

STRENGTHENING ACCESS TO THE REGISTER OF DAMAGE FOR UKRAINE FOR SURVIVORS OF TORTURE AND OTHER RELATED CRIMES

To the Register of Damage for Ukraine (RD4U), the future Claims Commission, Ukrainian authorities, and supporting States

OCTOBER 2026

EXECUTIVE SUMMARY

The Register of Damage for Ukraine (RD4U) represents a historic milestone in advancing compensation for harms arising from Russia's aggression against Ukraine. As the first component of the emerging international compensation mechanism, it provides victims with an opportunity to record losses and injuries for consideration by the future Claims Commission. However, for survivors of torture, sexual violence, unlawful detention, serious personal injury, and other grave violations, significant barriers remain to accessing and effectively using the system.

This briefing¹ draws on consultations with Ukrainian civil society organisations, survivor groups, and practitioners to identify the principal challenges survivors face when submitting claims, particularly within the RD4U's A2 categories.

The consultations identified eight interrelated challenges, including (1) awareness barriers; (2) motivation and trust challenges; (3) digital and technical barriers; (4) evidence and case-building challenges; (5) the risk of re-traumatisation; (6) data protection and security concerns; (7) insufficient referral pathways and support structures; and (8) structural and eligibility concerns.

Against this background, the briefing offers observations and recommendations for consideration by the RD4U, the future Claims Commission, relevant Ukrainian State authorities, and supporting States, with the aim of further strengthening the accessibility, credibility, and survivor-centredness of the international compensation mechanism.

BACKGROUND

The creation of the [Register of Damage for Ukraine](#) (RD4U, Register) was a historic milestone to recognise the harm of Russia's aggression against Ukraine. It was created as the first institutional step towards an international compensation mechanism for damage, loss and injury caused by the Russian Federation's internationally wrongful acts against Ukraine. Its present role is to receive, process, and record claims and evidence. It is not a court, compensation commission, or payment body. It does not assess the merits of a claim, decide the amount of compensation ordered or deliver payment. Those functions are expected to be addressed through the other two components of the mechanism: the International Claims Commission for Ukraine (Claims Commission) and a future Compensation Fund.

As the Register represents the first step in the compensation process, some key details regarding

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compensation payments—including the assessment criteria, amounts, and timelines—remain unclear. The Register’s evidentiary and recording function is therefore important but can be difficult to communicate to potential claimants. Victims, including survivors of torture, are being asked to engage in a process now for an outcome that may come later and through two bodies that are still being developed. This uncertainty can affect motivation, trust, and the willingness to disclose painful experiences. However, since the establishment of the second component of the international compensation mechanism – the Claims Commission – and the preparatory work for its operationalisation are underway, potential claimants may soon have greater clarity on the overall compensation process, particularly once the rules governing the assessment of claims have been published.

As currently structured, claimants may submit claims to the Register under the established categories according to the type of damage, loss or injury suffered. These categories are designed to cover a broad range of harms resulting from the Russian aggression, enabling individuals, businesses, and the State of Ukraine to document their losses and seek compensation. For individual claimants, the categories primarily cover forced displacement, personal injury and harm, property damage or loss, and disruptions to access to public services. According to the Register’s guidelines, individuals may submit multiple claims, including claims in different categories. The RD4U’s A2 claims categories are particularly significant as they relate to severe individual harms. The A2 categories include serious personal injury, sexual violence, torture or inhuman or degrading treatment or punishment, deprivation of liberty, forced labour or service, forced transfer or deportation, and other serious violations. These categories capture experiences that are often under-documented, deeply traumatic, and hard to recount or evidence simply through broad accounts. These claim categories also frequently overlap.

By July 2026, the RD4U had [received](#) over 170,000 claims. Of these claims, only 1,113 claims were [received](#) in category A2.5 (torture or inhuman or degrading treatment or punishment), with only 234 claims received in category A2.4 (sexual violence). These numbers might be low considering that thousands of Ukrainians have [reportedly](#) been held in Russian captivity since the beginning of the full-scale invasion, and that the UN Human Rights Monitoring Mission in Ukraine has [found](#) “widespread and systematic torture and ill-treatment of Ukrainian prisoners of war and civilian detainees by the Russian Federation authorities [...] [t]his includes sexual violence”. According to the organisations consulted for this study, the relatively low numbers of claims received in these and other highly sensitive categories may be a reflection of challenges survivors face in submitting their claims; this briefing explores these challenges and offers recommendations on how to address them.

At the time of writing this report, 39 States and the European Union have signed, and seven States plus the European Union have ratified the [Convention](#) establishing the Claims Commission. Decisions taken at the registration stage will shape later access to compensation. If the system records only the claims of those able to overcome serious barriers, it risks reproducing inequality among victims, failing to reflect the full scale of harm, especially among those victims in situations of great vulnerability, and affecting the legitimacy of the compensation process.

The objective of this briefing is to report field-based findings on the challenges that survivors have faced to submitting claims to the Register and to provide concrete recommendations for the RD4U and decision-makers designing the future Claims Commission. It focuses on torture, serious personal injury and related category A2 claims, while recognising that many recommendations also apply across other categories. The aim is to identify changes that institutional decision-makers and States could make so the compensation mechanism can be accessible, credible, and fair for survivors of serious violations.

