

SERVICE HOUSING IN UKRAINE

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CONTENTS

I. EXECUTIVE SUMMARY	4
II. METHODOLOGY	6
III. DEPARTMENTAL HOUSING FUND	7
IV. SERVICE HOUSING IN THE CURRENT LEGAL ENVIRONMENT OF UKRAINE	10
V. INTERNATIONAL PRACTICES FOR PROVIDING SERVICE HOUSING	14
VI. RESULTS OF PROCESSING INFORMATION ON THE USE OF SERVICE HOUSING BY EMPLOYEES OF THE JUDICIAL SYSTEM OF UKRAINE	24
VII. REFORMING THE SERVICE HOUSING MECHANISM IN THE CONTEXT OF THE CURRENT HOUSING REFORM IN UKRAINE	26
VIII. CONCLUSIONS AND RECOMMENDATIONS	30
APPENDIX	33

I. EXECUTIVE SUMMARY

In the context of reforming Ukraine's housing policy, the issue of service housing and its legal status is becoming extremely important. Service housing should function as an effective social mechanism for providing housing for employees of the public sector, municipal enterprises, educational and medical institutions, especially in areas with high professional mobility or specific working conditions. In the context of martial law and large-scale migration processes, most local communities are experiencing an acute shortage of qualified specialists, so the problem of "staff shortages" at the local level could be solved through the implementation of a modern model of service housing.

The concept of departmental housing stock and service housing has deep historical roots dating back to the Soviet era. During that historical period, housing policy was based on the principle of a state monopoly on housing, which was provided to citizens not as property but as temporary use. The actual owners of the majority of residential properties were state-owned enterprises, institutions and organisations, which formed the structure of the departmental housing fund. Within this fund, a certain category of residential premises was classified as service housing with temporary use and direct dependence on the professional status of the employee. At the same time, other residential properties, although belonging to the same fund, did not have the special status of service housing and could be transferred for use under general regulatory provisions.

Service housing is not an autonomous category of the housing fund, but represents a special legal regime for a specific residential property, which determines the temporary nature of its use. The procedure for granting it is clearly regulated by legislative norms and is directly related to the employee's labour relations with a specific institution. This model of housing provision entails significant restrictions on the legal status of the user, in particular the inability to privatise or use the property on a long-term basis after the termination of labour relations.

After declaring independence, Ukraine began a gradual transition to a market model of housing sector management. However, a significant number of state and municipal enterprises continue to maintain departmental housing funds. Moreover, the Soviet institutional legacy with its centralised housing allocation mechanisms still has a significant impact on both the regulatory framework and the social expectations of the population, including a strong belief in the possibility of obtaining housing free of charge.

According to Article 118 [of the Housing Code of Ukraine](#), **service housing** is defined as premises provided to an employee in connection with the specific nature of their professional activities, which require them to live at the place of performance of their official duties. Such housing is subject to a specific legal regime: it is not subject to privatisation, must be vacated upon termination of employment, and is provided exclusively on the condition of corresponding workloads. The departmental housing fund, in accordance with Articles 5, 10 and 130 of the Housing Code of Ukraine, is an integrated set of residential properties under the jurisdiction of ministries, departments and state-owned enterprises. This fund includes both premises with official status and general-purpose housing.

In the current situation, there is a negative trend towards the "de-servicing" of service housing, i.e. its privatisation, as a result of which the mechanism for obtaining service

housing is being transformed into a way of acquiring housing free of charge, and not always by those categories of citizens who objectively need such support.

In view of the prospect of reforming housing legislation, especially in terms of establishing fair mechanisms for resolving the housing issues of socially vulnerable categories of citizens, there is an objective need for a comprehensive analysis of the evolution of the institution of service housing.

The purpose of this study is to conduct a systematic analysis of historical approaches to the formation and functioning of service housing, Ukrainian and international experience in this area, identify key problem areas, and develop conceptual directions for improving the current regulatory framework.

II. METHODOLOGY

This study is based on a comprehensive methodological approach that integrates various analytical tools and sources of information to ensure a comprehensive analysis of the issues surrounding service housing in Ukraine.

