which means that different political actors do not object to the benefits of one category being extended to another category, since it is injustice to have benefits for one category of people and not for another. In other words, changes in veteran policy have consisted (almost exclusively) of its expansion - the extensive addition of new categories to the existing rules. Moreover, this process was self-reinforcing. New stakeholders were added to the old rules, and changing these old rules required the involvement (consultations, approvals, etc.) of these new stakeholders, which, in turn, made it difficult to change the old rules in a meaningful way.

Certain episodes of political struggle had a negative impact on veteran policy: this applies to both the direct use of veteran policy in political struggle and the consequences of such use. The consequences of this struggle that had a negative impact on veteran policy were the following: 1) extremely limited support for the initiatives of the parliamentary minority in the eighth convocation of the VRU, 2) politi-

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cisation of veteran policy - its use in the election campaign at the end of the eighth convocation and, as a result, 3) disengagement from veteran issues and their placement on the “extraordinary” agenda in the ninth convocation.

Very few initiatives have reached the stage of **policy implementation**. The only initiative that can be systematically evaluated is the Programme for Physical and Psychological Rehabilitation and Readaptation. The Accounting Chamber audited the implementation of this programme and found numerous violations, shortcomings and deficiencies, which, in turn, indicates the low capacity of the Ministry of Veterans to implement the policy.

The low capacity of the Ministry of Veterans had several reasons. The personnel core of the State Service, which had been implementing the veteran policy until 2018, was completely transferred to the Ministry of Veterans, and the informal practices of the State Service (internal motivation of employees, rules, customs, traditions, relationships, and the general working atmosphere) also transferred there. Consequently, the problems of the State Service, which were the reason for the creation of the Ministry of Veterans, were transferred to the Ministry of Veterans and revived. The Ministry was also affected by national-wide problems, such as low public sector salaries. Implementation of the policy was also complicated by the shortcomings of the Ministry's leadership. In the first two years of its existence, four ministers changed, and their teams, including the heads of the Ministry's structural units, also changed. They all had to re-establish work processes, build communication with stakeholders, recruit their own teams, etc. During the process of setting up work processes, the efficiency of new people is low. When the entire management changes in six months, it means that the new management must start all over again. The previous time is thus wasted. Due to the problems of institutional continuity, the direct work of predecessors was usually not used either.

The problem of staffing capacity was chronic, as about half of the positions in the Ministry were consistently unfilled (vacant), and this percentage only increased over time, reaching 89% in 2022. Each of the Ministers of Veterans Affairs had their own problems and limitations in their work, and each of them had their own shortcomings. As for external constraints, the biggest ones are as follows: 1) the launch of the Ministry of Veterans and the transitional political period until August 2019, 2) the merger and then separation of the Ministry of Veterans from the Ministry of Reintegration, 3) the COVID-19 pandemic, 4) the full-scale invasion of 24 February 2022. At the same time, three out of four of these restrictions hindered not only the work of the Ministry of Veterans but also the entire work of the Cabinet of Ministers. Under these conditions, some ministries were able to establish their work, while others were not. The problems of the previous policy stages - low priority of the policy, lack of a powerful lobbyist, shortcomings in policy development - exacerbated the problems at the policy implementation stage. A systemic problem that complicated the implementation of the policy was the dispersion of powers to implement the veteran policy among 22 CEBs. Such a system of implementation requires a strong coordinating body, which did not correspond to the capacities of the Ministry of Veterans, and therefore the problems of policy implementation only intensified.

At the stage of **policy monitoring and evaluation**, almost all the problems faced by the veteran policy were manifestations of general problems in the public administration system. The Verkhovna Rada carried out a general assessment of the veteran policy - an irregular and relatively arbitrary study of the existing problems of this policy. This gave the parliament an understanding that the veteran policy needed to be changed, but without knowing which policy instruments needed to be changed and how. The Cabinet of Ministers had developed tools for monitoring the implementation of measures, but tracking these measures largely replaced policy evaluation. This created a gap between monitoring the implementation of measures and assessing the achievement of the policy goal of impacting veterans. The tools to bridge this gap, such as unified reports of the executive branch, audit reports by the Accounting Chamber, and post-legislative oversight, were not used by the Verkhovna Rada. The Cabinet of Ministers, for its part, focused on measures without tracking the impact of these measures (i.e., the policy implemented) on the policy beneficiaries (veterans): there were no plans to study

the impact on beneficiaries, no organisational, human and financial basis for this, no indicators; the objectives of programmes and policy goals did not have their own indicators of achievement and were disconnected from the implementation of measures. As a result, there was no effective mechanism for providing reliable and verified feedback from veterans. In addition, there was a gap between government and budget planning, which was based on the principle of implementing measures rather than solving veterans' problems. There were also no indicators of policy impact on veterans to show how well the policies implemented were meeting the needs and solving the problems of veterans. Accordingly, there was also no proper evidence base to demonstrate the feasibility of further use of the policy instruments applied, which negatively affects the next iterations of the veteran policy cycle.

The shortcomings of the policy monitoring and evaluation stage thus affected other stages of the policy cycle, in particular, the stages of problem identification, agenda setting, and policy development. The Cabinet of Ministers could not adequately identify problems in achieving the goals of the veteran policy (in government reports, everything was being implemented and achieved), so it did not play a proactive role in initiating changes. On the other hand, MPs understood that the policy needed to be changed, but they mostly did not understand how to change the policy and what exactly went wrong in the process of policy implementation. The quality of their proposed solutions suffered from this lack of understanding, as these solutions were far from the government's reality. Worst of all, policy monitoring and evaluation did not provide reliable information on the effectiveness and efficiency of the impact of policy measures on veterans, meeting their needs and solving their problems.

All these issues at different stages of the policy cycle have had a specific impact on meeting the needs of veterans and members of their families. If certain needs are not being met by existing policies, then policy change is required to address them, and this requires first identifying these needs and the problems in meeting them, giving them sufficient political weight to be included in the agenda, developing solutions that will meet these needs, adopting these solutions, and once adopted, implementing and regularly monitoring and evaluating them to adjust policies that will meet the needs. Consequently, problems at each stage of the policy cycle have meant that veterans' needs have been slower and less well identified, solutions to address needs have been more difficult to get on the agenda, have been poorly designed, poorly approved, poorly implemented and poorly monitored and evaluated. Consequently, needs were not being met.

8.2. Cross-Cutting Issues in Veteran Policymaking

In addition to the systemic obstacles described above, each stage of the veteran policy cycle also had cross-cutting issues that are difficult to assign to a single phase. Their scale and influence on the effectiveness of veteran policy make it necessary to consider these issues as separate systemic deficiencies.

Inflated expectations were present at almost all stages of the veteran policy cycle. This has played and continues to play a negative role. Many officials have been constantly making promises to veterans for 8 years. These promises were both abstract and verbal, and clearly defined in policy documents - government programmes, priority action plans, strategies, etc. For example, on 12 December 2019, President of Ukraine Volodymyr Zelenskyy promised to present a housing construction programme for IDPs and JFO veterans to mayors and heads of RSAs within a month, but this promise was not fulfilled³²³. On a more formal level, the aforementioned audit report by the Accounting Chamber found that the State Target Programme was implemented by 67.4% in terms of performance indicators³²⁴.

323 Zelenskyy promised to present a housing construction programme for IDPs and JFO veterans to mayors and heads of RSAs within a month // Slovo i Dilo.

324 Over 83 affected participants of the Revolution of Dignity, ATO and war veterans did not receive free rehabilitation and readaptation services: Accounting Chamber Report. 2023.

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Satisfaction with politics is a subjective category that is determined by the correspondence of the result to expectations. The provision of new (often unrealistic) promises creates expectations among veterans. The constant failure to fulfil them means false expectations that are not met, and this, in turn, leads to dissatisfaction with the policy. At the same time, the achievements and positive results of the veteran policy are lost against the background of false and unmet expectations. This erodes veterans' trust in the state. Low trust in the state means that policy reforms are difficult.

False expectations have a negative impact on all stages of the policy cycle because: 1) replace real identification of current problems with demanding compliance with old, often unrealistic promises; 2) increase the inconsistency of the conceptual framework of veteran policy; 3) create legislative spam at the policy development stage, unbalancing promising initiatives with unrealistic promises; 4) create chaos at the policy adoption stage, prompting discussion of false expectations and empty promises instead of considering actual draft laws and reducing the level of support for them; 5) send mixed messages to policy implementers that lead to misunderstandings.

If additional links to this causal chain of unrealistic expectations, we can reasonably argue that **unfulfilled promises also negatively impact the willingness to join the defence forces and to continue serving with them.**

Some of the problems of veteran policy, particularly those related to the development, adoption and implementation of veteran policy, are not unique. These are **systemic problems that permeate the entire system of state policymaking**. They affect both the executive and legislative branches of government. These include the poor quality of parliamentary draft laws, the widespread problem of financial and economic calculations, unprofessionalism and unskilled staff, shortcomings in the civil service system, restrictions imposed by constitutional social guarantees, the unpredictable impact of political struggle on public policy, etc. Although these and some other problems are systemic, they can be circumvented or their impact mitigated. However, in the case of veteran policy, this was not achieved. The reasons why veteran policy failed to resolve/circumvent/mitigate particular systemic problems are different in each case and are examined in detail in the respective chapters dedicated to specific stages of the veteran policy cycle. In a very generalised way, these reasons can be summarised as follows: veteran policy had a low priority - politicians, policy makers and most stakeholders gave priority to other areas of activity. The Agency for Legislative Initiatives explores these and other systemic issues in the field of public policy, for example, in documents on parliamentary reform, parliamentary monitoring, civil service reform, etc.

Problems related to the representation of veterans' associations. ATO/JFO veterans formed thousands of organisations that did not have a single or at least several organisational centres:

"6,000 ATO veteran organisations. What, all 6,000 [...] in the Council [referring to one of the councils that was formed, where members had to be elected - ed.] Because if there is a representative from each organisation, it's a football stadium"

This situation creates numerous obstacles for veteran policy makers to engage with veterans' organisations, as there are no clear partners recognised by the authorities who can engage in dialogue on behalf of a significant number of organisations (thus representing the veteran community). Even though the authorities have been actively trying to ensure the best possible representation of veterans when forming various councils under the Ministry of Veterans, it is challenging to assess how successfully this has been achieved, given the thousands of such organisations. This situation is partly due to the peculiarities of the regulatory framework and is better understood in comparison with the representation of veterans of the war in Afghanistan:

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“What’s another problem with veterans? The Afghanistan veterans have two organisations [...], there was a rule that to obtain the status of an all-Ukrainian veterans’ organisation, they had to have regional branches in 14 out of 27 administrative units. This rule was abolished, and now there are about 6,000 ATO veteran organisations: three people gather – and it’s an organisation. In fact, they have split up the ATO organisations, with many of them consisting of just a few dozen people”

Difficulties with the representation of veterans’ associations at the stage of problem identification meant that each organisation could identify its own individual problems related to a particular situation, bringing them to the authorities and creating the impression of individual shortcomings in the administration of veteran policy, rather than systemic and conceptual problems with the entire policy. Accordingly, these identified systemic problems were diluted by thousands of individual cases. All these initiatives then competed for inclusion on the agenda, making it difficult for decision-makers to prioritise various initiatives and understand the needs of veterans. The same thing happened at the stages of policy development, policy adoption, and implementation: various organisations conveyed different messages to decision-makers, who could not clearly articulate for themselves what the majority of veterans needed most and what were less important individual issues. In such a situation, it is also difficult to know who to consult at different stages of policymaking. Therefore, decision-makers tend to choose the most convenient problems (that can be solved most easily) and the most convenient organisations (such loyal organisations are also often included in various advisory bodies) and focus (during consultations) on them.

Attempts to [re]form veteran policy in Ukraine in 2014-2021 took place in parallel with policy reforms in many other areas, such as healthcare, decentralisation, education, defence, security, etc. **Veteran policy was often uncoordinated and inconsistent with reforms in other areas.** Veteran policy has been the one to lose from this inconsistency. Here we will give only two illustrative examples (although the problems of parallel reforms are present in many other cases).

A significant part of the powers and resources for these powers were transferred from the state level to the community level as part of **the decentralisation reform**. In this regard, the provision of social and administrative services should be ensured by the community.

“A veteran returns not to an abstract Ukraine, where he is a hero, but to his own community”

The implementation of the veteran policy at the local level occurred separately from the decentralisation reform. Small units were created within RSAs to deal with veteran policy in the regions, but they had poor logistical support:

“They are few, with very low salaries. They usually sit in a cold office within the RSA, which no one minds giving away because the Ministry asked for it, and someone needs to be accommodated. Their logistical support falls on the Ministry, which is based in Kyiv and is not particularly interested in what is happening on the ground, except until something goes wrong. They worked either with their own equipment or had to improvise. It was awful”

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In addition to insufficient material resources, there were also staffing issues, and problems with coordination with both local authorities and the Ministry of Veterans:

“The Ministry of Veterans is somewhat detached from the reality on the ground, developing something that is not clear to them. No one knows what’s going on”

As a result, if local authorities paid any attention to veteran issues, they did so at their own discretion, which resulted in each region or even community having its own veteran policy:

“Some regions have started to make programmes, but it’s all very random”

Often, this policy was limited to individual payments or the creation of infrastructure. The activities of the departments that were supposed to deal with veteran policy were not effective enough:

“There was a decision to create it, it was created quickly, and people were hired wherever possible with salaries for absolutely useless positions. There was this office in every RSA, doing nothing”

The problems of veteran policy at the local level and in the regions negatively affected several stages of veteran policy development. First, it complicated the formation of consensus on fundamental issues of veteran policy (e.g., who is a veteran or what should be the goals of veteran policy), because, in addition to the vision of the Ministry of Veterans, there were many local perspectives that had developed due to varying experiences in creating and implementing local veteran policies, i.e., a lack of dialogue and coordination.

Secondly, policy development was hampered, as government lawmakers in Kyiv were disconnected from the realities faced by veterans in communities, from the specifics of financing these services, and had no feedback on how veteran policy actually works and affects the ultimate beneficiaries. Thirdly, majoritarian MPs who received regular feedback from local authorities and residents of their constituencies on veteran policy sometimes had differing views and understandings of veteran policy, both among themselves and with the Ministry of Veterans, which authored the two largest veteran-related draft laws. This determined the level of support for the government’s draft laws from majoritarian MPs, as well as the fact that these MPs promoted an alternative agenda. Fourthly, the worst impact was seen in the implementation stage, when the incapable “cold offices in the RSAs” struggled to implement veteran policies in an uncoordinated manner, inconsistent with the initiatives of local authorities.

Another example is **healthcare reform**. Unlike the veteran policy, the healthcare reform has received a lot of public attention and has been largely implemented. However, healthcare is one of the most important components of the veteran policy, and the veteran policy regulated the healthcare system in a certain way, and the two systems came into conflict:

“...along with the creation of the Ministry of Veterans, the healthcare reform was launched, and there was a conflict between two equivalent laws. [...] their powers are the same, but they contradict each other. [...] the Ministry of Health

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says - [...] veterans are good, but there are 400,000 veterans, and there are 10 million cardiovascular patients. These are completely different categories of people, numbers, and scales”

Parallel, uncoordinated reforms led to a situation where it was difficult to make sound planning, resulting in strange and incomprehensible situations:

“...long ago, the Government Action Plan included the development and inclusion of separate veterans’ medical guarantee packages in the medical guarantees programme³²⁵ [...] It was submitted, the Ministry of Health agreed, the government voted for it, and then it turned out that this couldn’t be done because there is no such thing as “separate packages”. [...] The Ministry of Health agreed that separate veteran packages should be created, although it was impossible to do so. Okay, let’s remove it. No, it cannot be removed, because we keep saying that we will create veteran packages. No one cares that it is impossible to do so. [...] this wording was used year after year until we sat down with the National Health Service. They said they couldn’t do it, [...] they didn’t know who wrote it. For several years, it was just shifted around”

To resolve this situation, “crutches” had to be used, and in the context of the entire medical system switching to the new system, veteran hospitals were separated from it. This issue was even raised at the level of the TSC on Veteran Policy:

“In turn, the Commission submitted to the Parliament a draft resolution of the Verkhovna Rada of Ukraine on preventing the suspension of the functioning of war veterans’ hospitals during the implementation of the second phase of healthcare reform, which recommends that the Cabinet of Ministers of Ukraine postpone the transition of veteran hospitals to a new funding system through the National Health Service of Ukraine for one year and maintain funding for war veteran hospitals though by transferring a subvention from the state budget through the Ministry of Health of Ukraine”³²⁶

The lack of coordination between veteran policy reform and healthcare reform also had a negative impact on many stages of veteran policy development. The competition between different models of providing medical care for veterans, even at the governmental level, did not contribute to placing veteran policy initiatives on the agenda and advancing these initiatives through other stages of the policy cycle. The design and planning of the veterans’ healthcare system should have taken into account the general healthcare system, whose rules and characteristics were unknown due to constant changes. The lack of understanding of how general healthcare and veterans’ healthcare should be integrated diminished the attractiveness of veteran policy initiatives for decision makers, who viewed them as premature and underdeveloped.

