

Red Barnet and SOS Børnebyerne response to the Draft Strategic Framework for Denmark's Partnership with Ukraine 2025-2028

Red Barnet and SOS Børnebyerne welcome the opportunity to comment on the draft Strategic Framework for Denmark's partnership with Ukraine. We applaud the significant assistance Denmark is offering to the recovery of Ukraine and as leading children's organisations engaged in Ukraine we would like to draw attention to a few areas where we recommend a further strengthening of the framework. We will in particular point to the areas of education and de-institutionalisation and the importance of a systematic focus on the needs and the inclusion of children, adolescents and young people.

VULNERABLE GROUPS

We note that under section: "2. Analysis of the Context, challenges, and risks", children are mentioned as one of the various vulnerable groups in Ukraine. Red Barnet and SOS Børnebyerne would like to stress that children are an especially vulnerable group due to numerous factors (see below text).

Page 9 Social Cohesion and Vulnerable Group

We would like to include the paragraph below on children and youth to highlight that:

Women in the East are more at risk than anywhere else in Ukraine, of psychological, economic, physical and sexual violence exacerbating the pre-war situation. Ukraine's internal affairs ministry reported a 20 per cent increase in cases of domestic violence from 2022 to 2023.

More than a thousand days of relentless destruction and displacement have also severely impacted children and youth in Ukraine. They face violence, separation from family and friends, and significant disruptions in education, healthcare, and social services. Despite their resilience, the war has robbed many of long periods without social interaction, play and education, leading to a mental health crisis and a learning crisis among Ukraine's younger generation.

EDUCATION

We appreciate the focus on the educational sector and would like to emphasize that investments in infrastructure such as school repairs and rehab must be accompanied by soft components addressing learning losses, teaching capacities and MHPSS needs impacting children. Critical education support includes providing safe education facilities and shelters to enable a safe return to in-person learning as well as provision of required equipment, furniture, and materials, but it also includes scaling catch-up classes, training of teachers and other education personnel in MHPSS explosive ordnance risk education, and child protection referral mechanisms. The latter will be as critical as education infrastructure investments to address the short- and long-term needs.

Page 17 - 4.1 Strategic Goal 1

We recommend adding **SDG 4 (Inclusive and equitable quality education)**

Page 17 - Basic humanitarian needs of the most vulnerable people are met – based on continued needs assessments

We recommend including a specific focus on education, e.g; *To date, this has meant a particular focus on basic needs, hard-to-reach areas and the protection of vulnerable groups, including women, children/youth, people with disabilities, internally displaced people and returnees. Delivery of lifesaving aid will include support for education and mental health services.*

Page 17 - Basic energy and water supply

We recommend specifying the need for a focus on education, e.g,*To the extent possible, the immediate re-establishment of the necessary basic infrastructure, including education services and facilities,*

Page 18 - People traumatised by war

We recommend including the following: *Denmark will continue to support access for conflict-affected parts of the population to adequate health services with a specific focus on mental health care, psychosocial support and other individualised assistance, including survivors of war crimes, SGBV and other forms of torture and ill-treatment. Support will also include training of teachers and other education personnel in mental health and psychosocial support, including psychological first aid, teacher wellbeing, explosive ordnance risk education, catch-up learning and child protection referral mechanisms. Additionally, Denmark will...*

Page 19 – Local conflict management

We recommend including the following:*Locally-anchored, lasting peace requires meaningful inclusion of the local population groups, including especially women and young people, in the peace and security initiatives, as well as education initiatives that support peacebuilding and enhance social cohesion, such as teaching conflict resolution skills and addressing bullying and social discrimination faced by children, adolescents and youth.*

Page 19 - 4.2 Strategic Goal 2

We recommend including **SDG 4 (Inclusive and equitable quality education)**

Page 21 - 4.3 Strategic Goal 3

We recommend including:

Strategic goal 3: *to support reforms and strengthen Ukraine's democratic institutions and processes, whereby also meeting the criteria for joining the EU. This includes combating corruption and strengthening democratic accountability institutions; upholding human rights, reform of the child-care sector, maintaining an ...*

We recommend including **SDG 4 (Inclusive and equitable quality education)**

And the text below:

It is important that the Government of Ukraine reform the childcare sector with a focus on de-institutionalization and foster care to bring Ukraine in line with European standard, for Ukraine's accession to the EU.

The war in Ukraine has been especially devastating for the children, already in vulnerable situations, including children without parental care, children with disabilities, children at risk of family separation, those residing in residential institutions, as well as those who have been evacuated from such institutions during the war. Ukraine already had the highest number of children in institutional care across Europe prior to the war with over 90,000 living in institutions, orphanages, and other care facilities. Nearly half of them children with disabilities.

Page 23 – Paragraph: In Ukraine, civil society actors

We recommend including the following:*Efforts will be strengthened to engage with civil society at local levels and enhance coordination between organisations and across local, regional and national levels. Capacity building for civil society organisations, including local education partners, in inclusion, equity and conflict sensitivity will be critical...*

Page 24 - Protecting and promoting human rights...