The information base of the study consists of:

- regulatory and legal acts of Ukraine (current legislation and draft acts);
- international documents and studies (including regulations, provisions and analytical documents on official housing in Germany, the United States, Poland and the United Kingdom);
- expert opinions and working group materials (analytical materials from expert groups on the development of new housing legislation, recommendations from international consultants on housing reform, minutes of working group meetings on the preparation of the draft Law of Ukraine "On the Basic Principles of Housing Policy");
- empirical data (responses to requests for public information received from judicial authorities).

A set of complementary scientific methods was used in the research process:

- comparative legal analysis (comparison of current Ukrainian legislation with draft new regulatory acts in the field of housing policy, comparison of the Ukrainian model of service housing with international analogues);
- system analysis (consideration of service housing as an interconnected system of elements in the context of general housing policy);
- historical method (research into the evolution of the institution of service housing from the Soviet period to the present day, study of the influence of historical factors on the formation of modern approaches to service housing);
- statistical analysis (collection and processing of quantitative data on existing service housing for employees of the judicial system);
- content analysis (identification of typical problems and trends in the field of service housing, assessment of the level of transparency and openness of information about service housing);
- expert survey (consultations with specialists in the field of housing policy).

The use of a comprehensive methodological approach made it possible to thoroughly investigate the issue of official housing in Ukraine, identify key problems and formulate sound recommendations for improving the system, taking into account international experience and current challenges.

III. DEPARTMENTAL HOUSING FUND

In the Soviet Union, service housing functioned as a fundamental component of the state housing strategy, particularly for representatives of such critically important professions as military personnel, educators, medical workers, and miners. Despite the fact that obtaining such housing was accompanied by significant restrictions on property rights, for a significant portion of citizens it remained the only real opportunity to solve their housing problems.

Any study of Ukraine's current housing policy must begin with an analysis of its historical roots, which are determined by three key factors:

- the regulatory and legal aspect: Ukrainian society continues to live under the Housing Code adopted in 1983 and numerous regulations formed in the context of Soviet ideology. In fact, Ukraine's state housing policy remains a legacy of the Soviet era to this day;
- material and infrastructure aspect: the vast majority of the existing housing infrastructure was built during the Soviet Union;
- Social and mental aspect: a significant segment of the population, primarily citizens of retirement age, live in housing obtained free of charge during the Soviet era, which shapes a worldview characteristic of a planned rather than a market economy – the belief that the state is "obligated" to provide citizens with free housing.

With the formation of the USSR in the 1920s, a systematic process of transforming traditional housing on fundamentally anti-market principles began. The ideological foundation of the new anti-capitalist housing policy was based on the categorical rejection of private ownership of residential real estate and land plots. The strategic concept envisaged the construction of collective living, where individual housing functions gave way to communal spaces – collective canteens, libraries, sports complexes and children's clubs. The central idea was that housing should not function as a market commodity; it was transformed into an instrument of centralised state distribution and a mechanism of political influence.

All housing resources were subject to centralised control: ownership of flats in multi-family residential complexes belonged exclusively to the state, with the exception of certain cooperative forms. The economic system operated on a planned basis, and housing construction and infrastructure maintenance were provided by state-owned enterprises. These enterprises were responsible for the functioning of schools, hospitals, preschools, sanatoriums, and rest homes, i.e., facilities that still form a significant part of Ukraine's infrastructure landscape today.

Part one of Article 5 of the Housing Code of the Ukrainian SSR, as amended on 1 January 1984, stipulated: "The state housing fund is under the jurisdiction of local councils of people's deputies (local council housing fund) and under the jurisdiction of ministries, state committees and departments (departmental housing fund)". The current version of parts one and two of Article 5 of the Housing Code of Ukraine formulates this provision as follows: "The state housing fund is under the jurisdiction of local councils (local council housing fund) and under the jurisdiction of ministries, state committees and departments (departmental housing fund). In accordance with Ukrainian legislation, buildings belonging to the departmental housing fund in cities and urban-type settlements are subject to gradual

transfer to the jurisdiction of local councils in the manner and within the time limits determined by the Cabinet of Ministers of Ukraine."