³²⁵ In 2017, the practice of establishing guarantees for medical care was introduced - the Programme of State Guarantees for Medical Care of the Population (Medical Guarantees Programme) as a list and scope of medical services and medicines paid from the state budget on the basis of uniform national tariffs. In international practice, the established term for state guarantees of medical care is “state guaranteed package”.

³²⁶ On the Preliminary Report of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the Legal Status of War Veterans for the Six Months of Activity: Resolution of the Verkhovna Rada of Ukraine of 03.06.2020 No. 659-IX.

The absence of an “ecosystem” in terms of new areas of veteran policy complicated the development of this policy. The most significant challenge in this context is the lack of a market for service providers in specific areas of veterans’ affairs (for example, this applies to sports rehabilitation for veterans). Due to the absence of a market, 1) it becomes harder for veterans to formulate their requests and needs, and for policy makers to identify them; 2) fewer stakeholders push to include these issues on the agenda; 3) it becomes harder to develop a functional and economically optimal mechanism for meeting these needs, it is more difficult to make correct calculations (primarily financial), forecasts, and impact assessments; 4) due to the above challenges, the likelihood of approval for these initiatives is also reduced; 5) implementation of initiatives in areas where there is no established “ecosystem” and market means the actual absence of non-state actors and competition, which, in turn, leads to lower quality and accessibility of services at higher costs; 6) monitoring and evaluation of the policies are also complicated, because the sector operates under artificial conditions, with no adequate benchmarks to compare and define the quality of services provided or to determine their “effectiveness”.

A significant challenge for veteran policy is the **issue at the constitutional level**. This challenge is also cross-cutting and creates problems for many stages of the veteran policy cycle. In the Chapter “Constitutional Limitations of Veteran Policy Reform and Possible Solutions”, written jointly with the CPLR experts, an analysis of the legal context of these constitutional constraints is provided, along with a proposed way to change the policy that would not violate the legal positions of the Constitutional Court of Ukraine. However, these limitations are not purely legal in nature, but their **negative impact is also largely preventive, as it has changed the attitude of stakeholders to many veteran policy initiatives even before any decisions were made by the CCU on these initiatives**. In fact, in 2018, the Constitutional Court only annulled the provisions of one law, and it was a very special law, which, without any compensation and with a clearly defined motivation (budget savings), established an additional condition for receiving benefits, which led to the actual cancellation of these benefits for some recipients. However, the position of the Constitutional Court began to be proactively considered during the agenda setting process, the development of policy, and its adoption.

Problems at the stage of agenda setting intensified, as the CCU’s decisions convinced some stakeholders that it was impossible to change the status of some individuals. Consequently, contradictions between supporters of different definitions of the concept of “veteran” intensified - between those who consider only combatants to be veterans and those who prefer the current (legislated) definition of the status of “veteran”. Some emphasised the substantive nature of this status, while others stressed the legal restrictions on changing it. Developers of systemic draft laws on changing veteran policy also tried to consider the position of the CCU in a preventive manner: in one case, it was proposed to create a new status for those who did not participate in combat operations, and in another case, on the contrary, to create a new status for those who fought in the ATO/JFO. Such draft laws, which were supposed to be in line with the Constitution, were not always internally and logically consistent and adequately developed. Fears of drafting a law that would not comply with the Constitution discouraged an unknown number of initiators and working groups from attempting to develop policy. Despite the efforts of the developers, at the stage of policy adoption, stakeholders still did not trust the draft laws, citing the CCU’s decision, and as a result, these draft laws did not even reach the stage of consideration in the Verkhovna Rada. Thus, one decision of the CCU to **repeal a very specific law preemptively imposed restrictions on dozens of initiatives** to change veteran policy. In the Chapter entitled “Constitutional Limitations of Veteran Policy Reform and Possible Solutions”, a suggested pathway for policy change is proposed that aims to align with the legal positions of the Constitutional Court of Ukraine. However, as we are not the Constitutional Court itself, we cannot predict its future decisions.

In this context, perhaps the main mistake of the post-2013 veteran policy was made at the very beginning of the ATO, in May 2014³²⁷. This mistake was made with the best of motives - the desire to establish justice, to provide at least minimal state support to those who defended Ukraine's independence and territorial integrity. This mistake was made unconsciously, with the support of patriotic pro-European MPs (the draft law was approved by consensus, even without discussion)³²⁸. The mistake was that "everyone who participates in this operation, who defends with arms in hand, who takes part in real combat operations"³²⁹ was included in the general dysfunctional, inefficient, outdated system of the then veteran policy, a system that turned out to be extremely difficult to change and make work effectively. Changes to this system now had to consider the needs of ATO veterans and dozens of other categories equally.

8.3. Related Processes of Veteran Policy

Veteran policy, like any other policy, is not isolated from the world; the process of its formulation, even if it does not achieve its intended outcome, has consequences and impacts that extend beyond state policy, although these are still important. Seeing these consequences and influences is partly helped by another perspective of veteran policy analysis - considering the process of developing veteran policy as a politics of dissent, as well as analytical tools proposed in the conclusions of the book "Dynamics of Contention"³³⁰. In the process of formulating veteran policy, **new stakeholders emerged, polarisation occurred and the foundations for altering the scope of policy reform were laid**. At the end of this chapter, we will also examine some important processes for formulating veteran policy within the context of its **future dynamics**.

New stakeholders in veteran policy have emerged in several dimensions. First, of course, the key new stakeholder that emerged after 2014 was the ATO/JFO veterans themselves, who developed their own collective identity. In fact, their emergence launched a new iteration of veteran policymaking. Moreover, the dysfunctionality of certain state institutions has led to the fact that new stakeholders in veteran policy (broadly referred to as the "civil society sector in the field of veteran affairs") have begun to play functions that are atypical for the Ukrainian policymaking process. This primarily concerns policy development and implementation. In Ukraine, before 2014, it was common for policy to be formulated either by government officials (playing the role of expert civil servants, technocrats), the President or MPs (as representatives of parties, political forces, and expressors of ideologies and programmes), but not by the public sector. The passivity of the Cabinet of Ministers, the VRU and the President led to the civil society sector developing and proposing its own solutions to change the veteran policy - a good illustration of this is the process of creating the Ministry of Veterans. Another dimension where the civil society sector has begun to play an unusual role is in policy implementation. The civil society sector has started to meet the needs of veterans by providing various services in circumstances where the state did not. The most prominent examples of this are psychological assistance and rehabilitation, prosthetics, and legal advice. The civil society sector as a policy maker and service provider is not unusual in international practice, but this situation is atypical for Ukraine. Although veteran policy is not the only area where the role of the public sector is significant, its influence on veteran policy is significant and cannot be ignored.

327 On Amendments to Article 6 of the Law of Ukraine "On the Status of War Veterans and Guarantees of Their Social Protection": Law of Ukraine of 06.05.2014 No. 1233-VII.

328 Transcript of the Plenary Session No. 35 of 06.05.2014 // Verkhovna Rada of Ukraine. 2014. URL.

329 Ibid.

330 McAdam, D., Tarrow, S., & Tilly, C. (2001). *Dynamics of Contention*. Cambridge: Cambridge University Press.

The **polarisation and segregation** of veterans has already occurred in 2014-2021 and is likely to happen again. Polarisation and segregation are not only and not so much due to the behaviour of veterans themselves, who usually feel more comfortable sticking to their fellow veterans, replacing the pre-war social circle. The public perception of veterans has played a much greater role. The characteristic “veteran” became the primary marker in the eyes of non-veterans. This marker was more noticeable and defining than other categorical markers (e.g., profession, region of origin, religion, some physical characteristics). Often, this marker was used in the news when some negative events involving veterans took place - quite resonant were, for example, the blocking of the Metro Bridge³³¹ or the blocking of the entrance to the Cabinet of Ministers³³². However, in smaller conflicts and offences, such as a fight on the road between two drivers³³³, a conflict between a motorist and a cyclist³³⁴, a conflict over the theft of a wallet³³⁵, the media also used the marker “veteran” instead of identifying the functional role of the participants in the conflict (car driver, cyclist, passerby) or some other marker (e.g. male, entrepreneur, brown-haired). The segregation and subsequent polarisation of veterans concerned ATO veterans specifically, for example, veterans of World War II typically³³⁶ had other defining markers. Over time, segregation of veterans led to polarisation, i.e. an increase in the distance between the worldview, social circle, and beliefs of veterans and non-veterans. As a result, a certain proportion of civilians perceived veterans as different, aliens, which had long-term consequences for both veteran policy and society in general. One of these consequences is the involvement of veterans in crime, which, in turn, further segregated veterans in the eyes of society.

Veteran policy is directly linked to increased polarisation. Reintegration into society should be one of the important components of the veteran policy (some policy documents planned or at least declared measures for reintegrating veterans). The reintegration of veterans into society is a two-way process in which not only veterans have to change something in themselves, but also society has to change: norms, rules, and the general discourse of civil society have to be adapted to better understand veterans. In fact, veteran policy should ensure this two-way movement of society and veterans towards each other. The lack of an effective set of measures for the reintegration of veterans into society has provided space for growing polarisation. In addition, the veteran policy created another factor that contributed to polarisation. The overall failure of the veteran policy and the large number of unfulfilled promises have led to the disappointment of some veterans in the state and the civil society that forms this state. This disappointment, in turn, leads to feelings of resentment, alienation, segregation and polarisation.

Changing the scope of policy reforms can systematically improve not only veteran policy, but also other areas of state policy. Since 2014, Ukraine has embarked on a rapid path of reforms, changes in various spheres of public life, and shifts in public policy in these areas. The process of developing a veteran policy has revealed a large number of systemic problems that have arisen, are arising and will continue to arise in the course of reforms in Ukraine: rigid frameworks of regulatory (including constitutional) regulation, the dysfunctional role of the state (at least some of its institutions), a mismatch between financial capabilities and declared responsibilities and expectations, distrust in state institutions, etc. These phenomena are not unique to veteran policy. However, due to the low priority

331 The court sent an ATO veteran who threatened to blow up the Metro bridge in Kyiv for compulsory treatment // Babel.

332 An ATO veteran with a combat grenade threatened to blow up the Cabinet of Ministers building. He was detained // BBC News Ukraine.

333 In Kyiv, a fight broke out between an ATO veteran and a native of Donetsk. Video from the surveillance camera // Suspilne.

334 ATO veteran assaulted a man in Kropyvnytskyi after a remark // TSN.

335 By the way, in this conflict, in addition to the marker “veteran”, the marker “Roma” was also used: In Kyiv, an ATO veteran beat up Gypsies from Transcarpathia who stole a purse from a woman with three children (VIDEO) // Zakarpattia Online. 2020.

336 These people were referred to as World War II veterans mainly during the commemorative period.

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of veteran policy, they have been more pronounced in this area. If a large number of new veteran policy makers and implementers manage to establish an effective exchange of information, knowledge and views with institutionally similar new policy makers and implementers in other areas (particularly those working in healthcare and social services), they will be able to form a coalition and, based on a shared vision of a new model of public administration or, even more broadly, a social contract, propose large-scale cross-sectoral changes in approaches to organising and implementing state policy in Ukraine.

Speaking about the **future dynamics** of veteran policy, it is worth mentioning three processes that have already occurred in the past and have a high chance of repeating in the future: instrumentalization of trust in veterans, dissipation of public attention, and expansion of the circle of policy beneficiaries.

The instrumentalization of trust in veterans occurred in many social spheres after 2014. Political parties in both parliamentary and local elections since 2014 have tried to involve veterans to gain additional public support. Business structures have also tried to engage veterans as a means of additional legitimacy for their actions. Both political forces and business structures even created veterans' NGOs for this purpose:

"Everyone bought their own pocket veterans, created an organisation for their own veterans. And it was all such chaos, and the situation was the biggest enemy of the entire veterans' movement"

Sometimes, the involvement of veterans was used to legitimise illegal actions, such as raiding:

"Raiders and business, yes. Why do they need a veteran? He carries the status of an untouchable. Any conflict, any dispute — you put a veteran forward, and everyone's hands are tied. The police, everyone's hands are tied. The main thing is to have at least one veteran and a video camera right in front of him"

The instrumentalization of trust in veterans to legitimise dubious actions has led to a decrease in trust in veterans and the veterans' movement, resulting in reassessment of positive attitudes towards veterans, and ultimately has had a negative impact on veteran policymaking, making it harder to form consensus on key issues, creating additional obstacles to policy development and limiting the space for accumulating support for policy adoption.

The widening of the circle of policy beneficiaries is partly due to the instrumentalization of trust in veterans. In addition to including veterans in electoral lists, parliamentary parties may try to gain additional electoral points by expanding the circle of policy beneficiaries, i.e. by including new categories of people in laws that establish benefits for veterans. This has happened before, even prior to 2014.

In 1993, according to the first version of the Law, war veterans were considered to be *individuals who worked on the home front during the Great Patriotic War, including at enterprises, institutions, organisations and collective farms*.

Already in the 2000s, according to the new version of the Law war participants included *individuals who worked on the home front during the Great Patriotic War of 1941-1945 and the war of 1945 with imperialist Japan at enterprises, institutions, organisations, collective and state farms, individual farms, on the construction of defensive lines, procurement of fuel and food, drove livestock, studied during this period at vocational, railway schools, schools and colleges of factory training and other*

vocational education institutions, attended vocational training courses or while studying at schools, higher and secondary specialised educational institutions, worked in the national economy and on the reconstruction of economic and cultural facilities. Participants of the war also include persons who worked during the Great Patriotic War in the territories that became part of the former USSR after 1944, as well as citizens who, at the direction of the state authorities of the former USSR, worked in the states that were allies of the USSR.

In other words, if a person attended school or drove cattle between 1941 and 1945, they could obtain the status of a war participant and receive a large number of benefits. If we extrapolate this experience (applying the logic and principles of the previous dynamics of legislative changes) to the future, it is quite easy to justify why almost all Ukrainian citizens will be participants in the war with Russia. This applies to both volunteers and people who have worked in any job under Russian missile fire, including those far from the border with Russia and those in industries far from the defence sector. It is possible that the number of people covered by the benefits (privileges or opportunities) will not be increased immediately, but the participants in the election race will have incentives to do so. The experience of amending the legislation after 2014 shows that the logic based on the consensus of equal justice, according to which existing advantages (privileges) are easily extended to new categories of people, works quite effectively. An increase in the number of policy beneficiaries leads to the need to make a choice: to increase spending on such policies, or to reduce the quality of these benefits, or to distribute them less fairly and equitably. In other words, an increase in the number of policy beneficiaries usually leads to an imbalance in policy. Under conditions when benefits can only be added and cannot be cancelled (if we interpret the CCU's decision in this way), this may eventually bring any new veteran policy to the state it is currently in.