The findings and recommendations are based on consultations with thirteen Ukrainian civil society and practitioner organisations including large service providers, survivor organisations, human rights organisations, and legal professionals. The consulted organisations included: 29th December NGO; Alumni Network of Ukrainian Men Who Survived Captivity and Torture; “Civilians in Captivity” Charitable Fund; Civil Network OPORA, Foundation “OPORA in Poland”; De-Jure Law Firm; Dynamic Association of People (DAP); Human Rights Centre ZMINA; NGO “Association of Relatives of Political Prisoners of the Kremlin”; Public Organization “Blue Bird”; Right to Protection Charitable Fund; SEMA Ukraine; the Ukrainian Bar Association Human Rights Institute; and Ukrainian Legal Advisory Group. This briefing is also informed by research, participation in the Register of Damage Forum held in Kyiv in March 2026, informal conversations, and written input. The organisations consulted had different levels of experience with the RD4U, different types of relationships with survivors and different levels of exposure to torture-related claims. The preparation of this briefing also included discussions with representatives of the Register of Damage to clarify aspects of the claims process and institutional practice. The findings reflect practice as understood in mid-2026 and should be read as a grounded snapshot in a fast-moving environment.

The findings of this report should be understood in the context of the RD4U as a relatively new and evolving mechanism. Established in May 2023, the Register began accepting claims in April 2024 and is the first international mechanism of its kind to operate while an armed conflict remains ongoing. Claims categories have been introduced progressively and, at the time of publication, the final categories are only now becoming available. The development of the Register’s digital infrastructure, including its integration with relevant Ukrainian State databases, as well as efforts to build referral and support networks involving civil society organisations, legal aid providers, and State institutions, remain ongoing. In this context, the barriers identified in this report reflect both structural challenges faced by survivors and practical issues arising during the implementation of a new and unprecedented claims process. Addressing these barriers at an early stage will be critical to ensuring that the mechanism is accessible and effective for all potential claimants.

CHALLENGES VICTIMS FACE IN FILING TORTURE AND OTHER RELATED CLAIMS

Awareness barriers

Many survivors do not know about the RD4U or do not know enough about it to make an informed decision about whether to submit a claim. Some have heard about the Register but do not understand what it does, what categories are open, how the [online submission platform \(Diia\)](#) works, or how the RD4U differs from other programmes such as eVidnovlennia (Ukraine’s eRecovery programme, a domestic compensation procedure for war-damaged or destroyed housing). Awareness varies by region and social group, and can also vary depending on the awareness raising activities undertaken by public authorities in different regions and communities, alongside CSOs and other assistance providers. Internally displaced persons who are already connected to humanitarian or support services may be more likely to hear about the RD4U, while older people, rural communities, people near the frontline, and those outside service networks may remain unaware.

Practitioners report that public information campaigns can generate immediate increases in awareness. Word of mouth is also powerful, especially where trusted organisations or survivor networks explain the process. However, reliance on informal channels is not enough. Survivors of

torture, detention, sexual violence, and other A2 harms often require careful, trusted, two-way, and repeated communication before deciding whether to engage.

Motivation and trust

Consultations have highlighted that survivors' motivation to engage is shaped by their understanding of the mechanism, their trust in institutions, their immediate needs, and their physical and psychological state. The practitioners consulted see the RD4U as important for documenting violations, strengthening the record of harm, and preparing for future compensation, but survivors are reportedly still sceptical. They ask whether compensation will ever be paid, where funds will come from, whether Russia will pay, whether international partners will provide resources, and whether the process is worth the emotional cost.

Some practitioners have noted confusion and frustration caused by perceived divisions between those who left Ukraine and those who have stayed. Some practitioners have noted that people who have left Ukraine may submit applications in at least categories A1.1 and A1.2, while some people who have remained in Ukraine and experienced a constant sense of danger may perceive that they will not have the opportunity to apply under any category unless they have suffered property damage or other harms covered by the available categories. Of course, the lived experience of people who have left Ukraine and people who have stayed is varied, and people in and outside of Ukraine may have suffered a wide array of different violations due to Russia's aggression. Clear communication on available claim categories and the rationale for limiting claims to certain categories might help mitigate the risks of the Register's work generating distrust or a sense of injustice among certain members of the public.

For some survivors, other urgent priorities come first, such as medical rehabilitation, psychological support, resocialisation, legal status as a person deprived of liberty, replacement of documents, housing, or family tracing. Some relatives hesitate to submit a claim because doing so may feel like acknowledging that a missing person is gone. Others fear that a painful submission process with no clear result will compound harm. Motivation is likely to increase as the compensation mechanism becomes more concrete, sustainably funded, and further explained. For these reasons, honest expectation management and clear two-way accessible information are essential.

In addition, survivors and CSOs have [raised concerns](#) about their limited opportunities for participation in discussions regarding the design of compensation mechanisms, including the RD4U and the Claims Commission. The insufficient involvement of survivors and CSOs in the design phase may undermine the legitimacy of these mechanisms and, consequently, reduce survivors' willingness to submit claims. This is particularly concerning because without sufficient survivor and CSO input into their design, the mechanisms may fail to adequately account for the specific barriers and challenges that certain survivors face when filing and following up on their claims. In September 2026, the Preparatory Committee for the Claims Commission published a [call for participation](#) in exchanges of views with civil society organisations, a positive step towards ensuring survivor and CSO participation in the design of the Claims Commission. Though it was established after the design phase for the RD4U, the RD4U has also created a [Civil Society Coordination Platform](#) to coordinate the work of the RD4U and CSOs. The RD4U and the Claims Commission have an opportunity to continue and deepen their existing engagement with survivors and CSOs to ensure the effectiveness of the international compensation mechanism.