This raises questions about the reasons for such legal succession and about the current status and functional purpose of the "departmental housing stock".

Ukraine's independence and its declaration of a course towards a market economy led to a fundamental transformation of the entire complex of legal relations related to the right of ownership, possession, use and disposal of housing.

The severance of economic ties with the former Soviet republics and the implementation of new market mechanisms in the first half of the 1990s led to a large-scale reorganisation and liquidation of numerous state-owned enterprises that maintained their own "departmental housing stock". This process became particularly intense after the adoption of [the Law of Ukraine "On the Transfer of State and Municipal Property"](#) in 1998. The legislative act stipulated that the transfer to communal ownership of territorial communities of housing stock and social and cultural facilities that were under the full economic management or operational control of state-owned enterprises should be carried out in accordance with the requirements of the Laws of Ukraine ["On the Privatisation of State Housing Stock," "On Privatisation of State Property"](#) and other regulations governing the transfer of such objects.

State-owned enterprises, either directly or through specialised housing management organisations they had established, were obliged to ensure the transfer of these objects to the jurisdiction of local self-government bodies. At the same time, individuals who actually lived in departmental housing on the basis of orders received a legally enshrined right to privatise the state housing fund, i.e. apartments in multi-apartment buildings, which allowed them to acquire the status of full owners.

After the transfer of such housing stock to municipal ownership, the relevant buildings had to be placed on the balance sheet of the relevant municipal enterprises designated by the local government in order to create the appropriate legal basis for their accounting and maintenance.

However, practice showed that not all such objects were actually transferred to communal ownership. There were also cases when, despite the absence of legally formalised ownership rights, local authorities still put certain residential objects on the balance sheet, especially under pressure from the social demands of the residents of the relevant buildings. In fact, a significant number of such buildings found themselves in a legal vacuum, abandoned by their previous owners (state-owned enterprises, agencies) as a result of their liquidation, but not properly taken over by other entities.

A significant proportion of departmental apartment buildings were not taken over by local authorities after 1991. The reasons for this phenomenon can be systematised according to the following key factors:

- social and personnel factors: in many cases, local government representatives demonstrated insufficient initiative and responsibility in resolving issues related to the transfer of the housing stock. This was often due to the lack of a strategic economic approach and the desire to avoid additional administrative responsibilities and management difficulties associated with making such decisions;

- economic and financial aspects: local authorities systematically avoided accepting housing facilities into municipal ownership because they were aware of the inevitability of significant additional budgetary expenditures for their maintenance, current and capital repairs, as well as expenses related to the preparation of technical documentation for buildings and corresponding land plots.

For decades, many residential properties were formally on the balance sheets of enterprises that had already ceased to exist or for which housing maintenance was a non-core function. Writing off such properties from the balance sheet allowed these enterprises to be relieved of a burdensome and formal responsibility. In accordance with [the Law of Ukraine "On the Peculiarities of Exercising Property Rights in Multi-Apartment Buildings,"](#) from 01.07.2016, full responsibility for the maintenance of multi-apartment buildings was transferred to their co-owners. In accordance with this and other legislative acts, buildings were subject to write-off from the balance sheets of former balance sheet holders, ministries, other central executive bodies, local self-government bodies, state and municipal enterprises, and other organisations. To implement this provision in practice, the Cabinet of Ministers of Ukraine adopted [a resolution "On Approval of the Procedure for Writing Off Multi-Apartment Buildings from the Balance Sheet."](#) After the write-off procedure, residents were given the opportunity to either create an association of co-owners of a multi-apartment building (OSBB) or choose a professional manager. This was intended to ensure an effective system of joint property management and proper maintenance of the housing stock. The maintenance of multi-apartment buildings required significant financial resources, which the state could no longer or was unwilling to provide. Writing off buildings from the balance sheet significantly reduced the burden on local budgets. The transition to a market-based economic model required fundamental changes in the housing management system, with a model of self-management by co-owners replacing state paternalism.