Dissipation of public attention to veteran policy, veterans and their issues happens consistently. In fact, the issue is not so much with veteran policy itself, but rather with the inability to constantly keep public attention focused on one topic. Attention to veteran issues is highest during active combat periods. Afterward, it dissipates, and the information space becomes filled with topics related to peacetime. This, in turn, leads to a slowdown in discussions on key veteran policy issues (the process of reaching consensus on these issues slows down), the policy development process becomes less prioritised, working groups meet less frequently, and political actors have less incentive to review and approve the developed policies. This pattern occurred from 2014 onwards. The intensification of public attention to veteran policy, along with the intensification of the development and adoption of this policy after 2014, occurred during the period of martial law. In 2018, the creation of the Ministry of Veterans and the approval of the Rehabilitation Programme occurred during a month marked by martial law. The current stage of intensified efforts to develop and adopt a veteran policy also occurred during the period of martial law and ongoing combat. Such events open a window of opportunity for veteran policy, which gradually narrows and closes over time as the intensity of combat decreases.

8.4. What Tasks Must Be Solved by the New Veteran Policy?

During our research, we studied the process of developing veteran policy, rather than specific best practices for reintegration, transitioning from military service to civilian life, psychological rehabilitation and prospects for their adaptation to current Ukrainian realities. Therefore, we do not provide specific recommendations on how to properly organise the transition from military service to civilian life, for example. Instead, we outline the main tasks that a new veteran policy must address in order to ensure that it has the best chance of successfully passing through all stages of policymaking and meeting the needs of veterans. It is important to emphasise that the specific content of the veteran policy and its implementation system must be a joint product of the government and civil society. Civil society can advocate for the adoption of certain documents, the creation of certain bodies, and the

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introduction of certain legislative changes. However, without the active role of the authorities, such struggle-won decisions risk repeating the fate of the decision to create the Ministry of Veterans.

So, what are the main tasks that the new veteran policy must solve?

Veteran policy must decide how to manage the **system of statuses**: what statuses different categories of people will have, what is the content of the statuses (what opportunities and benefits are provided by a particular status), and if the existing statuses are significantly changed, what to do with the categories that will be excluded from the new status system. Currently, **several alternatives can be identified, which are used in policy documents in various forms**. All of them involve either establishing additional benefits for statuses or revising the existing benefits (cancelling some of the old ones and introducing new ones), and the alternatives differ mainly³³⁷ in the way different categories of persons are distinguished by status. The first³³⁸ alternative³³⁹ is to differentiate between the statuses in such a way that the current veteran status remains for those who participated in combat operations (i.e., ATO/JFO/current war with Russia in a broad sense³⁴⁰), while a separate status is created for non-combat veterans (those who are veterans under current legislation but did not participate in combat operations). The first alternative is implemented in draft law No. 3407. The second alternative is to create a separate new status for veterans of the ATO/JFO/current war with Russia in a broad sense, with a new package of benefits, while all existing statuses remain in their current legislative form. Draft law No. 4389 proposed this alternative, providing for the possibility for veterans to choose a status at their own discretion. The third alternative is to simply provide new benefits within the existing system of statuses, which is not revised in any way in terms of the different categories of individuals belonging to these statuses. Dozens of draft laws have followed this path, offering mostly small and fragmentary (although some were comprehensive) benefits to existing veterans.

What should be included in veteran policy? **What services, opportunities, and benefits should be provided to veterans by the state?** It is difficult to identify clear combinations of benefits that veterans should receive (which would be part of veteran policy), but it is possible to describe the elements that could make up these combinations. Each of these elements can be instrumentalised and implemented in different ways, so here we refer to the general areas in which certain benefits should be provided. Thus, the elements of veteran policy most often include:

- ▶ Physical rehabilitation: a set of measures aimed at restoring the full functioning of the body.
- ▶ Medical support in the treatment of injuries and diseases.
- ▶ Psychological rehabilitation: a set of measures to preserve, restore or compensate for impaired mental functions, qualities, personal and social status of an individual, promote psychosocial adaptation to a changed life situation, and comprehend experience.
- ▶ Reintegration into civilian life: a set of measures that help veterans transform their skills, train and rethink how to transfer their combat experience into new experiences relevant to civilian professions - changing skills and lifestyle. Reintegration includes various other elements, such as

337 Of course, various policy initiatives also differ in terms of content but depending on the level of detail of the content, both 103 and 1003 can be distinguished, so we will leave this aspect out for now. Some fundamental and essential aspects of the content are discussed in other paragraphs.

338 The numbering of alternatives does not indicate their importance, priority or adequacy. The numbering here serves only as an ordering and labelling function.

339 Typically, a list of policy alternatives includes the so-called "zero alternative", which implies no action (leave it as it is, do nothing), but since we are considering policy options here, we do not include the zero alternative.

340 Theoretically, this status could be reserved exclusively for them, with participants in other conflicts given a separate status.

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retraining or psychological rehabilitation. There is a widespread procedure for reintegrating into civilian life called “transition from military service to civilian life”, which applies not only to veterans but also to professional military personnel who may never have taken part in combat in their lives. The approach to reintegrating and returning veterans or service members who did not engage in combat will vary depending on other factors: the length of service, whether they already had a profession and career before joining the army, whether the decision was voluntary or whether they were mobilised, the person’s age, and so on.

- ▶ Education: new education for veterans or their children, preferential admission to educational institutions, preferential conditions for dormitory accommodation, etc.
- ▶ Retraining: choosing a new profession, finding a place to retrain, learning new skills. Retraining is a narrower area than education. Retraining involves taking individual courses rather than obtaining a full-fledged new education.
- ▶ Employment: creating conditions for the economic employment of veterans, job search, assistance with passing the competition, integration into the workforce, stable and productive work, encouraging employers to implement veteran policies, information campaigns aimed at working with businesses, explaining the specifics of hiring and working with veterans.
- ▶ Entrepreneurship: distinguishing veteran entrepreneurship from non-veteran entrepreneurship, providing tax discounts or other benefits for such enterprises, providing grants for start-ups, business support for veterans and family members.
- ▶ Housing policy: obtaining housing on favourable terms, soft loans, free rent, etc.
- ▶ Sports: involvement of veterans in joint training and competitions. The purpose of veteran sports is to assist in reintegration and rehabilitation, however in terms of regulatory framework, infrastructure development, and independent initiatives for its growth, veteran sports can be considered a separate focus area.
- ▶ Respect and commemoration.
- ▶ Culture: support for veterans’ books, songs, poems, TV series, films, etc.
- ▶ Legal assistance.
- ▶ Material benefits: currently existing subsidies, discounts, compensations, as well as potential future material advantages that could be introduced in the future.
- ▶ Support for veterans’ associations: state support for NGOs, project competitions.

These areas may overlap, such as education and retraining, which intersect and include other elements. We present these areas separately because different veteran policy drafts follow this logic. Various statuses may offer different benefits (i.e., these benefits can be differentiated by status). A cross-cutting issue that applies to all types of veteran support is the accessibility of these benefits - the ease of obtaining what the state has promised to provide.

Should the **provisions of the current legislation** be modified (and if so, to what extent)? Or should an entirely new legislative framework be created? This task is primarily due to constitutional restrictions and the position of the CCU. The first alternative is to change the provisions of the current legislation. In fact, this alternative has many different ways of implementing how the provisions of the current legislation will be amended to comply with the position of the CCU. The second alternative suggests leaving the provisions of current legislation unchanged, while creating entirely new legislation.

How much should veteran policy cost and where can these funds come from? The first alternative involves redistributing the current level of expenditures by discontinuing some old benefits and using the savings to fund new advantages for individuals with veteran status. The second alternative involves an increase in spending on veteran policy, which is driven by the need to finance new expenditures without revising old ones. The third alternative is also to increase expenditures to finance the new benefits provided by the new veteran policy, but this increase is combined with a reduction in old expenditures (which is, in turn, due to the greater financial need for the new veteran policy). It would be logical to imagine a fourth alternative, which would be to significantly reduce the overall level of spending on veteran policy, but this alternative is not considered relevant, at least for the time being. The most realistic choice is between the second and third alternatives. The second alternative is the most expensive, but due to the cautious consideration of the position of the CCU, most initiatives to change the veteran policy follow this path. The third alternative is the most optimal, as it achieves a better balance of resources spent in relation to the results obtained. However, its choice will always depend on resolving other tasks. The alternatives presented in this paragraph relate to how to adjust spending levels, but do not answer the question of where to get the funds in case of an increase in spending on veteran policy. This issue is crucial, but providing a concrete answer always depends on the political priorities of the government.

The financing of veteran policy can, at least partially, rely on non-budgetary funds. International partners, together with Ukrainian civil society (in particular, through charitable foundations), will finance certain areas of veteran policy. This has been the case both now and in the past. Many new directions of veteran policy have been funded in this way - for example, the development of the veteran registry, psychological assistance lines, and veteran sports were funded and partially administered by international partners and Ukrainian NGOs. To make effective use of these resources, veteran policy must establish a clear framework for cooperation, define which areas should be the sole responsibility of the state (the state should then finance and implement them independently) and which should not. There is also a need for high-quality state coordination of those areas where international partners and Ukrainian NGOs can be involved.

An important cross-cutting issue that the new veteran policy must address is the choice of the **service delivery system design for veterans**. The first alternative envisages an inclusive system, where veterans receive services in the same institutions and according to the same standards as other citizens of Ukraine. The second alternative envisages an exclusive system, with specialized institutions providing services exclusively to veterans³⁴¹. Between these two alternatives, there is still room for a combination of exclusive and inclusive solutions depending on the context and the specific service. The choice of one of these approaches is a fundamental decision that determines where limited resources should be invested. In practical terms, a good quality inclusive system implies that mainstream services will be adapted to meet the needs of veterans as well, and if veterans access such a mainstream facility, they should be provided with sufficiently high quality services by the same professionals who provide services to non-veterans. An exclusive system, while also providing high-quality services, has the advantage of specializing in meeting veterans' needs (it was created for this purpose) but faces challenges in accessibility. That is, a sufficient number of specialised service providers (institutions/agencies/organisations) should be established to ensure that veterans throughout Ukraine have access to such services. In both cases, the decision to have an inclusive or exclusive system is closely linked to the resources required for creating these systems and the mechanisms for funding inclusive or exclusive facilities.

The healthcare sector provides a very illustrative example of the choice between exclusive and inclusive systems. Medical and psychological care and rehabilitation are among the most important expect-

³⁴¹ Of course, this can be combined with other categories of people, such as military personnel, but this does not change the main characteristic of such a system - the provision of services to a limited, clearly defined circle of people.

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tations of veterans. The general healthcare system includes family doctors, outpatient clinics, hospitals, etc. They are located all over Ukraine, but cannot always provide the services veterans need, as they have less experience with mine-blast trauma, shell shock, and other injuries. At the same time, there is a network of veterans' hospitals in every region where veterans can be treated. These hospitals are, on average, less well-funded than those in the general system. Veterans' hospitals have

more experience in dealing with injuries sustained in combat. A change in veteran policy towards strengthening the exclusive system would involve increasing funding for veterans' hospitals:

"In each region, since the time of the Great Patriotic War, there has been 1–2 veteran hospitals built [...] It would be better to allocate 50 million for each regional centre. Renovate them, equip them with modern technology"

The exclusive system exists in the United States (the US experience is often used as an example by supporters of the exclusive system³⁴²) and existed in the USSR (this experience, in turn, is used by opponents of the exclusive system).

Changing the veteran policy to an inclusive policy would involve the elimination of these veteran hospitals and the inclusion of veterans in the general healthcare system. An important argument of supporters of an inclusive system is the high cost of exclusive healthcare:

"...creating a parallel healthcare system for veterans, following the U.S. model. Logically, pursuing the second path doesn't make sense because it's both time-consuming and expensive, and we lack both the funds and the time"; "Investing significant money now in [...] a parallel system would mean taking funds from the general system, as the state's financial resources are limited. Very little money is allocated to healthcare currently, has been allocated in the past, and will continue to be limited"

What should the **system of veteran policymaking look** like? What is the role of the government and parliament? Who should be responsible for policy development? Who should implement veteran policy? What should be the configuration of powers of different executive bodies? Currently, it is envisaged that the Ministry of Veterans should be the primary developer and implementer of veteran policy. This situation may remain in the future (zero alternative). However, there are also alternatives that can follow two basic paths - increasing or decreasing the influence of the Ministry of Veterans. The first alternative is to introduce the post of Deputy Prime Minister for Veterans Affairs, who will coordinate the development and implementation of veteran policy in other ministries. The second alternative is to create deputy positions in ministries for veteran policy, such as deputy ministers for European integration or digitalisation. Both the first and second alternatives can be combined, both are aimed at ensuring a cross-sectoral approach, should ensure better policy coordination, and more effective promotion of the veterans' agenda. In both of these cases, the Ministry of Veterans may receive additional powers and must be institutionally strengthened to effectively fulfil the old and new responsibilities. The third and fourth alternatives are to reduce the influence and functionality of the Ministry of Veterans. The third alternative is to transform the Ministry of Veterans into a government

342 At the same time, opponents of the exclusive system point to the mismatch between the US experience and Ukraine's capabilities.

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project office that should exclusively develop policy (similar to the plan that existed when the Ministry was created), with the function of policy implementation being transferred to various CEBs. The fourth alternative is the complete elimination of the Ministry of Veterans and the transition to a model where the executive branch will not have a single developer and implementer of veteran policy, but instead different CEBs will deal with veteran issues independently. Both the third and fourth alternatives are much less likely for political reasons - there are fears that this will be perceived as an unfriendly step towards veterans.

Veteran policy should consider **the system of manning the Ukrainian defence forces**. Veterans form the basis of the operational reserve. They have combat experience that is extremely important for successful combat operations. The state is interested in being able to mobilise experienced soldiers into the defence forces if it is necessary to conduct large-scale combat operations. At the same time, this creates a situation where civilian non-veterans will have a competitive advantage over veterans who are not professional military personnel. Veteran policy should answer the questions of how to build a civilian life for veterans who will potentially be the first to be mobilised into the army, what mechanisms will be in place to ensure this civilian life, whether veterans need to undergo any additional military training on a regular basis, and if so, how often, and what compensation mechanisms will be in place for their employers. The decision to align the veteran policy with the defence manning system should be based on the future vision of the defence force structure.

What should **the veteran policy look like “on the ground”**? An important issue is the financing of such activities. Should it be state funding or local budgets, or what is the ratio? For example, the state can provide a minimum amount of funding, providing basic services, and local authorities can provide additional benefits to local veterans. It is important to ensure a certain level of social justice for veterans that does not have obvious regional distortions, which can be difficult to do in a situation where some regions have suffered more from Russian aggression than others. There are several alternatives to the system of ensuring veteran policy at the local level, which can be combined with each other. The first alternative is to transfer the entire local level of veteran policy to the responsibility of local governments with the Ministry of Veterans playing a coordinating role. The level of involvement of the Ministry of Veterans and the obligation of local governments to consider the Ministry of Veteran’s vision may vary. The second alternative is to strengthen the existing structure of the regional offices of the Ministry of Veterans by increasing their funding, staffing capacity, and establishing interaction with the Ministry. The third alternative involves establishing structural units within state administrations (primarily at the regional level) to address veteran issues. The fourth alternative, which has already begun to be implemented as part of a pilot project, involves creating the position of “veteran assistants”. Veteran assistants should be present in territorial communities with a ratio of one assistant per 100 veterans. The total planned number of veteran assistants is approximately 15,000 individuals. For comparison, this figure represents nearly 10% of Ukraine’s total number of civil servants³⁴³. Veteran assistants are expected to provide services on the “peer-to-peer” principle, meaning that veterans themselves or their family members will be recruited to these positions.