Diia and technical barriers

Digital submission through the online portal [Diia](#) is currently the only available avenue for submitting claims. Diia is a digital service platform provided by the Ukrainian State, and RD4U claim submission is one service among many that are provided for Ukrainian citizens. The use of the Diia portal for claim submission creates opportunities for scale, but also significant exclusion risks. Survivors reportedly sometimes lack a suitable device, internet access, digital literacy, a functioning phone number linked to banking applications, or the ability to create a Bank ID or digital signature, required for the submissions. Some experience bugs or technical failures. Others lose connection or are interrupted by air raids, displacement, electricity cuts, caregiving responsibilities, or emotional distress. Some survivors have reportedly lost some of their progress and/or had to restart when their session has expired or the system has crashed during submission. Technical issues in the Diia platform can also arise due to Russia's attacks on Ukrainian infrastructure.

Additionally, it appears that some of the expected tools are not yet available to all applicants. For example, in terms of post-submission claim management, users may not yet have access to functionalities that allow them to modify or supplement previously submitted applications (though the claims management functionality – which will allow claimants to supplement their previously submitted claims, and have access to information on the status of submitted claims – is expected to be available by the end of 2026). During claim submission, practitioners have reported challenges when trying to return to a previous step of the claim form, as well as the disappearance of drafts (particularly during updates or restarting of the Diia system). Some of the technical issues experienced by users may involve aspects that are not directly within the RD4U's control, but which may require cooperation with the relevant Ukrainian digital authorities.

Technical barriers are not merely inconvenient. For survivors of torture and serious injury, the submission process can require recalling traumatic events, locating documents, making decisions about claim categories, and uploading sensitive evidence. When the system is interrupted or inflexible, the emotional and practical burden increases. Reports that submissions can take from forty minutes to several days show that the process can be complicated and burdensome for many A2 claimants.

The RD4U has [indicated](#) that “[i]n due course, those who are unable to use Diia for claims submission will be afforded the opportunity to submit their claims with assistance from the Centres for Provision of Administrative Services in Ukraine.” The [centres](#) are State-run offices and it will require the cooperation of relevant State authorities for this assistance to be operationalised. This option could help claimants overcome some of the technical barriers discussed above, though it remains unclear when this option will become available.

Evidence and case-building problems

Evidence for A2 claims is often difficult to obtain. Survivors may have no documents because records were destroyed, left in occupied areas, held by inaccessible institutions or never created. Testimony may be oral and undocumented. Criminal proceedings may not exist, may have been opened without the survivor's involvement, or may not have developed sufficiently to produce useful materials. In order to submit a claim to the RD4U, claimants **do not** have to submit any evidence, as the RD4U and the future Claims Commission form part of a mass claims process with a lower threshold regarding evidence (as compared to a court). Claimants do have the option to submit evidence, however, and the abovementioned challenges can make this more difficult.

Some survivors have already told their story repeatedly to investigators, State bodies, journalists, or organisations and do not wish to repeat it again. This issue is particularly relevant in cases of conflict-related sexual violence, because of gender norms and social stigma (factors which also add to the challenges of obtaining medical evidence). These often also prevent survivors from reporting promptly.

Practitioners also report uncertainty about what evidence the RD4U considers relevant. The Register provides general guidance on the claims categories, as well as helpful information boxes in the Diia platform, but the information provided could be strengthened through including practical examples, **without becoming overly prescriptive and while emphasising the RD4U's flexible approach to evidence**. This could include examples of what kinds of documents to upload, what information to include in a victim or witness statement/written testimony, how to describe missing evidence, how to link medical records to torture, how to present detention in multiple facilities, and how much detail is necessary for the consideration of the claim. File size limits can force applicants to prioritise evidence without knowing what matters most. Requests to State bodies can cost money and time. Without clearer guidance, the quality of claims may depend too heavily on the claimant's access to documents and information they have directly at hand. If carefully crafted, additional guidance could support claimants to submit strong claims while maintaining the RD4U's emphasis on flexibility and ensuring that claimants understand that evidence is optional.

While the Register provides [rules, instructions, and "FAQs"](#) for each claim category, the information provided could be made clearer and easier to understand in terms of how the different categories interact with each other, and how survivors should choose between the categories when submitting a claim. For example, the [Claim Form and Rules for Claims category A2.3](#) concerning serious personal injury states that "Claims related to serious personal injury as a consequence of sexual violence, torture or inhuman or degrading treatment or punishment, deprivation of liberty, or forced labour or service may be submitted either in this category, as a separate Claim, or as part of the categories concerning sexual violence, torture or inhuman or degrading treatment or punishment, deprivation of liberty, or forced labour or service." It may benefit survivors if further information were provided on whether there is any advantage to submitting the claim in one category or another, whether there are any differences in the information required for each category (for example, through a clear side-by-side comparison chart), and whether and how a survivor could incorporate by reference any information or evidence provided in one category to another claim submitted in a different category.