Thus, even those local authorities that had actually taken certain residential properties onto their balance sheets (if the housing was not legally owned by the municipality) were obliged to write off this property from their balance sheets. In practice, a significant number of flats in multi-family buildings and rooms in dormitories have been formed, which today are in a kind of "legal vacuum", effectively having the status of ownerless property. Local authorities often do not have complete information about the existence of such property, i.e. these objects remain unidentified. It is practically impossible to objectively assess the number of such objects today.

IV. OFFICIAL HOUSING IN THE CURRENT LEGAL FRAMEWORK OF UKRAINE

The legislative framework governing service housing in Ukraine is characterised by a multi-level structure and considerable fragmentation.

The fundamental document remains the 1983 Housing Code, which, despite its archaic nature, continues to function in Ukraine's legal framework, preserving numerous anachronisms of Soviet housing policy at the legislative level. This creates significant legal conflicts and forms the basis for potential abuses.

According to Article 118 of the Housing Code of Ukraine, service housing is intended for citizens who, due to the specific nature of their work, must live at or in close proximity to their place of work.

Articles 118-122 of the Code regulate in detail the categories of persons who are entitled to official housing, the procedure for moving in and the rules for using such premises.

As a general rule, a person who has terminated their employment relationship with the organisation that provided the service accommodation is obliged to vacate the premises together with all persons living with them, without being provided with alternative accommodation. However, the Housing Code establishes privileged categories of citizens who cannot be evicted from service accommodation without being provided with other residential premises. These categories include: persons with disabilities as a result of war, combatants, families of deceased military personnel, employees with more than 10 years of service at the enterprise, persons of retirement age, single persons with minor children, and other socially vulnerable groups. According to Articles 125 and 126 of the Housing Code, such citizens must be provided with alternative housing. However, due to the lack of suitable housing stock for resettlement, in practice these persons often continue to occupy service housing for an indefinite period.

The list of categories of employees who are entitled to official housing, as well as the detailed procedure for providing and using such premises, are defined by the Regulations approved by [Resolution of the Council of Ministers of the Ukrainian SSR No. 37 of 4 February 1988](#) (with the latest amendments in 2025). Today, 70 different categories of employees and civil servants are eligible for official housing.

Service housing is indeed a critically important tool for supporting and developing the human resources potential of state authorities, local self-government bodies and other institutions, especially in the context of a shortage of specialists in certain fields in specific regions and intensive internal migration processes caused by the ongoing war.

In parallel with national regulations, various central executive bodies and departments are developing and implementing their own internal regulations governing specific aspects of the provision of official housing to their employees.

Among such documents, the following can be highlighted:

- [Regulations on the procedure for providing and using official housing in the State Tax Service of Ukraine and its territorial bodies, approved by Order of the Ministry of Finance No. 338 of 10 June 2021;](#)

- [Regulations on the procedure for providing and using service accommodation at the National Academy of Sciences of Ukraine and institutions, organisations and enterprises under the jurisdiction of the NAS of Ukraine, approved by Resolution of the Presidium of the NAS of Ukraine and the Central Committee of the Trade Union of Employees of the NAS of Ukraine No. 141 dated 31 May 2017;](#)
- [Regulations on the procedure for providing and using service accommodation in the prosecutor's office and Regulations on housing and domestic commissions in the prosecutor's office, approved by Order of the Prosecutor General dated 17 July 2020 No. 323;](#)
- [Procedure for providing military personnel and their families with housing, approved by Resolution of the Cabinet of Ministers of Ukraine No. 1081 of 3 August 2006.](#)

Local authorities are also actively developing and approving their own regulations on official housing, adapted to local needs and capabilities. For example:

- [Procedure for providing service housing to medical workers of the Petropavlivka Village Council \(Dnipropetrovsk region\), which aims to provide housing for medical workers with higher education;](#)
- [Regulations on service housing of the Martynivska Village Council \(Poltava region\), which provides for the purchase of housing for teachers, medical workers and other specialists of the territorial community for the duration of their official duties;](#)
- [Regulations on the procedure for providing official housing to the Slobozhanskyi settlement territorial community \(Dnipropetrovsk region\), which regulates the provision of housing to local government officials, employees of municipal institutions and enterprises who do not have their own housing in the community.](#)

Conceptually, the system of providing employees with official housing remains an effective motivational tool which, despite certain vestiges of the Soviet era and contemporary problematic aspects, represents a relatively transparent mechanism for supporting specialists in whom territorial communities, enterprises, institutions and organisations are interested.