All these alternatives can be combined and should be implemented with consideration for other objectives. Implementing one veteran policy task without implementing others or without addressing the problems of veteran policy will be ineffective. For example, the pilot “veteran assistant” project risks repeating past mistakes in veteran policy. It has been criticised for the questionable ability of veteran assistants to solve veterans’ problems in communities when other components of veteran policy are outdated and ineffective. Criticism also extends to the inadequate regulatory framework for this project, the lack of standards, etc.: *“...the pilot project to introduce the institution of a veteran assistant is a “failure” both in terms of preparation and rejection by the veteran community. The lack of clearly defined qualification requirements for the relevant positions, [...] the lack of public consultations by*

343 The number of civil servants in Ukraine decreased by 4,678 in six months // NACS.

the Ministry of Veterans on the above-mentioned pilot project. If the pilot project is extended for the next year, there is concern that the UAH 3.8 billion allocated for the institute of veteran assistant in 2024 will be used inefficiently.”³⁴⁴

8.5. How Should a New Veteran Policy Be Developed?

Identification of problems. A decision must be made regarding which **issues the veteran policy should address and which should not**. Veteran policy can encompass more than fifteen subdimensions (areas), ranging from medical care, healthcare and psychological rehabilitation to cultural veteran policy. There are also issues related to existing but poorly functioning benefits. The process of identifying and prioritising problems should heavily rely on available research data, surveys, and the results of policy evaluation and monitoring data. Given limited resources (financial, organisational, staffing and time-related), the state cannot effectively address all the identified problems in veteran policy. **Prioritisation** is needed. The state must clearly define the problems it is ready to solve independently and those it is willing to delegate to the public sector.

The distribution of responsibilities for solving problems and prioritisation should result from public and expert discussions involving government representatives. These discussions could take place in the media. Based on the results of the discussion, at a later stage, a document, a Green/White Paper, can be created that would identify these problems, justify their prioritisation, and outline the allocation of responsibilities for addressing them.

Agenda-setting. A consensus policy framework should be discussed and defined - a framework that will define the basic issues of veteran policy: ideological issues, the definition of “veteran”, the purpose of veteran policy, etc. This consensus framework should be established following public and expert discussions with relevant governmental bodies playing a leading coordinating role. In addition, veteran policy should have a social impact and be an important issue for the entire Ukrainian society. Creating this consensus policy framework is ultimately the responsibility of the government, the “power triangle”, the entity that will take political leadership of the veteran policy development process. However, this process can also involve those outside the power triangle. The media can cover the process of developing veteran policy and provide a place for discussion on basic issues; sociologists can include veteran policy issues in public opinion surveys; research institutions and organisations, think tanks can conduct research on veteran issues; veterans’ associations and other representatives of the civil society sector can speak about veteran issues and engage in advocacy. All these efforts can make veteran issues visible and important and keep them on the public agenda. This, in turn, will create structural preconditions for government stakeholders to include these issues in their agendas, moving veteran policy issues further along the policymaking cycle. During these discussions, research and advocacy activities, different stakeholders will communicate with each other and exchange information. This, in turn, will allow for the development of a common, mutually agreed position on at least some of the fundamental issues of veteran policy, and the creation of a consensus policy framework that will be an excellent basis for policy development.

Policy development. Based on the results of the previous two stages, decisions must be made regarding changes to the veteran policy. At the policy development stage, the following decisions need to be made: what problems will be addressed, what tools will be used for this purpose, what result should be achieved, how to measure the achievement of the result (indicators, their baseline and target levels), what are the timeframes, what resources are needed for the implementation of the of the new policy, who will implement the relevant activities, how the process of implementation and

344 The Committee States: The Ministry of Veterans did not assume a leadership and coordinating role within the Cabinet of Ministers of Ukraine in the implementing of the state’s veteran policy.

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achievement of the objectives of the new policy will be monitored and how the progress of its implementation will be adjusted. Developing a new policy requires significant resources. Therefore, it must be the result of the collaboration among key stakeholders, under the overall coordination of a decision-making entity that will take on the political leadership of the entire policymaking cycle. The key stakeholders who should be involved in the development of new policies include the President, the Cabinet of Ministers (including the Ministry of Social Policy, the Ministry of Defence, the Ministry of Internal Affairs, the Ministry of Economy, the Ministry of Health, the Ministry of Education, the Ministry of Finance), the Parliament, local government representatives, civil society representatives and veterans' associations, in other words, the process of developing a new policy should be inclusive. Excluding any of these stakeholders will result in a poor policy design that will have problems either with certain aspects of planning, adoption, or implementation. Key documents required for the new veteran policy (draft laws or sectoral plans) should be prepared in a similar manner.

An essential aspect for this new policy is the calculation of the costs for its implementation and identifying sources of funding, including coordination with other stakeholders on the redistribution of resources. It is also important to establish a systematic approach that considers the positions of the CCU, which will safeguard against the negative consequences of constitutional challenges. It is also necessary to strengthen the institutional capacity of the new policy developer - the entity that will assume political leadership over this process and ensure direct coordination and organisation of the policy development.

Adoption of the policy. Veteran policy needs to have a leader among decision-makers. This could be the President of Ukraine, or a representative of the President (e.g., a specialised Commissioner or a specialised Advisory Council), or a leader from the executive branch (Cabinet of Ministers, Ministry of Veterans, Ministry of Social Policy), or a parliamentary leader (specialised committee). This entity, in the context of adopting the policy, must provide political leadership, i.e. convince decision-makers of the importance of adopting the key documents of the veteran policy and decisions that will include new veteran policy. In other words, the leader must lead a veteran coalition – a coalition of governmental and non-governmental stakeholders who support the new veteran policy. As of 2025, there is still a fairly wide window of political opportunity that facilitates the development of veteran policy and allows for navigating some of the challenges that may arise during the policy adoption process.

Issues with stakeholders who oppose changes to veteran policy should be addressed both through the proper organisation of the policy development process and through the formation of a broad coalition to support the changes in veteran policy, which will have enough influence to overcome the blocking stakeholders. The problem of using veteran issues in political struggle can also be resolved through a broad coalition in support of the new veteran policy. After all, any socially important topics will always be used in political struggle, political battles themselves do not prevent policy adoption, obstacles arise when veteran policy is on the wrong side.

If there is 1) a consensus among stakeholders on the issues to be addressed by the veteran policy (problem identification), 2) there is constant communication and information exchange, a common understanding of the fundamental issues of veteran policy and policy changes are considered to be of public importance (agenda setting), 3) an inclusive policy development process is ensured and high-quality policy documents are developed (with all elements of good policy planning) then forming a coalition in support of the new veteran policy and convincing stakeholders to approve the developed documents become realistic tasks. This approach enables breaking free from the trap of consensus of equal justice and approve fundamentally new changes to the veteran policy. At the same time, the existence of a single agreed policy framework will limit the potential for policy imbalance, as any proposed changes can be evaluated against their alignment with the established policy framework.

Policy implementation. In line with the new design of the veteran policy, a decision should also be made regarding the policy implementation system. If the Ministry of Veterans remains the primary implementer of the policy, decisions are needed to strengthen the capacity of this Ministry (organisational, financial, and human resources). Some of these measures fall within the scope of broader civil service and executive branch reforms. At the same time, some of the problems may be specific to the Ministry of Veterans, and a separate audit and assessment of the Ministry's activities may reveal them. Based on the results of the audit, it may be advisable to make decisions on personnel reshuffles, professional development of the Ministry's employees, filling vacant positions, and introducing new operational rules, including human resource management. In any case, the implementation system should result in ensuring that the bodies entrusted with implementation are able to perform the tasks assigned to them.

Policy monitoring. The developed, adopted and implemented veteran policy should be subject to monitoring and evaluation and constantly revised in response to the changing context. A well-designed policy (including a clear framework) should allow for easy tracking of the status of policy implementation and thus timely identification of problems and appropriate responses. To this end, policy monitoring and evaluation should combine both parliamentary and governmental efforts to monitor and evaluate policies. Parliament needs to better understand both the status of implementation of individual measures and the overall progress towards achieving policy objectives - the impact of state efforts on veterans. To improve its ability to monitor and evaluate, the Verkhovna Rada should use an expanded list of instruments, including post-legislative oversight, tools provided by the recommendations of the European Parliament Mission, and actively use the audit reports of the Accounting Chamber. The Cabinet of Ministers, for its part, should create a system for assessing the achievement of policy goals - its impact on veterans - by assigning independent indicators to each policy goal. Additionally, the government must create the organisational, human and financial foundations for conducting policy evaluation. This system ensures reliable feedback from veterans and shifts the government's focus towards achieving tangible outcomes rather than merely executing activities. It provides data on the impact (efficiency and effectiveness) of policy measures on the ultimate beneficiary - veterans. This impact is assessed using performance indicators, which provide the evidence base. In subsequent policy iterations, these indicators and the evidence base should be used primarily to identify policy issues. However, the evidence base will also be useful for agenda-setting, policy development, and policy adoption. As a result, both the Verkhovna Rada and the Cabinet of Ministers are aware of the problems in achieving policy outcomes and can make timely and informed policy changes.

Avoiding the **cross-cutting issues of veteran policy** is a more difficult task.

It is important to improve **communication support** for veteran policy. All decision-makers (the President, their representatives, the Cabinet of Ministers and relevant ministries, the Verkhovna Rada and the relevant committee) must act in accordance with the developed and approved veteran policy framework, avoid making promises outside its scope and refrain from creating false expectations.

The solution to **system-wide problems** that hinder the entire system of public administration in Ukraine, negatively affecting veteran policy in particular, cannot be accomplished solely within the realm of veteran policy. It requires cross-sectoral coalitions. Moreover, some of these problems require constitutional amendments, and thus cannot be addressed during martial law.

Creating an **"ecosystem" and market** for services in certain areas of veteran policy requires adequate funding (of course, regulations, training and other components are also needed) to enable at least a few non-state service providers to emerge to create a competitive environment and provide quality services at an optimal cost.

In the Chapter entitled "Constitutional Limitations of Veteran Policy Reform and Possible Solutions", we outlined possible solutions to addressing the **CCU's positions**. Some other strategies for considering the CCU's positions have already been developed and even registered in the form of draft laws.

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However, there is currently no definitive or universally correct solution to this issue. Any decision could potentially be challenged to the CCU, whose position cannot be accurately predicted. Amendments to the Constitution cannot be implemented during martial law, and even after it ends, they may encounter significant resistance unrelated to veteran policy. Some of the CCU's positions are generally based on Article 17 of the Constitution ("protected article"), which requires an all-Ukrainian referendum to change. There are no precedents for changing "protected articles" of the Constitution in Ukrainian history. In such circumstances, the best option seems to be to implement at least some variant of a new veteran policy, even though it may be constitutionally challenged. The consequences of not creating a new veteran policy may be worse than declaring certain legislative acts unconstitutional several years after their adoption.

Problems related to **the representation of veterans' organisations** can only be partially solved through regulatory frameworks. The only possible way to solve this problem is through self-organisation, dialogue and coordination between veterans' organisations, with their subsequent unification into several large veterans' associations that will represent the majority of such organisations and, accordingly, a significant part of veterans. It is no longer just about ATO/JFO veterans. A full-scale Russian invasion will significantly increase the number of war veterans. Some of them will join the existing ATO/JFO veterans' organisations (which are likely to change), while others will create new organisations. Therefore, ensuring quality representation of veterans' organisations will depend not only on existing but also on newly created veterans' associations.

The problems of **aligning veteran reforms with parallel reforms** can only be partially resolved. However, a capable coordinating body with political leadership in veteran policy will be able to ensure that veteran and parallel reforms are aligned and mitigate the negative consequences of possible discrepancies.

Annexes

Annex 1. List of legal acts, studies and other sources referenced in the study

1. Constitution of Ukraine: Official text.

The laws of Ukraine mentioned in the study:

1. Housing Code of Ukraine: Law of Ukraine of 01.08.2021 No. 5464-X.
2. Budget Code of Ukraine: Law of Ukraine of 01.01.2024 No. 2456-VI.
3. On the Status of War Veterans and Guarantees of Their Social Protection: Law of Ukraine of 22.10.1993, No. 3551-XII.
4. On Improving the Material Condition of Combatants and Persons with Disabilities Resulting from War: Law of Ukraine of 4.11.2018 No. 1603-IV.
5. On De-sovietisation of Ukrainian Legislation: Law of Ukraine of 21.04.2022 No. 2215-IX.
6. On Amendments to the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” regarding the introduction of a comprehensive review of the system of social protection of war veterans: Law of Ukraine of 24.03.2022 No. 2147-IX.
7. On Legislative Drafting Activities: Law of Ukraine of 24.08.2023 No. 3354-IX.
8. On Amendments to Article 6 of the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection”: Law of Ukraine of 06.05.2014 No. 1233-VII.

Resolutions of the Verkhovna Rada referenced in the study:

1. On the Preliminary Report of the Temporary Special Commission of the Verkhovna Rada of Ukraine on the Legal Status of War Veterans for the Six Months of Activity: Resolution of the Verkhovna Rada of Ukraine of 03.06.2020 No. 659-IX.
2. On the Programme of Activities of the Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of 19.04.2016 No. 1099-VIII.
3. On the Establishment of the Temporary Special Commission of the Verkhovna Rada of Ukraine on Legal Protection of War Veterans: Resolution of the Verkhovna Rada of 19.05.2020.
4. On the Appointment of Regular Presidential Elections in Ukraine: Resolution of the Verkhovna Rada of Ukraine of 26.11.2018 No. 2631-VIII.
5. On Preventing the Suspension of Operations of War Veterans’ Hospitals During the Implementation of the Second Stage of Healthcare Reform: Resolution of the Verkhovna Rada of Ukraine of 16.06.2020 No. 706-IX.

Resolutions of the Cabinet of Ministers of Ukraine referenced the study:

1. On Issues Related to the Ministry of Veterans Affairs of Ukraine: Resolution of the Cabinet of Ministers of Ukraine of 28.11.2018 No. 986.
2. On Approval of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of the Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation, for the Period until 2022: Resolution of the Cabinet of Ministers of Ukraine of 5.12.2018 No. 1021.
3. On Amendments to the Resolution of the Cabinet of Ministers of Ukraine of 5 December 2018 No. 1021: Resolution of the Cabinet of Ministers of Ukraine of 12.10.2019 No. 877.
4. On Approval of the Action Plan for 2021-2025 for the Implementation of the National Strategy for the Development of the System of Physical Culture and Sports Rehabilitation of War Veterans and Members of Their Families, Families of Fallen (Deceased) War Veterans: Resolution of the Cabinet of Ministers of Ukraine of 30.06.2021 No. 667.
5. On Amendments to the Resolutions of the Cabinet of Ministers of Ukraine of 31 January 2007 No. 106 and 18 July 2007 No. 950: Resolution of the Cabinet of Ministers of Ukraine of 21.04.2021 No. 377.
6. Certain Issues of Approval of the Maximum Number of Employees in the Apparatus and Territorial Bodies of Central Executive Authorities and Other State Bodies: Resolution of the Cabinet of Ministers of Ukraine of 5.04.2014 No. 85.
7. Certain Issues of the Ministry of Veterans Affairs: Resolution of the Cabinet of Ministers of Ukraine of 27.12.2018 No. 1175.
8. On Approval of the State Target Programme for Medical, Physical Rehabilitation and Psychosocial Readaptation of Affected Participants of the Revolution of Dignity, Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions, and Ensuring their Implementation, for the Period until 2023: Resolution of the Cabinet of Ministers of Ukraine of 5.12.2018 No. 1021.

Orders of the Cabinet of Ministers of Ukraine referenced in the study:

1. On Approval of the Concept of the State Target Programme for Physical, Medical, Psychological Rehabilitation and Social and Professional Readaptation of Participants of the Anti-Terrorist Operation and Persons Involved in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression by the Russian Federation in Donetsk and Luhansk Regions, and Ensuring Their Implementation for the Period until 2022: Order of the Cabinet of Ministers of Ukraine of 12.07.2017 No. 475-r.
2. On Approval of the Action Plan for Medical, Psychological, Professional Rehabilitation and Social Adaptation of Participants of the Anti-Terrorist Operation: Order of the Cabinet of Ministers of Ukraine of 31.03.2015 No. 359-r.