According to the [Claim Forms and Rules](#) for the A2 categories, in general survivors are advised to include in their claims expenses directly related to the harm covered by a given A2 category such as the cost of medical treatment and rehabilitation, yet "Claims related to other pecuniary consequences of [the harm] such as loss of income or gainful employment, shall be submitted in other relevant categories." The claim categories A3.4 concerning loss of gainful employment and A3.7 concerning "Other economic losses" were opened in August and September 2026, respectively. The A2 and A3 categories are separate, and claims in these categories may be submitted independently and do not necessarily need to be filed at the same time. However, for a survivor who already submitted a claim in the A2 categories before relevant A3 categories were opened, it seems that the survivor would effectively have to re-engage with the submission process now that the relevant category is open in order to report certain kinds of pecuniary consequences of the underlying harms forming the basis of the A2 claim(s). This raises several questions and concerns. First, were survivors notified when submitting their A2 claims that they will need to wait to submit an additional claim concerning pecuniary consequences from the same circumstances underlying their A2 claim, and have they been

personally notified that the relevant categories have been opened? If it has not been possible to notify claimants individually yet, maybe such a notification could be sent out once the claims management functionality in Diia becomes available. Second, the RD4U has indicated that, where applicable, claimants can reuse information and evidence from a previously submitted A2 claim when submitting an A3.7 claim through Diia, to avoid having to retell their story. The RD4U should make this clear not only in the guidance provided for those who pursue A3 claims, but also by proactively notifying those who have already submitted A2 claims. Third, this raises the concern that the harm suffered by survivors will not be recorded (and later assessed) holistically, but rather in an artificially piecemeal manner. For many survivors of the types of harms included in the A2 categories, pecuniary consequences such as loss of gainful employment compound the trauma and psychological impact of the underlying harm, giving this pecuniary loss a different character than that of someone who lost their employment because their employer went out of business, for example. Though precisely how claims will be assessed by the future Claims Commission remains an open question, it is plausible that the way in which claims are initially recorded by the Register – for example, whether an A3 claim is clearly linked to the underlying violation recorded in an A2 claim – could impact their later assessment.

According to the RD4U, claimants can include multiple events within a single claim submitted through Diia, meaning that different detention locations or periods do not necessarily require separate claims. However, if a claimant prefers to describe each event separately, they may submit separate claims.

However, some survivors consulted have noted that survivors of prolonged captivity, torture, and CRSV have found that in practice they need to submit separate claims for each detention location and period, even when the underlying evidence and legal basis of the claims are identical. Because many victims were transferred repeatedly between facilities over months or years, this can require dozens of duplicate applications supported by the same criminal case files and status documentation. The result is (1) re-traumatisation through repeated recounting of abuse; (2) increased risk of clerical errors and unnecessary technical burdens caused by repeated submission of identical documents; and (3) significant delays in documenting harm and submitting claims. Both the functionality of the RD4U claim form and the guidance provided by the RD4U should be checked to identify why survivors have encountered the need to submit separate claims for each detention and period, despite the fact that the claim forms are supposed to allow for multiple events to be added within a single claim.

With regard to category A2.1 (death of an immediate family member), one consulted organisation noted that there is currently no technical possibility to submit a claim on behalf of a child (for example, by a mother or father in cases where the other parent has been killed).² There are also difficulties arising from the lack of identity documents relating to the deceased immediate family member, which contain identification information that is required for submitting a claim. Obtaining replacement documents through State authorities in order to find the required information is often a difficult and lengthy process, which can discourage claimants from submitting a claim if they cannot find the required identification information without a replacement document.

Re-traumatisation

Re-traumatisation is a major barrier. Survivors of torture and other ill-treatment, including sexual violence, may be asked to recount experiences across several processes: criminal investigations, doc-

² According to the RD4U, the possibility of submitting an A2.1 claim on behalf of a child is included in the Diia modernisation plan and is expected to become available in the near future. A separate announcement will be made once this functionality becomes available.

umentation initiatives, psychosocial assessments, legal consultations, and RD4U submissions. Newly released civilians may be approached by multiple actors within days of release. This can confuse, exhaust, and harm them.

Trauma-informed practice requires considering timing; ensuring accessibility, privacy, and consent; and employing gender-competent and other differentiated approaches. Survivors must have choice and control. Survivors should know why information is requested, what level of detail is necessary, whether they can pause during the submission process, whether they can return later, and how their data will be used. Practitioners try to involve psychologists and use sensitive interviewing methods, but capacity is uneven. For example, in cases of gender-based violence, the survivor should be able to choose the gender of the person that will conduct an interview. A trauma-informed approach cannot depend only on the skill of individual practitioners. It must be embedded in form design, guidance, support pathways, and future claim assessment criteria.

Data and security concerns

Fear about data security is a significant reason some survivors hesitate to submit claims. People worry that the Russian Federation might obtain information about submissions, that relatives in occupied territories could be endangered, or that survivors in frontline or recently liberated areas could face risk if territory is reoccupied. These fears are not abstract. They affect whether survivors trust the mechanism and what information they are willing to provide.

Plain-language privacy explanations are vital. Claimants need to know who receives their data, where it is stored, whether Ukrainian authorities can access it, whether and when it will be shared with the future Commission, what safeguards apply, whether evidence can be restricted, and what happens if a claimant later wishes to update or withdraw information. Much of this information is already available on the RD4U website, including in the [Principles on the Protection of Personal Data in the Work of the Register](#) and the [General FAQs](#). Each claim form also includes consent information on the transfer and processing of personal data. Given the reported fear about data security as a potential deterrent for survivors to submit claims, however, the RD4U could consider providing plain-language explanations to improve the clarity and accessibility of this information.

Lack of established referral pathways and institutional support

Consultations indicate that many survivors need assistance to submit claims. Assistance may include legal advice, technical support, help understanding categories, support selecting and preparing documentary evidence, drafting support, psychosocial support, and access to a safe location and to safe equipment. In-person support can work well where a practitioner sits with a survivor while the survivor uses their own device, or the practitioner provides a device for survivors who do not have a suitable device of their own. Practitioners can help survivors navigate the claim submission forms and provide other direct support.