We recommend including the following;*In addition, Denmark will also contribute to strengthening relevant public authorities working for related policy development and legislation. This is an effort that is closely related to the reform work necessary to live up to the conditions of EU membership.*

The Government of Ukraine must reform the child protection and child-care sector with a focus on de-institutionalization and foster care to bring Ukraine in line with European standards, for Ukraine's accession to the EU.

The war in Ukraine has been especially devastating for children, already in vulnerable situations, including children without parental care, children with disabilities, children at risk of family separation, those residing in residential institutions, as well as those who have been evacuated from such institutions during the war.

Page 37 - 8.2.1 Strengthening capacity to meet the urgent

We suggest including the following: *....This will include needs and gap analyses as well as targeted capacity building and support for the development of appropriate systems and procedures. Capacity building for local authorities, including education authorities, in inclusion, equity and conflict sensitivity will be critical...*

Page 38-39 - 8.2.2 Reconstruction of social infrastructure

We recommend to include the following: *.....Restoration of schools/classrooms, kindergartens, bomb shelters and health facilities – and electricity, heat and water supply to the same facilities, to the extent possible based on renewable or energy-efficient solutions. Restoration will include provision of required equipment, furniture, and materials for classrooms and digital learning centres, as well as learning/teaching and ECCD kits, and electronic devices. Support to catch-up/accelerated learning opportunities and support programmes for teachers will also be provided...*

Page 40 - 8.2.4 Support to health and rehabilitation

We recommend adding the following: *...A specific effort will be done to offer support for young people and children. Activities might, based on updated analysis of needs, include:*

- *Assistance to local education authorities and training institutes to support the training of teachers and other education personnel in mental health and psychosocial support (MHPSS), including PFA, teacher wellbeing, SEL, CSE, trauma-aware pedagogy, explosive ordnance risk education, catch-up learning and child protection referral mechanisms.*

CHILDREN, ADOLESCENTS AND YOUTH

We appreciate the already included focus on the needs and the important role of young people. In the following, we point to a few areas where this focus may be strengthened.

Page 10 - Paragraph: Vulnerable population groups.

We recommend including adolescents as a particularly vulnerable group, affected by isolation, lack of schooling and the responsibilities expected of them when they are still children and developing their brains.

Page 10 - Civil Society

We recommend adding the important role of women-led and youth-led civil society actors in the response and reconstruction, eg: *"The role of young people and women civil society actors have been critical in the response and reconstruction."*

Page 17 - Strategic goal 1.

We recommend including young people as a group that should be included, e.g; *..... with a focus on broad participation by the local population, including women, young people, the internally displaced, and veterans aiming at furthering social cohesion and peacebuilding.*

Page 18-19 - Local conflict management

We recommend emphasising the importance of including children, adolescents and young people, e.g; *Local conflict management capacities and structures are strengthened with a focus on inclusive and meaningful participation by the local population, including women, internally displaced persons, children, adolescents and youth and veterans aiming at furthering social cohesion and peacebuilding.*

Locally-anchored, lasting peace requires meaningful inclusion of the local population groups, including especially women and young people, in the peace and security initiatives. This is aligned with Denmark's new National Action Plan for Women, Peace and Security (WPS), 2025 – 2029, and with Denmark's support for [UN Security Council Resolution 2250 \(UNSCR2250\) on Youth, Peace and Security](#). Ukrainian women and young people remain well-positioned to support the war effort and recovery planning. Women and young people's expertise will be a vital resource for the reconstruction and building back better process, as well as in possible peace negotiations.

Page 22 - Fighting corruption and strengthening democratic accountability institutions

We recommend emphasising the inclusion of young people, e.g;
.... In this regard Denmark recognises the importance of ensuring the full, equal and meaningful participation of women, young people and marginalized groups in these decision-making processes and institutions.

Page 23 - Protecting and promoting human rights, gender equality and an inclusive society with respect for diversity

We recommend emphasising the specific challenges of children, adolescents and young people, e.g;

Protecting and promoting human rights, children's rights, gender equality and an inclusive society with respect for diversity...

....Human rights and gender equality are key priority areas and cross-cutting issues in Denmark's support to Ukraine. Denmark recognizes the particular challenges women, children, adolescents, youth and marginalized groups, including people living with disabilities, face in times of crisis and conflict. Denmark will seek to strengthen women's organisations and organisations working for gender equality and inclusion, including organisations representing marginalised population groups, organisations supporting services for children, adolescents and youth (including education and mental health services), and organisations promoting people living with disabilities.

Page 25 - 5.2 Humanitarian Assistance, Ukraine

We recommend including adolescents among the specifically vulnerable groups, e.g;protection of vulnerable groups such as women, children, adolescents, people with disabilities, internally displaced people and returnees. The humanitarian assistance is channelled through trusted, long-term international and Danish humanitarian partners, such as the UN, the Red Cross Movement, Danish civil society organisations and their local partners.

Page 37 - 8.2 Focus area 1

We recommend to include adolescents:Support to health and rehabilitation, with focus on mental health support programmes targeting people traumatised by war, including veterans, IDPs, children, adolescents and youth and people suffering for GBV.

Page 38-39 - 8.2.2 Reconstruction of social infrastructure

We recommend including adolescents and young people, e.g; In prioritization of activities an important criterion will be to target the most vulnerable (including IDP's, people with disabilities, children, adolescents and young people, single parents, and veterans).