3. On Approval of the Action Plan for Implementation of the Programme of Activities of the Cabinet of Ministers of Ukraine and the Sustainable Development Strategy “Ukraine - 2020” in 2015: Order of the Cabinet of Ministers of Ukraine of 4.03.2015 No. 213-r.

4. On Approval of the Action Plan for 2019 and Subsequent Years Aimed at Ensuring the Development of Physical and Sports Rehabilitation of Combatants Who Participated in the Anti-Terrorist Operation, in Measures to Ensure National Security and Defence, Repelling and Deterring the Armed Aggression of the Russian Federation in Donetsk and Luhansk Regions: Order of the Cabinet of Ministers of Ukraine of 20.03.2019 No. 168-r.

5. On Approval of the Concept of the State Target Social Programme for Ensuring the Exercise of the Right to Housing for Persons Who Defended the Independence, Sovereignty and Territorial Integrity of Ukraine for the Period until 2025: Order of the Cabinet of Ministers of Ukraine of 9.06.2021 No. 618-r.

Programmes of Activities of the Cabinet of Ministers of Ukraine referenced in the study:

1. On the Programme of Activities of the Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine of 11.12.2014 No. 26-VIII.

2. On the Programme of Activities of the Cabinet of Ministers of Ukraine: Resolution of the Verkhovna Rada of Ukraine of 19.04.2016 No. 1099-VIII.

3. Programme of Activities of the Cabinet of Ministers of Ukraine, 2019.

4. Programme of Activities of the Cabinet of Ministers of Ukraine, June 2020.

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1. Government Priority Action Plan for 2016: Order of the Cabinet of Ministers of Ukraine of 27.05.2016 No. 418-r.

2. Government Priority Action Plan for 2017: Order of the Cabinet of Ministers of Ukraine of 3.04.2017 No. 275-r.

3. Government Priority Action Plan for 2018: Order of the Cabinet of Ministers of Ukraine of 28.03.2018 No. 244-r.

4. Government Priority Action Plan for 2019: Order of the Cabinet of Ministers of Ukraine of 18.12.2018 No. 1106-r.

5. Government Priority Action Plan for 2020: Order of the Cabinet of Ministers of Ukraine of 9.09.2020 No. 1133-r.

6. Government Priority Action Plan for 2021: Order of the Cabinet of Ministers of Ukraine of 24.03.2021 No. 276-r.

Documents of the ministries referenced in the study:

1. Draft Strategy for the Development of Entrepreneurial Initiatives of War Veterans. 10.11.2021.

2. Activity Plans of the Ministry // Ministry of Veterans Affairs. 2020.
3. Structure of the Ministry of Veterans Affairs of Ukraine // Ministry of Veterans Affairs of Ukraine. 2025.

Passports of budget programmes referenced in the study:

1. Passport of the budget programme for 2019 under CPCEL 1501010 “Management and Administration of the Affairs of Veterans, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine”: Ministry of Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine.
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5. Report on the implementation of the budget programme passport 1501030 for 2020: Ministry of Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine.
6. Report on the implementation of the budget programme passport 1501040 for 2020: Ministry of Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine.
7. Information on the achievement of the planned goal, tasks and performance indicators of budget programmes, as well as state policy objectives by the end of 2020: Ministry of Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine.
8. Report on the implementation of the budget programme passport 1501010 for 2021: Ministry of Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine.
9. Report on the implementation of the budget programme passport 1501030 for 2021: Ministry of Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine.
10. Report on the implementation of the budget programme passport 1501040 for 2021: Ministry of Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine.
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Ministry of Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine.

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Annex 2. Comparison of the evolution of powers of the executive body responsible for veteran policy

New text is **highlighted** in comparison with the previous version

	State Service for Veterans Affairs	Ministry of Veterans Affairs	Ministry of Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons	Ministry of Veterans Affairs
	Regulations on the State Service of Ukraine for War Veterans and Participants of the Anti-Terrorist Operation, approved by the Cabinet of Ministers of Ukraine on 10 September 2014, No. 416. As amended on 16.03.2018 ³⁴⁵	Regulations on the Ministry of Veterans Affairs of Ukraine, approved by the Cabinet of Ministers of Ukraine on 27 December 2018, No. 1175. As amended on of 27.12.2018 ³⁴⁶	Regulations on the Ministry for Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine, approved by the Cabinet of Ministers of Ukraine on 27 December 2018, No. 1175 (as amended by the Resolution of the Cabinet of Ministers of Ukraine on 16.10.2019, No. 887) ³⁴⁷	Regulation on the Ministry of Veterans Affairs of Ukraine, approved by the Cabinet of Ministers of Ukraine on 27 December 2018, No. 1175 (as amended by the Resolution of the Cabinet of Ministers of Ukraine on 15 April 2020, No. 276) ³⁴⁸
The scope of regulation	Clause 1. The State Service of Ukraine for War Veterans and ATO Participants is a central executive body of Ukraine, whose activities are directed and coordinated by the CMU through the Minister of Social Policy responsible for implementing the state policy in the field of social protection of war veterans and ATO participants, social and professional adaptation of service members being discharged, persons discharged from military service and ATO participants, within its authority, the state policy	Clause 1. The Ministry of Veterans Affairs of Ukraine is a central executive body whose activities are directed and coordinated by the CMU. The Ministry of Veterans Affairs is the primary body in the system of central executive authorities that responsible for the formation and implementation of state policy in the field of social protection of war veterans, persons who have special services to the Motherland, affected participants of the Revolution of Dignity, family members of veterans and persons covered by the Law	Clause 1. The Ministry of Veterans Affairs, Temporarily Occupied Territories and Internally Displaced Persons of Ukraine is a central executive body whose activities are directed and coordinated by the CMU. The Ministry of Veterans is the primary body in the system of central executive authorities that ensures the formation and implementation of state policy in the field of social protection of war veterans, persons who have special services to the Motherland, affected participants of the Revolution of Dignity, family	Clause 1. The Ministry of Veterans Affairs of Ukraine is a central executive body whose activities are directed and coordinated by the CMU. The Ministry of Veterans is the primary body in the system of central executive bodies that ensures the formation and implementation of state policy in the field of social protection of war veterans, persons who have special services to the Motherland, affected participants of the Revolution of Dignity, family members of veterans and persons

³⁴⁵ <https://zakon.rada.gov.ua/laws/show/416-2014-n#Text>.

³⁴⁶ <https://zakon.rada.gov.ua/laws/show/1175-2018-n/ed20181227#Text>.

³⁴⁷ <https://zakon.rada.gov.ua/laws/show/1175-2018-n/ed20191029#Text>.

³⁴⁸ <https://zakon.rada.gov.ua/laws/show/1175-2018-n/ed20200416#Text>.

	in the field of volunteering, and the social protection of certain categories of individuals.	of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection”.	members of veterans, persons covered by the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection”, and on the temporarily occupied territories in Donetsk and Luhansk regions and the temporarily occupied territory of the Autonomous Republic of Crimea.	covered by the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection”.
Main tasks	<p>Clause 3, part 1. Implementation of state policy in the field:</p> <p>Social protection of war veterans and participants of the anti-terrorist operation, in particular, providing them with psychological rehabilitation, sanatorium and resort treatment, technical and other means of rehabilitation, housing, educational services and burial arrangements; social and professional adaptation of discharged military personnel, persons discharged from military service, and participants of the anti-terrorist operation.</p> <p>Implementation of the state policy in the field of volunteer activity in relation to the provision of volunteer assistance within its powers to:</p> <p>Citizens who participate in the performance or provision of work related to the anti-terrorist operation, hostilities, armed conflict, including during the period of caring for the sick, disabled, lonely, elderly and other persons who, due to their physical, material or other characteristics, need support and assistance and reside in the area of the anti-terrorist</p>	<p>Clause 3, part 1. Formulation and implementation of state policy in the field:</p> <p>Social protection of veterans and their families, including providing psychological rehabilitation, social and professional adaptation, employment, increasing competitiveness in the labour market, as well as technical and other means of rehabilitation, sanatorium treatment, housing; providing educational services, lifetime state scholarships, annual payment of one-time financial assistance by 5 May (except for the organisation of such assistance);</p> <p>Granting, withdrawing status and issuing certificates to veterans; Preserving the mental health of veterans and their families;</p> <p>Honouring the memory of veterans;</p> <p>Provision of medical services by forming a list of medical services that are supplementary to the services guaranteed by the state under the programme of state guarantees of medical care for the population, in agreement with the Ministry of Health;</p>	<p>Clause 3, part 1. Formulation and implementation of state policy in the field:</p> <p>Social protection of veterans and their families, including providing psychological rehabilitation, social and professional adaptation, employment, increasing competitiveness in the labour market, as well as technical and other means of rehabilitation, sanatorium treatment, housing; providing educational services, lifetime state scholarships, annual payment of one-time financial assistance by 5 May (except for the organisation of such assistance);</p> <p>Granting, withdrawing status and issuing certificates to veterans;</p> <p>Preserving the mental health of veterans and their families;</p> <p>Honouring the memory of veterans.</p> <p>Temporarily occupied territories of Ukraine and the population residing there, with the ultimate goal of reintegrating them into a single constitutional space of Ukraine; Internally displaced persons from the temporarily occupied territories</p>	<p>Clause 3, part 1. Formulation and implementation of state policy in the field:</p> <p>Social protection of veterans and their families, including psychological rehabilitation, social and professional adaptation, employment, increasing competitiveness in the labour market, as well as sanatorium and resort treatment, housing; provision of lifetime state scholarships, annual payment of one-time financial assistance by 5 May (except for the organisation of such assistance);</p> <p>Granting, withdrawing status and issuing certificates to veterans and persons covered by the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection”;</p> <p>Honouring the memory of veterans.</p>

	<p>operation, hostilities, or an armed conflict;</p> <p>Social protection of certain categories of individuals referred to in paragraphs 11-14 of part two of Article 7 of the Law of Ukraine “On the Status of War Veterans and Guarantees of Their Social Protection” and family members of persons referred to in paragraphs four to eight of Article 10 of this Law, in terms of granting them the relevant one-time financial assistance.</p>	<p>Facilitating the promotion and ensuring the formation of a positive image of veterans.</p>	<p>of Ukraine, facilitating the exercise of their rights and freedoms and creating conditions for the voluntary return of such persons to their abandoned place of residence after the restoration of the constitutional space of Ukraine (reintegration) or integration at a new place of residence in Ukraine;</p> <p>Application of international humanitarian law within the territory of Ukraine;</p> <p>Peace building, restoration and development of Donetsk and Luhansk regions.</p>	
Main tasks	<p>Clause 3, part 2. Submission of proposals to the Minister of Social Policy to ensure the formation of state policy in the field of:</p> <p>Social protection of war veterans and participants of the anti-terrorist operation;</p> <p>Social and professional adaptation of service members being discharged, persons discharged from military service and participants of the anti-terrorist operation.</p>	<p>Clause 3, part 2. Ensuring the rights and interests of veterans and members of their families.</p> <p>Clause 3, part 3. Establishment and maintenance of an information and analytical accounting system for the administration of veterans’ needs.</p>	<p>Clause 3, part 2. Ensuring the rights and freedoms of veterans and members of their families.</p> <p>Clause 3, part 3. Ensuring the development and maintenance of the Unified State Register of War Veterans.</p>	<p>Clause 3, part 2. Ensuring the rights and freedoms of veterans and members of their families.</p> <p>Clause 3, part 3. Ensuring the development and maintenance of the Unified State Register of War Veterans.</p>
Powers: summarising the practice of applying the law	<p>Clause 4, part 1. Summarises the practice of applying legislation on issues within its competence, develops proposals for improving legislative acts, acts of the President of Ukraine, the CMU, and regulatory acts of ministries within its competence and submits them to the Minister of Social Policy in accordance with the established procedure.</p>	<p>Clause 4, part 1. Summarises the practice of applying legislation on issues within its competence, develops proposals for improving legislative acts, acts of the President of Ukraine and the CMU and submits them to the CMU for consideration in accordance with the established procedure.</p>	<p>Clause 4, part 1. Summarises the practice of applying legislation on issues within its competence, develops proposals for improving legislative acts, acts of the President of Ukraine and the CMU and submits them to the CMU for consideration in accordance with the established procedure.</p>	<p>Clause 4, part 1. summarises the practice of applying legislation on issues within its competence, develops proposals for improving legislative acts, acts of the President of Ukraine and the CMU and submits them to the CMU for consideration in accordance with the established procedure.</p>

<p>Responsibilities: coordination of activities</p>	<p>Clause 4, part 2. Coordinates the implementation of measures by state executive authorities and local self-government bodies on the issues of:</p> <p>Social protection of war veterans and participants of the anti-terrorist operation, providing them with benefits and guarantees as defined by law;</p> <p>Social and professional adaptation service members being discharged, persons discharged from military service and ATO participants.</p>	<p>Clause 4, part 8. <i>Coordinates, on issues within its competence, the implementation of measures by executive authorities and, in cases provided for by law, by local self-government bodies on issues of:</i></p> <p>Ensuring the rights and interests of veterans and members of their families;</p> <p>Social protection of veterans and members of their families;</p> <p>Honouring the memory of veterans; developing interaction and cooperation with civil society institutions;</p> <p>Promoting and ensuring the formation of a positive image of veterans.</p>	<p>Clause 4, part 10. Coordinates, on issues within its competence, the implementation of measures by executive authorities and, in cases provided for by law, by local self-government bodies on issues of:</p> <p>Ensuring the rights and <i>freedoms</i> of veterans, members of their families and internally displaced persons from the temporarily occupied territories of Ukraine;</p> <p>Social protection of veterans and members of their families;</p> <p>Honouring the memory of veterans; developing interaction and cooperation with civil society institutions.</p>	<p>Clause 4, part 10. Coordinates, on issues within its competence, the implementation of measures by executive authorities and, in cases provided for by law, by local self-government bodies on issues of:</p> <p>Ensuring the rights and freedoms of veterans and members of their families;</p> <p>Social protection of veterans and members of their families;</p> <p>Honouring the memory of veterans; developing interaction and cooperation with civil society institutions.</p>
<p>Responsibilities: monitoring</p>	<p>Clause 4, part 4. Collects analyses information on:</p> <p>The housing needs of war veterans and participants of the anti-terrorist operation, submits proposals to the Minister of Social Policy on ways to solve the housing problems of this category of persons.</p> <p>Clause 4, part 3. Collects and analyses information on the need to provide war veterans with sanatorium and resort treatment, as well as technical and other rehabilitation facilities for participants of the anti-terrorist operation, submits proposals to the Minister of Social Policy for their distribution among the regions for further provision, monitors and controls their implementation.</p>	<p>Clause 4, part 9. Conducts monitoring of:</p> <p>The state of compliance with the requirements of the legislation on social protection of veterans and members of their families, including the provision of housing for veterans and their families.</p> <p>The state of compliance with the requirements of the legislation on the provision of medical services to veterans.</p> <p>The state of compliance with the requirements of the legislation on psychological rehabilitation and social adaptation of veterans and members of their families, employment and leisure of veterans, restoration and</p>	<p>Clause 4, part 14. Conducts monitoring of:</p> <p>The state of compliance with the requirements of the legislation on social protection of veterans and members of their families, including the provision of housing for veterans and their families.</p> <p>The state of compliance with the requirements of the legislation on the provision of medical services to veterans.</p> <p>The state of compliance with the requirements of the legislation on psychological rehabilitation and social adaptation of veterans and members of their families, employment and leisure of veterans, restoration and improvement of their</p>	<p>Clause 4, part 13. Conducts monitoring of:</p> <p>The state of compliance with the requirements of the legislation on social protection of veterans and members of their families, including the provision of housing for veterans and their families.</p> <p>The state of compliance with the requirements of the legislation on the provision of medical services to veterans and the provision of technical and other means of rehabilitation.</p> <p>The state of compliance with the requirements of the legislation on psychological rehabilitation and social adaptation of veterans and members of their families,</p>