At present, some practitioners note that the role of support actors is not sufficiently acknowledged. Practitioners (lawyers, NGOs, CSOs) often provide practical assistance to help claimants, but cannot formally submit the claims on their behalf. This potentially creates risks for claimants and practitioners, especially around consent, personal data, use of work or personal devices, and legal responsibility. The option of submitting claims through a representative for natural persons has been discussed but has not yet been operationalised; this option should be launched and referral pathways should be clearly communicated region by region. The RD4U has taken steps that reflect recognition of the

important role of CSOs and other actors, including by creating the Civil Society Coordination Platform, by publishing information on organisations assisting claimants, and through its ongoing capacity-building and outreach activities. Consultations nevertheless suggest that the role and practical parameters of assisted submission could be further clarified and developed.

The organisations with the deepest trust relationships with survivors – such as small survivor organisations – often have little capacity to support survivors with a time-intensive claim submission process, given limited resources and other urgent priorities. Larger organisations may have more infrastructure but less exposure to torture-related claims or weaker trust relationships with survivor communities. Many organisations have one or two necessary elements (access, legal expertise, psychosocial skills, operational capacity) but rarely all at once.

Support from institutions is therefore essential. Potential entry points identified by the persons consulted include administrative service centres (TSNAPs/CNAPs), notary offices, Ombudsperson offices, volunteer lawyers, humanitarian hubs, relocation hubs, resilience centres, and centres for rescued persons. Some initiatives are emerging, but no scaled-up system exists. Provision of support, including through institutions, should be contingent upon adequate training, resources, suitability for claimants in a position of vulnerability, data protection, legal accountability, and the time required for complex A2 claims. Support infrastructure should ideally be institutional, properly resourced, and quality-assured. NGOs and survivor groups should inform and complement it, but should not be made responsible for making the system work. To the extent that the system relies on the support, knowledge, and capacity of NGOs and survivor groups, they should be allocated funding by donors to allow them to sustainably play this role.

Need for victim-centred claim design

According to the [RD4U website](#), the RD4U “is strongly committed to pursuing a victim-centred approach” in its operations, resting on the fundamental principles of inclusivity, participation, accessibility, and security. The RD4U has an opportunity to build upon this commitment by considering feedback from the consulted organisations on this point. In consultations, a recurring concern was that survivor-centredness (or victim-centredness) is sometimes understood primarily as reducing what is asked of survivors. According to the organisations consulted, minimising unnecessary questions and evidence requirements in claims forms is important, but it is not sufficient. For survivors of torture and other related crimes, a genuinely survivor-centred (or victim-centred) process also requires accessible information, two-way communication, informed choice, do-no-harm safeguards, realistic expectation management, the possibility to pause and return, and access to support and referral pathways where legal, psychosocial, medical, or protection needs arise. Claims mechanisms should be responsive to the specific needs of individuals in situations of heightened vulnerability.

Compensation mechanisms, including their claims processes, must be victim-centred. A victim-centred system does not lower evidentiary standards or undermine future adjudication. It improves the quality of the record by making it possible for survivors to submit accurate, complete, and safe claims. It recognises the potential complexity of torture and other related claims.

The goal should be to ask survivors to do things once, safely and well, and equip them with the necessary support and information to understand why information is needed, provide it in a form that can be meaningfully used later, avoid duplicative narration, and receive referrals when the claims process reveals unmet needs beyond compensation.

Pre-2022 continuous violations

One of the most acute issues concerns violations that began before 24 February 2022 and continued afterwards. A person detained in 2018 and released in 2025 may have suffered a continuous deprivation of liberty and repeated torture or ill-treatment across the relevant period. Current eligibility framing allows claims for damage, loss or injury on or after 24 February 2022, but survivors and practitioners are uncertain how to present the full factual context.

Some stakeholders have suggested entering 24 February 2022 as the start date and explaining the full timeline later in the submission. Others fear that doing so may risk disqualification or misrepresentation. A narrower approach of mentioning only post-24 February 2022 events may erase the continuity of harm and distort the survivor's experience. This uncertainty reportedly demotivates survivors and increases stress. It is a problem that the RD4U and the future Commission should resolve through clear public guidance. To the extent this is addressed in existing RD4U guidance, such information may need to be made more visible and/or clear given that uncertainty reportedly remains.

Beyond this, the consulted organisations and individuals all warned that the current limitation of the temporal scope before 24 February 2022 will create frustrations and fractures in Ukrainian society. Survivors consider that there is discrimination among groups of victims and an unjustified and harmful exclusion of victims since the beginning of the Russian aggression on 20 February 2014. It will also create legitimacy concerns for the international compensation mechanism. Survivors have made [public calls](#) to extend the temporal scope of the international compensation mechanism. Fortunately, the Preamble of the [Convention establishing an International Claims Commission for Ukraine](#) notes "the possibility of a future amendment to this Convention to allow its temporal scope to be extended to 20 February 2014". This decision rests with States Parties to the Convention Establishing the Claims Commission.