The process of providing service housing is structured in the form of sequential stages:

- initiation of the process by the employee submitting an application to the relevant body of the enterprise, institution or organisation where they work;
- consideration of the submitted application by the competent body of the organisation, with an analysis of the availability of vacant service housing and the adoption of a reasoned decision;
- if the application is approved, an order is drawn up and issued, followed by the conclusion of a contract for the use of official housing;
- granting the employee the right to move into and use the accommodation for the period of their employment;

- upon termination of the employment relationship with the employer, the employee is obliged to vacate the occupied residential premises together with all persons living with him, without being provided with alternative housing.

Given that in European practice the concept of official housing is most often associated with the provision of housing for military personnel, it is worth considering in more detail the existing mechanism for providing official housing to this category of citizens.

According to the Procedure for providing military personnel and their families with housing, approved by Resolution of the Cabinet of Ministers of Ukraine No. 1081 of 03.08.2006:

- military personnel and their families are provided with service accommodation that meets the requirements of housing legislation. In the absence of such accommodation, unmarried military personnel are housed free of charge in specially adapted barracks located at the military unit, and married personnel are housed in family dormitories;
- military officers who are serving in the military on conscription and are not married, in the absence of official accommodation, are housed in dormitories intended for single citizens, and those with families are housed in family dormitories;
- if it is not possible to accommodate military personnel in specially adapted barracks at the military unit's location or in dormitories (family dormitories), the military unit shall rent accommodation or, at the request of the military personnel, pay them monetary compensation for subletting (rent) of residential premises in accordance with the Procedure for the payment of monetary compensation to military personnel of the Armed Forces, National Guard, Security Service, intelligence agencies, State Border Service, State Special Communications and Information Protection Service, and State Special Transport Service for subletting (rental) of residential premises, approved by the Resolution of the Cabinet of Ministers of Ukraine dated 26 June 2013 № 450¹.

Residential premises are included in the list of service premises in accordance with the decision of the executive body of the district, city, or city district council at the request of the garrison commander, military unit commander, agreed with the housing and maintenance authority.

Residential premises are excluded from the list of service premises by decision of the executive body of the district, city, or district council in the city based on a request from the garrison commander in cases where there is no longer a need to use them as service premises, or if they have been excluded from the category of residential premises in accordance with the established procedure.

Despite the existence of clear regulatory provisions, the practical implementation of the mechanism for providing service housing faces numerous problems.

¹ [Procedure for the payment of monetary compensation to servicemen of the Armed Forces, National Guard, Security Service, intelligence agencies, State Border Service, State Service for Special Communications and Information Protection, and State Special Transport Service for the sublease \(rental\) of residential premises, approved by Resolution of the Cabinet of Ministers of Ukraine No. 450 of 26 June 2013](#)

The main problematic aspects of the functioning of the service housing system include:

- the lack of a centralised system for accounting and monitoring the service housing stock;
- insufficient control over the distribution and provision of housing, which creates a basis for abuse of the "service" status for the purpose of further privatisation.

The amount of municipal and state-owned service housing is quite limited, and in conditions of insufficient supply, the risks of abuse increase significantly. According to Resolution No. 37, in cases where the number of service housing premises is insufficient to provide for all employees of the relevant categories, such premises are allocated taking into account the interests of ensuring the normal functioning of the enterprise, institution or organisation. However, it is practically impossible to objectively assess whether the normal activities of an organisation can be ensured without a specific employee. In such a situation, a mechanism of social justice should be in place, which assumes that an employee with a sufficient level of income has the financial capacity to resolve the housing issue independently. This is particularly relevant for the public sector and local government bodies.

In theory, after the termination of employment, the organisation has the right to provide the vacated service housing to a new employee. However, in practice, the situation often develops differently. Often, the so-called "de-service" of housing occurs, followed by its privatisation, which makes it impossible to use this housing resource to attract new specialists.