	<p>Clause 4, part 6. Collects and analyses information on the need for psychological rehabilitation of war veterans and participants of the anti-terrorist operation, organises its preparation and conduct;</p>	<p>improvement of their professional skills and abilities through vocational training, and increasing competitiveness in the labour market;</p> <p>The state of compliance with the requirements of the legislation on the protection of the rights and interests of veterans and members of their families.</p>	<p>professional skills and abilities through vocational training, and increasing competitiveness in the labour market;</p> <p>The state of compliance with the requirements of the legislation on the protection of the rights and freedoms of veterans, members of their families, human and civil rights and freedoms in the temporarily occupied territories of Ukraine;</p> <p>The compliance with international humanitarian law and takes measures to respond to violations;</p> <p>The activities of international humanitarian organisations on issues within the competence of the Ministry of Veterans;</p> <p>The impact of the armed conflict and the temporary occupation of part of the territory of Ukraine on the socio-economic development of the state and certain sectors of the economy.</p>	<p>employment and leisure of veterans, restoration and improvement of their professional skills and abilities through vocational training, and increasing competitiveness in the labour market,</p> <p>The state of compliance with the requirements of the legislation on the protection of the rights and freedoms of veterans and their families.</p>
<p>Powers: granting statuses</p>	<p>Clause 4, part 9. Organises and coordinates work regarding:</p> <p>Granting combatant status, including holding meetings of the interdepartmental commission for reviewing materials on recognition as combatants and payment of one-time financial assistance in the event of death or disability of a volunteer and certain other categories of persons in accordance with the Law of Ukraine "On the Status of War Veterans and Guarantees of Their Social Protection".</p>	<p>Clause 4, part 10. Organises and coordinates work on the following issues:</p> <p>Granting, withdrawal of combatant status and granting a one-time financial assistance in case of death or disability of a volunteer and certain other categories of persons in accordance with the Law of Ukraine "On the Status of War Veterans and Guarantees of Their Social Protection";</p> <p>Establishing the fact of injuries or other health damage caused by explosives, ammunition and</p>	<p>Clause 4, part 15. Organises and coordinates work on the following issues:</p> <p>Granting, withdrawal of combatant status and granting a one-time financial assistance in case of death or disability of a volunteer and certain other categories of persons in accordance with the Law of Ukraine "On the Status of War Veterans and Guarantees of Their Social Protection";</p> <p>Establishing the fact of injuries or other health damage caused by explosives, ammunition and military</p>	<p>Clause 4, part 14. Organises and coordinates work on the following issues:</p> <p>Granting, withdrawal of combatant status and granting a one-time financial assistance in case of death or disability of a volunteer and certain other categories of persons in accordance with the Law of Ukraine "On the Status of War Veterans and Guarantees of Their Social Protection";</p> <p>Establishing the fact of injuries or other health damage caused by explosives, ammunition and</p>

		military weapons on the territory of the anti-terrorist operation, taking measures to ensure national security and defence, repelling and deterring the armed aggression of the Russian Federation in Donetsk and Luhansk regions.	weapons on the territory of the anti-terrorist operation, taking measures to ensure national security and defence, repelling and deterring the armed aggression of the Russian Federation in Donetsk and Luhansk regions.	emilitary weapons on the territory of the anti-terrorist operation, taking measures to ensure national security and defence, repelling and deterring the armed aggression of the Russian Federation in Donetsk and Luhansk regions.
Responsibilities: provision of housing	Clause 4, part 5. Organises and coordinates the work on provision of housing for combatants who became disabled while participating in the anti-terrorist operation.	-	-	-
Responsibilities: collecting information on recovery measures	-	-	Clause 4, part 35. Collects and analyses information on the need to take measures to restore infrastructure (transport, energy, housing and communal, social, etc.) in the territories that have been negatively affected by the armed conflict or temporary occupation;	-
Responsibilities: international cooperation	Clause 4, part 7. Participates in international cooperation, drafting international treaties of Ukraine on issues within its competence, prepares proposals for the conclusion and denunciation of such treaties, and organises, within its powers, the implementation of international treaties.	Clause 4, part 28. Carries out international cooperation, participates in the preparation of international treaties of Ukraine, prepares proposals for the conclusion and denunciation of such treaties, within the powers provided by law, concludes international treaties of Ukraine and ensures the fulfilment of Ukraine's obligations under international treaties on issues within the competence of the Ministry of Veterans. Clause 4, part 30. Initiates, prepares and implements projects (programmes) of international technical and financial assistance, including with the participation of governments, international organisations and foreign public	Clause 4, part 51. Carries out international cooperation, participates in the preparation of international treaties of Ukraine, prepares proposals for the conclusion and denunciation of such treaties, within the powers provided by law, concludes international treaties of Ukraine and ensures the fulfilment of Ukraine's obligations under international treaties on issues within the competence of the Ministry of Veterans. Clause 4, part 53. Initiates, prepares and implements projects (programmes) of international technical and financial assistance, including with the participation of governments, international organisations and foreign public	Clause 4, part 31. Carries out international cooperation, participates in the preparation of international treaties of Ukraine, prepares proposals for the conclusion and denunciation of such treaties, within the powers provided by law, concludes international treaties of Ukraine and ensures the fulfilment of Ukraine's obligations under international treaties on issues within the competence of the Ministry of Veterans. Clause 4, part 33. Initiates, prepares and implements projects (programmes) of international technical and financial assistance, including with the participation of governments, international

		associations, and other subjects of public and private law, within the powers provided for by law.	associations, and other subjects of public and private law, within the powers provided for by law.	organisations and foreign public associations, and other subjects of public and private law, within the powers provided for by law.
Responsibilities: coordination of other government agencies in the implementation of international projects	Clause 4, part 8. Ensures coordination of the activities of central and local executive authorities, local self-government bodies, enterprises, institutions and organisations in the implementation of international projects and programmes within their competence.	Clause 4, part 29. Ensures coordination of the activities of central and local executive authorities, local self-government bodies, enterprises, institutions and organisations in the implementation of international projects and programmes within their powers provided by law.	Clause 4, part 52. Ensures coordination of the activities of central and local executive authorities, local self-government bodies, enterprises, institutions and organisations in the implementation of international projects and programmes within the powers provided by law.	Clause 4, part 32. Ensures coordination of the activities of central and local executive authorities, local self-government bodies, enterprises, institutions and organisations in the implementation of international projects and programmes within their powers provided by law.
Powers: holding public holidays, etc.	Clause 4, part 13. Organises the preparation and holding of state holidays, commemorations of anniversaries and memorial dates, international days at the state level related to war veterans. Clause 4, part 14 ¹ . In accordance with the action plan agreed with the Ministry of Social Policy, holds events to mark holidays, memorial and historical dates established by acts of the President of Ukraine or the Verkhovna Rada of Ukraine and related to the honouring of war veterans, the defence of independence, sovereignty and territorial integrity of Ukraine, as well as the formation of unity and statehood, the proclamation of independence of Ukraine, at the expense of funds provided for in the state budget by the relevant budget programme.	Clause 4, part 16. Plans and organises, within its competence, the marking of jubilee, commemorative and historical dates, international days at the state level related to the honouring of veterans, the defence of Ukraine's independence, sovereignty and territorial integrity, as well as the formation of unity and statehood, and the proclamation of Ukraine's independence.	Clause 4, part 21. Plans and organises, within its competence, the marking of jubilee, commemorative and historical dates, international days at the state level related to the honouring of veterans, the defence of Ukraine's independence, sovereignty and territorial integrity, as well as the formation of unity and statehood, and the proclamation of Ukraine's independence.	Clause 4, part 20. Plans and organises, within its competence, the marking of jubilee, commemorative and historical dates, international days at the state level related to the honouring of veterans, the defence of the independence, sovereignty and territorial integrity of Ukraine, as well as the formation of unity and statehood, and the proclamation of Ukraine's independence.
Powers: distribution of public funds	Clause 5, part 4. Carries out, within its authority, control over the use of state funds allocated for the implementation of projects and programmes, including international ones;	Clause 11, part 11. Makes decisions on the allocation of budgetary funds, the main administrator of which is the Ministry of Veterans.	Clause 12, part 11. Makes decisions on the allocation of budgetary funds, the main administrator of which is the Ministry of Veterans.	Clause 12, part 11. Makes decisions on the allocation of budgetary funds, the main administrator of which is the Ministry of Veterans.

	Clause 4, part 23. Submits proposals to the Ministry of Social Policy on the allocation of funds provided for in the state budget by the areas of activity of the Service.			
Powers: informing about the need for certificates	Clause 4, part 10. Submits to the Minister of Social Policy generalised information on the need for certificates for war veterans, organises their order in accordance with the law.	-	-	-
Responsibilities: cooperation with public associations	<p>Пункт 4, частина 11. бере Clause 4, part 11. Participates, within the limits of the powers provided for by law, together with all-Ukrainian public associations of war veterans and former service members in monitoring the implementation of the state policy in the field of their social protection.</p> <p>Clause 4, part 14. Cooperates with all-Ukrainian public associations of war veterans and participants of the anti-terrorist operation, provides financial support to all-Ukrainian public associations of war veterans, victims of Nazi persecution and victims of political repression in accordance with the procedure established by law, monitors activities carried out at the expense of the state budget by all-Ukrainian public associations of war veterans, victims of Nazi persecution and victims of political repression, analyses the effectiveness of such activities.</p>	<p>Пункт 4, частина 12. співпрацює зClause 4, part 12. Cooperates with public associations to identify and implement priority areas of state policy on issues within the competence of the Ministry of Veterans, provides financial support to public associations of veterans on a competitive basis in accordance with the procedure established by law for the implementation of programmes (projects, activities) in accordance with the identified priority areas, monitors and analyses the effectiveness of programmes (projects, activities) implemented at the expense of the state budget by public associations of veterans</p> <p>Clause 4, part 13. Initiates and ensures dialogue with the veteran community.</p>	<p>Clause 4, part 17. Cooperates with public associations to identify and implement priority areas of state policy on issues within the competence of the Ministry of Veterans, provides financial support to public veterans' associations on a competitive basis for the implementation of programmes (projects, activities) in accordance with the procedure established by law, monitors and analyses the effectiveness of programmes (projects, activities) implemented at the expense of the state budget by public associations of veterans;</p> <p>Clause 4, part 18. Initiates and ensures dialogue with public associations of veterans, members of their families and internally displaced persons.</p>	<p>Clause 4, part 16. Cooperates with public associations to identify and implement priority areas of state policy on issues within the competence of the Ministry of Veterans, provides financial support to public veterans' associations on a competitive basis for the implementation of programmes (projects, activities) in accordance with the procedure established by law, monitors and analyses the effectiveness of programmes (projects, activities) implemented at the expense of the state budget by public associations of veterans;</p> <p>Clause 4, part 17. initiates and ensures a dialogue with public associations of veterans and members of their families.</p>

Powers: return of prisoners of war	Clause 4, part 12. Takes measures to return prisoners of war to their homeland, search for those who went missing during wars and local conflicts, perform military service duties, and participate in resolving issues related to psychological rehabilitation , social and professional adaptation of former prisoners of war who returned to their homeland and participants of the anti-terrorist operation.	Clause 4, part 19. Promotes the implementation of measures for the release of prisoners of war and hostages , search for missing persons in connection with wars and local conflicts, fulfilment of military service duties, participates in resolving issues of social and professional adaptation of former prisoners of war who have returned to their homeland.	Clause 4, part 9. Promotes the implementation of measures for the release of prisoners of war and hostages, search for missing persons in connection with wars and local conflicts, fulfilment of military service duties, participates in resolving issues of social and professional adaptation of former prisoners of war who have returned to their homeland.	Clause 4, part 9. Promotes the implementation of measures for the release of prisoners of war and hostages, search for missing persons in connection with wars and local conflicts, fulfilment of military service duties, participates in resolving issues of social and professional adaptation of former prisoners of war who have returned to their homeland.
Powers regarding the number of veterans entitled to payment by 5 May	Clause 4, part 15. Collects information on the number of war veterans entitled to receive annual one-off financial assistance by 5 May, calculates the need for funds and monitors the payment of this assistance.	Clause 3, part 1. Formation and implementation of state policy in the field of: Annual payment of one-time financial assistance by 5 May (except for the organisation of payment of such assistance).	Clause 3, part 1. Formation and implementation of state policy in the field of: Annual payment of one-time financial assistance by 5 May (except for the organisation of payment of such assistance).	Пункт 3, частина 1. формування і Clause 3, part 1. Formation and implementation of state policy in the field of: Annual payment of one-time financial assistance by 5 May (except for the organisation of payment of such assistance).
Powers: informing about activities	Clause 4, part 16. Promotes coverage of the state of implementation of legislative acts on the implementation of state policy in the field of: Social protection of war veterans and participants of the anti-terrorist operation; Social and professional adaptation of discharged military personnel, persons discharged from military service and participants of the anti-terrorist operation.	Clause 5, part 5. Ensures coverage of information on the activities of the Ministry of Veterans and territorial bodies in the media and on its official website.	Clause 5, part 5. Ensures coverage of information on the activities of the Ministry of Veterans and territorial bodies in the media and on its official website.	Clause 5, part 5. Ensures coverage of information on the activities of the Ministry of Veterans and territorial bodies in the media and on its official website;
Powers: organisation of burials	Clause 4, part 17. Participates in the organisation of burials of persons who died during direct participation in the anti-terrorist operation, wars on the territory of Ukraine and other states, including	Clause 4, part 14. Plans and organises the implementation of measures to honour the memory of veterans (search, burial and reburial, preservation and arrangement of military graves, perpetuation of	Clause 4, part 19. Plans and organises the implementation of measures to honour the memory of veterans (search, burial and reburial, preservation and arrangement of military graves, perpetuation of	Clause 4, part 18. Plans and organises the implementation of measures to honour the memory of veterans (search, burial and reburial, preservation and arrangement of military graves,