THE ROLE OF STATES, COMPLEMENTARITY WITH DOMESTIC REPARATION MECHANISMS, AND SURVIVOR PARTICIPATION

While the Register is responsible for the critical work of recording claims as the first component of the international compensation mechanism, States will be decisive in determining whether the international compensation mechanism as a whole becomes a meaningful reparation pathway for victims, or remains primarily a record of unremedied harm. As decision-makers on the mechanism's scope, institutional design and financial sustainability, States should ensure that the international compensation mechanism is capable of responding to the full reality of Russia's violations against Ukraine. This includes using the flexibility provided in the preamble of the Convention establishing the Claims Commission to expand its temporal scope so that victims of violations which took place before 24 February 2022 are not excluded. The current temporal approach risks fragmenting victims' experiences, and weakening the legitimacy and trust in the mechanism.

The international compensation mechanism should be designed and funded as part of a broader reparation ecosystem, not as a substitute for Ukraine's domestic [responsibilities](#) or urgent survivor support provision. Compensation through the international compensation mechanism is likely to take time: the Convention has yet to enter into force, institutional rules must still be established, claims assessed, evidentiary standards applied, and payment structures built. Survivors of torture,

unlawful detention, serious injury and related violations, however, have immediate needs that cannot be deferred until compensation is eventually awarded. They may require urgent medical care, psychological and psychosocial support, rehabilitation, housing assistance, livelihood support, documentation, legal aid, and social reintegration.

The international compensation mechanism and domestic support or reparation measures have distinct legal bases; the former is an international institution established under international law, while domestic schemes are established and administered by the Ukrainian State. Even so, where possible, States, Ukrainian authorities, the RD4U and the future Claims Commission should aim to promote complementarity between the international compensation mechanism and Ukraine's domestic reparation and rehabilitation measures, including the *Law 4067-X on Legal and Social Protection of the Rights of Survivors of Sexual Violence Related to the Aggression of the Russian Federation against Ukraine and provision of Urgent Interim Reparations to Them* (known as the Bardina Law) and other existing or future programmes. If properly funded, domestic measures could provide faster, needs-based assistance and rehabilitation. Sustained funding for rehabilitation and interim support is a rational investment in Ukraine's recovery. Reconstruction cannot succeed if victims of the gravest violations are left without treatment, stability or means of reintegration while waiting years for compensation. Supporting victims' physical and psychological rehabilitation, family and community reintegration, and ability to return to education, employment or public life would reduce long-term social and economic costs. It would strengthen social cohesion, support Ukraine's post-war economy, and contribute to a healthier society capable of recovery after mass harm. Funding urgent reparation programmes is not separate from compensation; it makes eventual compensation meaningful and prevents delay from deepening harm.

These domestic pathways and the international compensation mechanism should be mutually reinforcing. Receipt of domestic or other interim support does not in itself prevent claimants from submitting a claim to the RD4U, though it is currently unknown whether and how such support might ultimately be taken into account in the assessment or award of compensation by the future Claims Commission. Domestic support should not prejudice later international claims, and future international compensation should take note of earlier assistance without penalising victims for having received urgent assistance. Clear coordination would help avoid duplication and inconsistent treatment of survivors, while ensuring that urgent relief is recognised as an essential component of reparation and reconstruction. Ideally, coordination between the international and domestic mechanisms should help to minimise the number of times victims must recount their stories and provide evidence for their claims, thereby helping to mitigate the risk of re-traumatisation.

As a means of overcoming some of the structural barriers that survivors face throughout the compensation process, it is essential to ensure their meaningful and effective participation at every stage, including in the design and implementation of compensation mechanisms. Survivors, together with civil society representatives, possess valuable knowledge, experience, and expertise that should inform both the procedural and substantive aspects of reparation mechanisms. Their participation is critical to ensuring that these mechanisms are accessible, inclusive, and responsive to the diverse needs and experiences of victims, including those in situations of particular vulnerability.

RECOMMENDATIONS

The Register has already been making laudable progress to help victims realise their right to com-

pensation through recording thousands of claims. The recommendations below are intended to help address barriers that some victims have faced and to build on the Register's work; the implementation of these recommendations will depend on the respective roles and responsibilities of the Register, Diia and relevant Ukrainian authorities, States, and the future Claims Commission.

RECOMMENDATIONS TO THE REGISTER OF DAMAGE (AND FUTURE CLAIMS COMMISSION)

Address information barriers

- Accessible information should be provided to survivors on how to submit claims, alongside the adoption of measures to address the barriers they may encounter throughout the process. Such measures should include in-person outreach and two-way communication, the provision of technical and technological assistance, and efforts to strengthen the capacity of organisations that work or will work with survivors. The Register has made progress in this regard, and could continue to strengthen these efforts.
- Building on the guidance already available on the RD4U's website and in the Diia portal, the RD4U could consider publishing additional specific guidance for each A2 category, expanding practical examples in areas where consultations indicate recurring uncertainty. Such guidance could use accessible language and practical examples to explain how to present missing evidence, oral testimony, medical records, psychological harm, detention in multiple facilities, multiple perpetrators, related criminal proceedings, and overlapping categories. The RD4U should also provide clear guidance on the next steps following the submission of an application. In some cases, it is currently unclear whether claimants are required to take any further action, as the meaning and implications of the platform's color-coded status system are not always evident. As and when information on the Claims Commission's assessment criteria and procedures becomes available, it will also be important to timely share this with practitioners and claimants.
- The RD4U should issue public guidance on how to submit claims for violations that began before 24 February 2022 and continued afterwards. The guidance should explain whether and how claimants may describe the full factual chronology, and how to identify post-24 February harm within a continuous violation.