	<p>the payment of material assistance; visits to burial sites by delegations consisting of war veterans and participants of the anti-terrorist operation and their close relatives.</p> <p>Clause 4, part 18. ensures the interaction of state authorities, public associations, enterprises on the search, arrangement and preservation of military graves and the identification of unknown soldiers who died during the anti-terrorist operation and wars on the territory of Ukraine and other states.</p>	<p>memory, etc.), coordinates the activities of executive authorities and local self-government bodies to honour the memory of veterans.</p> <p>Clause 4, part 15. participates in the organisation of burials and reburials of persons who died as a result of direct participation in combat operations while defending the Motherland or performing military service on the territory of Ukraine and other states.</p> <p>Clause 4, part 17. Ensures the interaction of state authorities, local self-government bodies, enterprises, institutions and organisations on the search, record-keeping, arrangement and preservation of military graves and the identification of unknown soldiers who died while participating in hostilities on the territory of Ukraine and other states.</p> <p>Clause 4, part 18. Creates and maintains a register of military burials, monuments and memorial plaques of deceased veterans.</p>	<p>memory, etc.), coordinates the activities of executive authorities and local self-government bodies to honour the memory of veterans.</p> <p>Clause 4, part 20. participates in the organisation of burials and reburials of persons who died as a result of direct participation in combat operations while defending the Motherland or performing military service on the territory of Ukraine and other states.</p> <p>Clause 4, part 22. Ensures the interaction of state authorities, local self-government bodies, enterprises, institutions and organisations on the search, record-keeping, arrangement and preservation of military graves and the identification of unknown soldiers who died while participating in hostilities on the territory of Ukraine and other states.</p> <p>Clause 4, part 23. creates and maintains a register of military graves, monuments and memorial plaques of deceased veterans.</p>	<p>perpetuation of memory, etc.), coordinates the activities of executive authorities and local self-government bodies to honour the memory of veterans.</p> <p>Clause 4, part 19. participates in the organisation of burials and reburials of persons who died as a result of direct participation in combat operations while defending the Motherland or performing military service on the territory of Ukraine and other states.</p> <p>Clause 4, part 21. Ensures the interaction of state authorities, local self-government bodies, enterprises, institutions and organisations on the search, record-keeping, arrangement and preservation of military graves and the identification of unknown soldiers who died while participating in hostilities on the territory of Ukraine and other states.</p>
Responsibilities: book publishing	<p>Clause 4, part 19. Participates in organising the publication of books related to the perpetuation of the memory of participants in the anti-terrorist operation, defenders of the Motherland and victims of wars, memoirs, artistic and audiovisual works, the creation of museums, memorials and expositions, and conducting scientific research on relevant issues.</p>	<p>Clause 4, part 20. Participates in organising the publication of books, other printed materials related to the perpetuation of the memory of defenders of the Motherland, participants in the struggle for independence of Ukraine in the XX century, memoirs, artistic and audiovisual works, in the creation of museums, memorials and exhibitions, conducting scientific research and conferences, seminars,</p>	<p>Clause 4, part 24. Participates in organising the publication of books and other printed materials related to the perpetuation of the memory of defenders of the Motherland, participants in the struggle for independence of Ukraine in the XX century, memoirs, artistic and audiovisual works, in the creation of museums, memorials and exhibitions, conducting scientific research and conferences, seminars,</p>	<p>Clause 4, part 22. Participates in organising the publication of books, other printed publications related to the perpetuation of the memory of defenders of the Motherland, participants in the struggle for independence of Ukraine in the XX century, memoirs, artistic and audiovisual works, in the creation of museums, memorials and exhibitions, conducting scientific</p>

		roundtable meetings and other events within its competence.	roundtable meetings and other events within its competence.	research and conferences, seminars, roundtable meetings and other events within its competence.
Powers: clarification of state policy	<p>Clause 4, part 20. Provides clarification on the issues of:</p> <p>Social protection and provision of benefits to war veterans and participants of the anti-terrorist operation;</p> <p>Social and professional adaptation of discharged military personnel, persons discharged from military service and participants of the anti-terrorist operation.</p>	<p>Clause 4, part 32. Informs and provides clarification on the implementation of state policy on issues within the competence of the Ministry of Veterans.</p>	<p>Clause 4, part 55. informs and provides clarification on the implementation of state policy on issues within the competence of the Ministry of Veterans.</p> <p>Clause 4, part 13. Organises and conducts explanatory work on the need to comply with international humanitarian law.</p>	<p>Clause 4, part 35. informs and provides clarification on the implementation of state policy on issues within the competence of the Ministry of Veterans.</p>
Responsibilities: management of state-owned property	<p>Clause 4, part 21. Manages state-owned property that falls under the jurisdiction of the Service.</p>	<p>Clause 4, part 34. Performs functions related to the management of state-owned property that falls under its jurisdiction.</p>	<p>Clause 4, part 57. Performs functions related to the management of state-owned property that falls under its jurisdiction.</p>	<p>Clause 4, part 37. Performs functions related to the management of state-owned property that falls under its jurisdiction.</p>
Responsibilities: collecting information on the needs of veterans	<p>Clause 4, part 22. Collects information on the social and domestic needs of war veterans and participants of the anti-terrorist operation and submits proposals to the Minister of Social Policy to meet them.</p>	<p>Clause 4, part 26. Creates and ensures the functioning of a veteran's personal electronic cabinet.</p> <p>Clause 4, part 25. Creates and ensures the functioning of an information and analytical accounting system for the administration of veterans' needs, creates and maintains a centralised database (register) of veterans and ensures the protection of personal data obtained in accordance with the law, protection of restricted information, as well as technical protection of information and controls their safety, ensures and coordinates the exchange of data between existing state registers,</p>	<p>Clause 4, part 28. Creates and ensures the functioning of an information and analytical accounting system for administering the needs of veterans (personal electronic cabinet of a veteran).</p>	<p>Clause 4, part 26. Creates and ensures the functioning of an information and analytical accounting system for administering the needs of veterans (personal electronic cabinet of a veteran).</p>

		information and analytical systems, as well as between providers of benefits and services.		
Powers: citizens' appeals	Clause 4, part 24. considers citizens' appeals on issues related to the activities of the Service, enterprises, institutions and organisations within its management;	Clause 4, part 33. considers citizens' appeals on issues related to the activities of the Ministry of Veterans, enterprises, institutions and organisations under its management, as well as on acts issued by it;	Clause 4, part 56. considers citizens' appeals on issues related to the activities of the Ministry of Veterans, its territorial bodies , enterprises, institutions and organisations within its management, as well as on acts issued by it;	Clause 4, part 36. considers citizens' appeals on issues related to the activities of the Ministry of Veterans, its territorial bodies, enterprises, institutions and organisations within its management, as well as on acts issued by it;
Powers: control over territorial bodies	Clause 4, part 24 ¹ . Controls and coordinates the activities of the territorial bodies of the Service.	Clause 5, part 3. Exercises oversight over the activities of the territorial bodies of the Ministry of Veterans, as well as enterprises, institutions and organisations within its jurisdiction.	Clause 5, part 3. Exercises oversight over the activities of enterprises, institutions and organisations under the jurisdiction of the Ministry of Veterans.	Clause 5, part 3. Exercises oversight over the activities of enterprises, institutions and organisations under the jurisdiction of the Ministry of Veterans.
Powers: preparation of regulations	-	<p>Clause 4, part 2. Develops draft laws and other regulatory acts on issues within its competence.</p> <p>Clause 4, part 3. approves draft laws and other draft legislative acts submitted for approval by other ministries and central executive authorities, prepares, within the powers provided by law, conclusions and proposals on draft laws and other legislative acts submitted to the Cabinet of Ministers of Ukraine and draft laws submitted to the Verkhovna Rada of Ukraine by other subjects of legislative initiative, normative legal acts of the Verkhovna Rada of the Autonomous Republic of Crimea.</p> <p>Clause 4, part 4. Prepares, within the powers provided for by law, comments and proposals to the laws adopted by the Verkhovna Rada of Ukraine and submitted to the President of Ukraine for signature.</p>	<p>Clause 4, part 2. Develops draft laws and other regulatory acts on issues within its competence.</p> <p>Clause 4, part 3. approves draft laws and other draft legislative acts submitted for approval by other ministries and central executive authorities, prepares, within the powers provided by law, conclusions and proposals on draft laws and other legislative acts submitted to the Cabinet of Ministers of Ukraine and draft laws submitted to the Verkhovna Rada of Ukraine by other subjects of legislative initiative, normative legal acts of the Verkhovna Rada of the Autonomous Republic of Crimea.</p> <p>Clause 4, part 4. Prepares, within the powers provided for by law, comments and proposals to the laws adopted by the Verkhovna Rada of Ukraine and submitted to the President of Ukraine for signature.</p>	<p>Clause 4, part 2. Develops draft laws and other regulatory acts on issues within its competence.</p> <p>Clause 4, part 3. approves draft laws and other draft legislative acts submitted for approval by other ministries and central executive authorities, prepares, within the powers provided by law, conclusions and proposals on draft laws and other legislative acts submitted to the Cabinet of Ministers of Ukraine and draft laws submitted to the Verkhovna Rada of Ukraine by other subjects of legislative initiative, normative legal acts of the Verkhovna Rada of the Autonomous Republic of Crimea.</p> <p>Clause 4, part 4. Prepares, within the powers provided for by law, comments and proposals to laws adopted by the Verkhovna Rada of Ukraine and submitted to the</p>

		<p>Clause 4, part 5. Provides methodological support within the powers provided for by law in the development, monitoring and performance evaluation of the implementation of strategic planning documents (socio-economic development programmes, targeted programmes, etc.) of local state administrations and local self-government bodies on issues within the competence of the Ministry of Veterans.</p> <p>Clause 4, part 6. Participates in the analysis of draft state target programmes to establish their impact on the rights and interests of veterans and their families.</p> <p>Clause 4, part 7. Participates in the preparation of a generalised conclusion on the results of the implementation of state target programmes in terms of assessing the consequences of their implementation in terms of ensuring the rights and interests of veterans and members of their families.</p>	<p>Clause 4, part 5. Provides methodological support within the powers provided for by law in the development, monitoring and performance evaluation of the implementation of strategic planning documents (socio-economic development programmes, targeted programmes, etc.) of local state administrations and local self-government bodies on issues within the competence of the Ministry of Veterans.</p> <p>Clause 4, part 6. As a state customer, carries out general management and control over the development of state target programmes and the implementation of measures and tasks specified therein.</p> <p>Clause 4, part 7. Participates in the analysis of draft state target programmes to establish their impact on the rights and freedoms of veterans, their families and internally displaced persons from the temporarily occupied territories of Ukraine.</p> <p>Clause 4, part 8. Participates in the preparation of a generalised conclusion on the results of the implementation of state target programmes in terms of assessing the consequences of their implementation in terms of ensuring the rights and freedoms of veterans, members of their families and internally displaced persons from the temporarily occupied territories of Ukraine.</p>	<p>President of Ukraine for signature.</p> <p>Clause 4, part 5. Provides methodological support within the powers provided for by law in the development, monitoring and performance evaluation of the implementation of strategic planning documents (socio-economic development programmes, targeted programmes, etc.) of local state administrations and local self-government bodies on issues within the competence of the Ministry of Veterans.</p> <p>Clause 4, part 6. As a state customer, carries out general management and control over the development of state target programmes and the implementation of measures and tasks specified therein.</p> <p>Clause 4, part 7. participates in the analysis of draft state target programmes to establish their impact on the rights and freedoms of veterans and their families.</p> <p>Clause 4, part 8. Participates in the preparation of a generalised conclusion on the results of the implementation of state target programmes in terms of assessing the consequences of their implementation in terms of ensuring the rights and freedoms of veterans and members of their families.</p>
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Responsibilities: coordination of activities	-	<p>Clause 4, part 8. Coordinates, on issues within its competence, the implementation of measures by executive authorities and, in cases provided for by law, by local self-government bodies on the following issues:</p> <p>Ensuring the rights and interests of veterans and members of their families;</p> <p>Social protection of veterans and their families;</p> <p>Honouring the memory of veterans;</p> <p>Developing interaction and cooperation with civil society institutions;</p> <p>Promoting and ensuring the formation of a positive image of veterans.</p>	<p>Clause 4, part 10. Coordinates, on issues within its competence, the implementation of measures by executive authorities and, in cases provided for by law, by local self-government bodies on the following issues:</p> <p>Ensuring the rights and freedoms of veterans, members of their families and internally displaced persons from the temporarily occupied territories of Ukraine;</p> <p>Social protection of veterans and their families;</p> <p>Honouring the memory of veterans;</p> <p>Developing interaction and cooperation with civil society institutions.</p>	<p>Clause 4, part 10. Coordinates, on issues within its competence, the implementation of measures by executive authorities and, in cases provided for by law, by local self-government bodies on the following issues:</p> <p>Ensuring the rights and freedoms of veterans and members of their families;</p> <p>Social protection of veterans and their families;</p> <p>Honouring the memory of veterans;</p> <p>Developing interaction and cooperation with civil society institutions.</p>
Powers: should contribute to	-	<p>Clause 4, part 23. Facilitates the involvement of veterans in the national-patriotic (including military-patriotic) education of children and youth.</p> <p>Clause 4, part 24. Promotes the development of sports leisure of veterans, their participation in international and other events, develops programmes of sports rehabilitation and sports for veterans.</p>	<p>Clause 4, part 9. Facilitates:</p> <p>The involvement of veterans in the national-patriotic (including military-patriotic) education of children and youth;</p> <p>The development of physical culture and sports among veterans and their families, their participation in international and other events, ensures training of the national team of Ukraine from among veterans and its participation in international sports competitions, develops sports rehabilitation and sports programmes for veterans and their families;</p>	<p>Clause 4, part 9. Facilitates:</p> <p>The involvement of veterans in the national-patriotic (including military-patriotic) education of children and youth;</p> <p>The development of physical culture and sports among veterans and their families, their participation in international and other events, ensures training of the national team of Ukraine from among veterans and its participation in international sports competitions, develops sports rehabilitation and sports programmes for veterans and their families;</p>

			<p>The promotion and ensuring the formation of a positive image of veterans;</p> <p>Implementation of the rights and freedoms of Ukrainian citizens living in the temporarily occupied territories of Ukraine;</p> <p>Meeting the national, cultural and educational needs and developing the ethnic identity of indigenous peoples and national minorities living in the temporarily occupied territory of the Autonomous Republic of Crimea and the city of Sevastopol;</p> <p>Free development of the Crimean Tatar language, languages of other indigenous peoples and national minorities living in the temporarily occupied territory of the Autonomous Republic of Crimea and the city of Sevastopol;</p> <p>Meeting the socio-economic, environmental and cultural needs of the population living in the temporarily occupied territories of Ukraine;</p> <p>The provision of social security for internally displaced persons, social rehabilitation of persons deprived of their personal freedom as a result of the actions of illegal armed groups, the occupation administration and/ or the authorities of the Russian Federation in the temporarily occupied territories of Ukraine, in accordance with the procedure established by law;</p>	<p>The preservation of mental health of veterans and their families;</p> <p>The realisation of the right of veterans and their families to receive medical assistance;</p> <p>Professional orientation of veterans and their families;</p> <p>The access of veterans and their family members to pre-school, complete secondary education, vocational education, professional pre-university and higher education, in cooperation with the Ministry of Education and Science and local self-government bodies;</p> <p>The promotion and ensuring the formation of a positive image of veterans;</p>
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			<p>The provision of internally displaced persons with pre-school, complete secondary education, vocational education and higher education, jointly with the Ministry of Education and Science and local governments;</p> <p>Attracting funds from international organisations, non-governmental organisations of foreign countries, international non-governmental organisations in accordance with the established procedure to implement programmes aimed at ensuring the protection of the rights and freedoms of persons violated as a result of the armed conflict and/or temporary occupation of part of the territory of Ukraine;</p> <p>The provision of international humanitarian organisations with access to the population living in the temporarily occupied territories of Ukraine;</p> <p>protection of the rights of internally displaced persons and persons residing in the temporarily occupied territories of Ukraine in international courts;</p> <p>Implementation of measures aimed at developing the ethnic identity and culture of indigenous peoples and national minorities living in the temporarily occupied territory of the Autonomous Republic of Crimea and the city of Sevastopol.</p>	
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<p>Credentials: confirmation of participation in the political struggle;</p> <p>Responsibilities: measures to create a positive image of veterans</p>	<p>-</p>	<p>Clause 4, part 11. Considers materials confirming the participation of individuals in the underground and partisan liberation struggle in Ukraine in the twentieth century.</p> <p>Clause 4, part 21. Organises the implementation of measures to form a positive image of veterans, popularise military history, establish communication between veterans of different generations, coordinate the activities of executive authorities and local self-government bodies on relevant issues.</p>	<p>Clause 4, part 16. Considers materials confirming the participation of individuals in the underground and partisan liberation struggle in Ukraine in the twentieth century.</p> <p>Clause 4, part 25. Organises the implementation of measures to form a positive image of veterans, popularise military history, establish communication between veterans of different generations, coordinate the activities of executive authorities and local self-government bodies on relevant issues.</p>	<p>Clause 4, part 15. Considers materials confirming the participation of individuals in the underground and partisan liberation struggle in Ukraine in the twentieth century.</p> <p>Clause 4, part 23. Organises the implementation of measures to form a positive image of veterans, popularise military history, establish communication between veterans of different generations, coordinate the activities of executive authorities and local self-government bodies on relevant issues.</p>
<p>Credentials: award proposals</p>	<p>-</p>	<p>Clause 4, part 22. Submits proposals in accordance with the established procedure for awarding veterans with state awards.</p>	<p>Clause 4, part 26. Submits proposals in accordance with the established procedure for awarding veterans with state awards.</p>	<p>Clause 4, part 24. Submits proposals in accordance with the established procedure for awarding veterans with state awards.</p>
<p>Responsibilities: attracting</p>	<p>-</p>	<p>-</p>	<p>Clause 4, part 32. Takes measures and organises work to attract investments, loans and grants, including funds from international financial organisations and international technical assistance, in order to prepare and perform tasks set by the Ministry of Veterans and implement projects on issues within the competence of the Ministry of Veterans.</p>	<p>Пункт 4, частина 37. вживає Clause 4, part 37. Takes measures and organises work to attract investments, loans and grants, including funds from international financial organisations and international technical assistance, in order to prepare and perform tasks set by the Ministry of Veterans and implement projects on issues within the competence of the Ministry of Veterans.</p>
<p>Responsibilities: ordering research and development work</p>	<p>-</p>	<p>Clause 4, part 27. Acts as a customer of research and development works in accordance with the established procedure, within the powers provided by law, promotes the creation and implementation of modern information technologies in the field of competence of the Ministry of Veterans.</p>	<p>Clause 4, part 50. Acts as a customer of research and development works in accordance with the established procedure, within the powers provided by law, promotes the creation and implementation of modern information technologies in the field of competence of the Ministry of Veterans.</p>	<p>Clause 4, part 30. Acts as a customer of research and development works in accordance with the established procedure, within the powers provided by law, promotes the creation and implementation of modern information technologies in the field of competence of the Ministry of Veterans.</p>