Strengthen survivor-centred approaches

- Building on its existing approach, the RD4U should adopt trauma-informed safeguards that reflect a fuller understanding of survivor-centredness. Minimising unnecessary questions and evidence requirements is important and reflects the Register's stated commitment to victim-centredness, but it should not be confused with leaving survivors without clarity, feedback or support. Forms and guidance should explain in plain language why sensitive information is requested, what level of detail is useful, what is mandatory or optional, and how information may be used later. The design of the Claims Commission, and indeed the process of its design, should also embody [survivor-centredness](#).
- The RD4U, in cooperation with Diia, should consider providing more detailed guidance on how sur-

vivors can pause, return, correct and supplement information. For example, given that some survivors may have issues with sustained internet connectivity, the RD4U should provide clear information to survivors on how they can avoid losing part or all of their submission when they lose internet access while working on the submission.

- Relevant Ukrainian authorities, service providers, and CSOs should continue to establish comprehensive referral pathways to legal, psychosocial, medical and protection support for war-affected people. The Register should work with CSOs and practitioners to provide victims with clear information on referral pathways where needed.
- Institutional staff and support providers should be trained by their institutions in trauma-informed practice, including managing secondary trauma and supporting survivors' autonomy and agency; and independent service providers, CSOs and practitioners should seek such training from relevant specialised organisations and institutes.
- The RD4U and the future Claims Commission should ensure meaningful survivor participation in discussions concerning the design and operation of the international compensation mechanism. Although the Register has already been established and is operational, it remains essential to systematically seek and incorporate feedback from survivors and civil society organisations through continuous consultation and two-way communication. Recognising the Register's Civil Society Coordination Platform and the Preparatory Committee for the Claims Commission's [planned exchanges](#) with civil society, the RD4U and the Preparatory Committee should further broaden these channels, and actively ensure their accessibility to survivor organisations.
- The RD4U should continue to explain that recording a claim is not a decision on the merits, value or payment. At the same time, communications should continue to affirm why recording claims matters: preserving evidence, recognising harm, preparing for assessment and contributing to a future compensation pathway.
- Beyond information provided in the claim forms, the [Principles on the Protection of Personal Data in the Work of the Register](#) and the General FAQs, the RD4U should provide plain-language explanations to improve the clarity and accessibility of information on privacy, data security and transfer, to ensure that claimants can easily understand data storage, access, retention, confidentiality, security measures, future transfer to the Claims Commission, and sharing of data with other actors. The RD4U should share tailored information specifically addressing risks for people living in or with relatives in occupied territories, people near the frontline and those fearing reoccupation.

Address the technical and substantive obstacles to submitting claims

- The RD4U should design for real-life conflict conditions: unstable internet, air raids, electricity cuts, device sharing, displacement, limited literacy, and loss of phone access. The claim submission forms should allow saving (including saving an individual section of a claim), pausing, returning, offline preparation where feasible, and clear checklists before starting. Some practitioners have suggested that the Diia platform should include an automatic server-side draft saving feature, with drafts saved

every 5 to 10 minutes on the server rather than only locally in the browser, so that drafts are not lost during system updates. They have also suggested that claimants should be warned about scheduled maintenance or updates of the Diia platform, as well as session expiry, and should be given ways to avoid losing work. Support points should be established throughout Ukraine and have clean devices, privacy arrangements, and trained staff providing in-person assistance. Whatever the precise technical and practical fixes, the claims process should be designed to minimise the risk of claimants losing work due to connectivity problems, power interruptions, platform updates, session expiry, or other disruptions, and clear guidance should be provided on how to ensure the successful technical submission of claim forms. Achieving this may require cooperation between the RD4U, Diia, and relevant Ukrainian authorities.

- The RD4U should ensure that claimants are clearly informed of the following before beginning the process of submitting a claim form:
 - Whether information is saved automatically or whether a separate action is required to save;
 - How to tell if information has been saved and whether the claimant will receive any confirmation that a section or draft has been saved;
 - What happens to information already entered in the event of an internet disconnection, power outage, or session timeout;
 - How long drafts are retained and whether work can be continued from a different device;
 - What happens to files that were being uploaded if internet connection is interrupted during the upload.
- Claimants should be able to easily correct errors, add evidence and provide supplementary information after filing, as set out in Article 15 of the [Claims Rules](#). As part of the anticipated claims management functionality in Diia (expected to be available by the end of 2026), the Register should provide clear, plain-language guidance on how claimants can provide supplementary information and any relevant deadlines for doing so. This is particularly important for survivors who later obtain medical records, criminal case materials, detention documents, witness statements or psychological assessments.
- While the platform provides explanations of each claim category and illustrative examples, the Register should provide clearer guidance on the interaction between categories, including how survivors should proceed where the same underlying facts may give rise to claims under multiple overlapping categories. In those cases, the claim submission system should reduce the need for duplicative narration to the greatest extent possible, for example, by informing claimants that they are allowed to indicate that evidence is already provided in another claim or that claimants can easily copy/paste an answer provided in one claim category into another claim category. Ensuring that claimants can incorporate previously submitted claims by reference when later filing a new claim could also help mitigate the risk of inconsistencies between claims. This is particularly important where multiple claims arise from the same or related underlying facts, as wording, dates, or levels of detail may vary

when claims are submitted at different points in time.