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Powers: adaptation of legislation to EU legislation	-	Clause 4, part 31. Participates, within the powers provided for by law, in the implementation of measures for the adaptation of legislation to EU legislation.	Clause 4, part 54. Participates, within the powers provided for by law, in the implementation of measures for the adaptation of legislation to EU legislation.	Clause 4, part 34. Participates, within the powers provided for by law, in the implementation of measures for the adaptation of legislation to EU legislation.
Powers: list of medical services for veterans	-	-	Clause 4, part 11. In agreement with the Ministry of Health, develops a list of medical services for veterans and members of their families not included in the programme of state guarantees of medical care for the population, the payment for which is guaranteed by the state;	Clause 4, part 12. In agreement with the Ministry of Health, develops a list of medical services for veterans and members of their families not included in the programme of state guarantees of medical care for the population, the payment for which is guaranteed by the state;
Responsibilities: interaction with international humanitarian organisations	-	-	Clause 4, part 12. Interacts with international humanitarian organisations to provide humanitarian assistance to civilians during armed conflicts.	-
Responsibilities: outreach work	-	-	Clause 4, part 13. Organises and conducts explanatory work on the need to comply with international humanitarian law.	-
Responsibilities: ensuring the fulfilment of international obligations	-	-	Clause 4, part 29. Ensures that the executive authorities fulfil Ukraine's international obligations to implement the Geneva Conventions of 12 August 1949 relative to the Protection of War Victims and other international humanitarian law and participates in coordination mechanisms for their implementation.	-
Mandate: peacebuilding activities	-	-	Clause 4, part 30. Coordinates the implementation of peacebuilding measures aimed at reducing the risk of armed conflict by increasing national capacity to resolve armed conflicts, as well as identifying the basis for peace and development, strengthening the resilience of host	-

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			communities, reintegration/ integration of combatants and internally displaced persons, and their professional and social adaptation.	
Responsibilities: strategic planning	-	-	Clause 4, part 31. Participates in strategic planning for economic recovery and peacebuilding in the territories adversely affected by the armed conflict and/or temporary occupation.	-
Responsibilities: monitoring of recovery	-	-	Clause 4, part 32. Monitors and evaluates the effectiveness of measures to restore and build peace in the territories negatively affected by the armed conflict and/or temporary occupation.	-
Responsibilities: preparation of a proposal for the supply of goods	-	-	Clause 4, part 34. Prepares proposals for the supply of goods recognised as humanitarian aid, goods and services, including water, gas and electricity supply to the temporarily occupied territories of Ukraine.	-
Powers: analysis of information on the required recovery	-	-	Clause 4, part 35. Collects and analyses information on the need to take measures to restore infrastructure (transport, energy, housing and communal, social, etc.) in the territories that have been negatively affected by the armed conflict or temporary occupation.	-
Powers: priority recovery proposals	-	-	Clause 4, part 36. Develops proposals for identifying infrastructure facilities that require priority restoration.	-
Mandate: cooperation in the protection of civilians	-	-	Clause 4, part 37. Interacts with the Ministry of Defence, the Security Service of Ukraine, the Ministry of Internal Affairs, the State Special Communications Service, the	-

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			National Guard, the State Border Guard Service, the State Protection Service, the National Police, the State Emergency Service, intelligence and law enforcement agencies, military formations established in accordance with the laws of Ukraine to protect civilians living along the contact line and in the temporarily occupied territories of Ukraine.	
Responsibilities: collecting information on the needs of IDPs	-	-	Clause 4, part 38. Collects and analyses information on the need to provide housing and other social protection issues for internally displaced persons.	-
Responsibilities: implementation of measures to implement development programmes	-	-	Clause 4, part 39. Carries out measures and tasks aimed at implementing state and regional programmes of socio-economic and cultural development, protection of constitutional rights and freedoms of Ukrainian citizens who were forced to leave the temporarily occupied territories of Ukraine.	-
Responsibilities: interaction with representative bodies of the Crimean Tatar people and NGOs	-	-	Clause 4, part 40. Interacts with the authorised representative bodies of the Crimean Tatar people, non-governmental organisations of foreign states representing the interests of the Crimean Tatars, international non-governmental organisations, and the media.	-
Powers: measures to protect human rights and freedoms			Clause 4, part 41. Takes measures to protect the rights and freedoms of persons violated as a result of the armed conflict and/or temporary occupation of part of the territory of Ukraine.	

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Powers: measures to protect the rights and freedoms of Ukrainian citizens deprived of personal liberty	-	-	Clause 4, part 42. Coordinates the implementation of measures to protect and ensure the rights and freedoms of Ukrainian citizens who are deprived of their personal liberty in the temporarily occupied territories of Ukraine or are illegally detained or convicted outside of Ukraine as a result of the actions of illegal armed groups, the occupation administration and/or the authorities of the Russian Federation in connection with the public or political activities of such persons in the interests of Ukraine.	-
Powers: collecting information on human rights violations	-	-	Clause 4, part 43. Collects and systematises information on violations of the rights of Ukrainian citizens and persons deprived of their personal liberty as a result of the actions of illegal armed groups, the occupation administration and/or the authorities of the Russian Federation in the temporarily occupied territories of Ukraine.	-
Powers: participation in the protection of state assets	-	-	Clause 4, part 44. Participates in measures aimed at protecting state assets located in the temporarily occupied territories of Ukraine.	-
Powers: implementation of public-private partnerships	-	-	Clause 4, part 45. Carries out public-private partnerships on issues within the competence of the Ministry of Veterans.	Clause 4, part 28. Carries out public-private partnerships on issues within the competence of the Ministry of Veterans.
Responsibilities: collection and analysis of data on environmental damage	-	-	Clause 4, part 46. Collects and analyses information on the need to implement measures related to the reduction of environmental damage in the territories that have been negatively affected by the armed conflict and/or temporary occupation.	-

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Responsibilities: reducing the impact of explosive objects	-	-	Clause 4, part 47. Carries out measures aimed at reducing the social, economic and environmental impact of explosive objects on the life and activities of the population (mine action) and informing the population about the danger of explosive objects.	-
Responsibilities: participation in the preparation of state development programmes	-	-	Clause 4, part 48. Participates in the preparation of the Budget Declaration, drafting the State Programme of Economic and Social Development of Ukraine, the Programme of Activities of the Cabinet of Ministers of Ukraine, taking into account the peculiarities of their implementation in the territories adversely affected by the armed conflict and/or temporary occupation.	-
Responsibilities: dissemination of socially important information	-	-	Clause 4, part 49. Ensures, together with the MCYS, the dissemination of socially necessary information in Ukraine and abroad on issues within the competence of the Ministry of Veterans.	-
Responsibilities: prevention of corruption	Пункт 5, частина 1. забезпечує у межах повноважень, передбачених законом, здійснення заходів щодо запобігання корупції і контроль за їх реалізацією в апараті Служби, на підприємствах, в установах і організаціях, що належать до сфери її управління;	Clause 5, part 1. Ensures, within the powers provided for by law, the implementation of measures to prevent corruption and control their implementation in the apparatus of the Ministry of Veterans, its territorial bodies, enterprises, institutions and organisations under its jurisdiction;	Clause 5, part 1. Ensures, within the powers provided for by law, the implementation of measures to prevent corruption and control their implementation in the apparatus of the Ministry of Veterans, its territorial bodies, enterprises, institutions and organisations under its jurisdiction;	Clause 5, part 1. Ensures, within the powers provided for by law, the implementation of measures to prevent corruption and control their implementation in the apparatus of the Ministry of Veterans, its territorial bodies, enterprises, institutions and organisations under its jurisdiction;
Responsibilities: recruitment and selection	Clause 5, part 2. Carries out the selection of personnel to the apparatus of the Service and to managerial positions in its territorial bodies, enterprises, institutions	Clause 5, part 2. Carries out the selection of personnel to the apparatus of the Ministry of Veterans, its territorial bodies, enterprises, institutions and organisations under	Clause 5, part 2. Carries out the selection of personnel to the apparatus of the Ministry of Veterans, its territorial bodies, enterprises, institutions and organisations under	Clause 5, part 2. Carries out the selection of personnel to the apparatus of the Ministry of Veterans, its territorial bodies, enterprises, institutions and

	and organisations under its jurisdiction, forms a personnel reserve for the relevant positions, organises training, retraining and advanced training of civil servants and employees of the apparatus of the Service and its territorial bodies.	its jurisdiction, organises training, retraining and advanced training of employees of the staff of the Ministry of Veterans and its territorial bodies.	its jurisdiction, organises training, retraining and advanced training of employees of the staff of the Ministry of Veterans and its territorial bodies.	organisations under its jurisdiction, organises training, retraining and advanced training of employees of the staff of the Ministry of Veterans and its territorial bodies.
Responsibilities: planning and financial work	Clause 5, part 3. Organises planning and financial operations in the Service's office, its territorial bodies, enterprises, institutions and organisations under its jurisdiction, controls the use of financial and material resources, ensures the organisation and improvement of accounting in accordance with the procedure established by law.	Clause 5, part 4. Organises planning and financial operations in the apparatus of the Ministry of Veterans , its territorial bodies, enterprises, institutions and organisations under its jurisdiction, controls the use of financial and material resources, ensures the organisation and improvement of accounting procedures.	Clause 5, part 4. Organises planning and financial operations in the apparatus of the Ministry of Veterans, its territorial bodies, enterprises, institutions and organisations under its jurisdiction, controls the use of financial and material resources, ensures the organisation and improvement of accounting procedures.	Clause 5, part 4. Organises planning and financial work in the apparatus of the Ministry of Veterans, its territorial bodies, enterprises, institutions and organisations under its jurisdiction, controls the use of financial and material resources, ensures the organisation and improvement of accounting procedures.
Responsibilities: office management and mobilisation training	Clause 5, part 5. Organises record keeping and archival storage of documents in accordance with the established rules. Clause 5, part 6. Ensures, within the scope of powers provided by law, the fulfilment of tasks on mobilisation training and mobilisation readiness of the state.	Clause 5, part 7. Organises record keeping and archival storage of documents in accordance with the established rules. Clause 5, part 6. Ensures within the scope of powers provided by law: The implementation of state policy on state secrets, the protection of restricted information, and the technical protection of information, and exercises control over their preservation within the Ministry of Veterans; The performance of tasks related to mobilisation training and mobilisation readiness of the state; The involvement of citizens in the management of state affairs, effective interaction with civil society institutions, public oversight over the activities of	Clause 5, part 7. Organises record keeping and archival storage of documents in accordance with the established rules. Clause 5, part 6. Ensures within the scope of powers provided by law: The implementation of state policy on state secrets, the protection of restricted information, and the technical protection of information, and exercises control over their preservation within the Ministry of Veterans; The performance of tasks related to mobilisation training and mobilisation readiness of the state; The involvement of citizens in the management of state affairs, effective interaction with civil society institutions, public oversight over the activities of the Ministry of Veterans,	Clause 5, part 7. Organises record keeping and archival storage of documents in accordance with the established rules. Clause 5, part 6. Ensures within the scope of powers provided by law: The implementation of state policy on state secrets, the protection of restricted information, and the technical protection of information, and exercises control over their preservation within the Ministry of Veterans; The performance of tasks related to mobilisation training and mobilisation readiness of the state; The involvement of citizens in the management of state affairs, effective interaction with civil

		the Ministry of Veterans, and consideration of public opinion in the formulation and implementation of state policy in areas within the competence of the Ministry of Veterans.	and consideration of public opinion in the formulation and implementation of state policy in areas within the competence of the Ministry of Veterans.	society institutions, public oversight over the activities of the Ministry of Veterans, and consideration of public opinion in the formulation and implementation of state policy in areas within the competence of the Ministry of Veterans.
Rights	Clause 6, part 1. To involve, in accordance with the established procedure, scientists and specialists, employees of central and local executive authorities, local self-government bodies, enterprises, institutions and organisations (in agreement with their heads) in the performance of certain tasks and participation in the study of certain issues.	Clause 6, part 1. To involve, in accordance with the established procedure, specialists of central and local executive authorities, enterprises, institutions and organisations (in agreement with their heads), scientists, representatives of civil society institutions (by agreement) in consideration of issues within its competence.	Clause 6, part 1. To involve, in accordance with the established procedure, specialists of central and local executive authorities, enterprises, institutions and organisations (in agreement with their heads), scientists, representatives of civil society institutions (by agreement) in consideration of issues within its competence.	Clause 6, part 1. To involve, in accordance with the established procedure, specialists of central and local executive authorities, enterprises, institutions and organisations (in agreement with their heads), scientists, representatives of civil society institutions (by agreement) in consideration of issues within its competence.
Rights	Clause 6, part 2. To receive free of charge from state and local authorities, enterprises, institutions and organisations regardless of their form of ownership and their officials, as well as citizens and their associations, information, documents and materials necessary to perform its tasks.	Clause 6, part 2. To receive free of charge from ministries, other central and local executive authorities, local self-government bodies the information, documents and materials necessary for the performance of its tasks, including statistical data from statistical authorities.	Clause 6, part 2. To receive free of charge from ministries, other central and local executive authorities, local self-government bodies the information, documents and materials necessary for the performance of its tasks, including statistical data from statistical authorities.	Clause 6, part 2. To receive free of charge from ministries, other central and local executive authorities, local self-government bodies the information, documents and materials necessary for the performance of its tasks, including statistical data from statistical authorities.
Rights	Clause 6, part 3. To convene meetings, form commissions and working groups, hold scientific conferences and seminars on issues within its competence.	Clause 6, part 3. To convene meetings, form commissions and working groups, hold scientific conferences, seminars and other events on issues within its competence.	Clause 6, part 3. To convene meetings, form commissions and working groups, hold scientific conferences, seminars and other events on issues within its competence.	Clause 6, part 3. To convene meetings, form commissions and working groups, hold scientific conferences, seminars and other events on issues within its competence.
Rights	Clause 6, part 4. To use the appropriate information databases of state bodies, the state system of governmental communication and other technical means.	Clause 6, part 4. To use the appropriate information databases of state bodies, the state system of governmental communication and other technical means.	Clause 6, part 4. To use the appropriate information databases of state bodies, the state system of governmental communication and other technical means.	Clause 6, part 4. To use the appropriate information databases of state bodies, the state system of governmental communication and other technical means.



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