- One survivor organisation consulted proposed the creation of a “master case profile” functionality within Diia for category A2 claims, allowing claimants to complete general information about their case only once, and including a functionality to allow a claimant to add a new incident or location to the case. For each new incident, the system would ideally then automatically populate the new claim with relevant general information (such as criminal case number) and core supporting documents from the master case profile, so the claimant would need only provide additional information specific to that particular incident. To the extent that existing claim forms already allow several events to be included within one claim, the above suggestions would represent a further usability enhancement. At the same time, the Register could consider gathering further input on the accessibility and visibility of this feature in the existing claim forms, as some consulted organisations reported that survivors had to submit many separate claims in relation to a single underlying narrative.
- The Register should also provide clear information to claimants on what is expected of them when evidence relevant to their claim is already held by another authority. For example, the Register should clarify in its guidance materials whether, if a relevant document or information is already contained in materials of a criminal investigation or held by another Ukrainian State authority, claimants should simply indicate this fact and the relevant authority or case number, or whether claimants must independently obtain the relevant documents and upload them through Diia.

Create safe representative and assisted submission pathways

- States and Ukrainian authorities should resource a scaled, comprehensive support model that may include trained public and quasi-public access points, legal aid, notaries where appropriate, administrative service centres and specialised referral routes for complex A2 claims. Survivors should be informed about available pathways and their capacity levels. Quality assurance should be built in. Civil society and survivor organisations should be consulted and funded for their expertise where they choose to participate, but the system should not depend on unpaid or under-resourced CSO or survivor labour. The RD4U should support such efforts through its coordination and information-sharing functions.

Coordinate with stakeholders and compensation mechanisms

- The RD4U and future Claims Commission decision-makers should continue and further develop structured dialogue with Ukrainian authorities, institutions from other reparation initiatives, civil society, survivor groups, legal practitioners and psychosocial experts. Coordination should be used to improve rules, forms, guidance and support infrastructure. The international compensation mechanism must be publicly accountable for accessibility.
- The RD4U and future Claims Commission should ensure coordination with other compensation – and, where possible, accountability – bodies, to ensure complementarity, share information to the extent possible, and enable survivors to avoid having to repeat traumatic accounts unnecessarily.
- Once operational, the future Claims Commission should, as a matter of priority, clarify how urgent

interim support provision will be considered in later compensation awards, ensuring that victims are not penalised for receiving urgent interim relief, and that support provided now does not create uncertainty.

RECOMMENDATIONS TO STATES

Ensure meaningful survivor participation in the design of the international compensation mechanism

- States should ensure [meaningful survivor and civil society participation](#) in discussions concerning the design and operation of the international compensation mechanism. States should take concrete steps to ensure that survivors and civil society organisations are meaningfully included in the preparatory work for the Claims Commission.

Expand the temporal scope of the international compensation mechanism

- States should expand the temporal scope of the international compensation mechanism to violations from before 24 February 2022, to cover all victims.

Commit sustainable funding to advance survivor-centred reparation for Ukraine*

- The international compensation mechanism will not be able to deliver on its mandate without sustained funding for all its components. States, including the State of Ukraine, should commit sustained and significant funding to the mechanism's operations. They should treat this as investment in the future of the country. States should also take steps to ensure that the Russian Federation funds the Compensation Fund, for example by folding the costs into any peace agreement, and coupling this with innovative short- and long-term strategies to recover the funds from Russian assets.
- Donor States should communicate that financial support is contingent on making the compensation process accessible, helping address the barriers faced by all survivors in accessing the mechanism. As such, States should support legal aid, psychosocial support, medical documentation, outreach, and safe assisted submissions so that victims can practically use the mechanism.
- States should consider the international compensation mechanism and Ukraine's domestic reparation and rehabilitation frameworks, including the Bardina Law, as mutually reinforcing components of the reparation ecosystem. States should use their funding commitments as an opportunity to promote complementarity between international and domestic reparation pathways.
- States should provide dedicated funding for domestic Ukrainian reparation and assistance programmes to provide urgent medical care, psychological and psychosocial support, rehabilitation, legal aid, documentation, housing, livelihood assistance, and social reintegration for survivors whose needs are immediate and cannot wait for the international compensation mechanism to deliver compensation. Information about the international compensation mechanism and claim-submission support could be integrated into relevant domestic reparation and assistance pathways to ensure that survivors receive both urgent support and compensation under international law.

*For a more detailed discussion on how States can support survivor-centred reparation for Ukraine, see REDRESS's [Guidelines for Repurposing Russia-linked Assets to Finance Reparation for Victims of the War in Ukraine](#).

- States should fund civil society and survivor organisations that provide trusted rehabilitation, legal support, and accompaniment to survivors, while ensuring that public institutions remain responsible for delivering accessible, coordinated, and sustainable support.
 - For many organisations, including survivor organisations, one of the barriers to more active involvement in supporting claimants to submit claims to the Register is the resource-intensive nature of this work. Such organisations have existing trusting relationships with relevant communities, and many would be willing to contribute to such efforts. However, systematic claimant support requires dedicated human and financial resources. States should ensure dedicated funding for civil society organisations and particularly for survivor organisations for this purpose.
- States should treat funding for reparation as part of rebuilding Ukraine, which requires not only investment in infrastructure, but also the recovery, health, reintegration, and participation of victims and affected communities.

REDRESS is an international human rights organisation that represents survivors of torture in obtaining justice and reparations. We bring legal cases on behalf of individual survivors, and advocate for better laws to provide effective reparations. Our cases respond to torture as an individual crime in domestic and international law, as a civil wrong with individual responsibility, and as a human rights violation with State responsibility.

This publication was co-funded by the European Union as part of the [Global Initiative Against Impunity for International Crimes and Serious Human Rights Violations: Making Justice Work](#). Its contents are the sole responsibility of REDRESS and do not necessarily reflect the views of the European Union.