The question arises: how is this possible if the Law "On Privatisation of the State Housing Fund" expressly prohibits the privatisation of official housing? The answer lies in the legislative possibility of changing the status of housing. Although the privatisation of official housing is prohibited, housing that has lost its official status can already be privatised.

Resolution No. 37 stipulates that residential premises may be excluded from the category of service housing if there is no longer a need for such use or if it is excluded from the list of residential premises in accordance with the established procedure. The exclusion is carried out on the basis of a request from the organisation by decision of the executive committee of the relevant local council. After such an exclusion, a corresponding note is made in the register of service housing.

Thus, an employee who, while performing official duties, received income that actually allowed him to purchase his own housing, or even already owned residential properties, has the opportunity to privatise official housing after changing its status. As a result, housing intended to meet official needs is unlawfully transferred to private ownership.

Abuse in the area of official housing is a serious systemic problem in Ukraine that requires increased attention from law enforcement and anti-corruption agencies. The unfair distribution of housing resources not only violates the rights of citizens, but also undermines trust in state institutions. The institution of service housing needs comprehensive improvement, in particular through the introduction of transparent distribution mechanisms and an unambiguous ban on the privatisation of such housing.

Without an effective solution to these problems, the official housing system will not be able to fully perform its social function and will remain vulnerable to corruption.

V. INTERNATIONAL PRACTICES FOR PROVIDING OFFICIAL HOUSING

Staff housing as a social policy tool plays an important role in many countries around the world. It functions as an effective mechanism for supporting employees who perform strategically important public functions, primarily in the areas of national defence, education, health care and public safety. The models for implementing this mechanism differ significantly from the Ukrainian concept of official housing, but they all aim to achieve a common goal: to meet the basic housing needs of employees, reduce their financial burden and increase their social security.

It should be noted that service housing as a specific category with a clearly defined legal status, restrictions on use and a direct link to the position, which is characteristic of the Ukrainian model, is largely absent in European Union countries. Instead, there is a more complex and diversified system of social housing or various housing subsidies and compensation mechanisms.

Germany

Germany has a comprehensive system for providing housing to public sector employees, which reflects the overall effectiveness of the German approach to public property management.

Given Germany's membership in NATO and the permanent deployment of foreign military contingents on its territory, there is a need to provide appropriate accommodation for both foreign military personnel and representatives of the national armed forces.

The Federal Agency for Real Estate ([Bundesanstalt für Immobilienaufgaben](#), BImA) plays a key role in this process. It is a specialised institution that provides both foreign military forces and the German federal armed forces with the necessary buildings and land. The BImA accomplishes this task in two main ways: through the direct acquisition of real estate or through leasing from private and institutional owners.

The centralised programme for providing federal civil servants with housing, *Wohnungsfürsorge des Bundes*, deserves special attention. This programme has a clearly defined goal: to provide affordable housing in close proximity to the place of work. On 1 September 2019, the programme's management was reorganised: strategic management is now carried out by the Federal Ministry of Finance, while the practical implementation of the programme is entrusted to the BImA.

Today, it has more than 62,000 apartments at its disposal, located in more than 500 locations throughout Germany. Such an extensive network of residential properties makes it possible to effectively meet the housing needs of federal employees in different regions of the country.

The existing housing stock under the programme includes:

- BImA's own flats, which are state property;
- residential properties owned by private owners, but with guaranteed occupancy rights for the state (Belegungsrechte).

The following are eligible for housing through BImA:

- federal employees (current and trainees);
- federal judges;
- Bundeswehr military personnel (except volunteers and reservists);
- employees under employment contracts whose institutions are more than 50% funded by the German budget;
- temporary employees, including apprentices during vocational training;
- discharged military personnel who continue to receive payments under the Military Service Compensation Act;
- former employees and dependents, provided they have pension rights;
- civil servants, officials or employees working at the level of the German federal states, i.e. regional (not federal) level of government, and representatives of allied armies with lower priority in the event of relevant intergovernmental agreements.

Unlike most European countries, where housing policy focuses primarily on the development of social housing for vulnerable groups, Germany has implemented a comprehensive state housing programme specifically for civil servants. The housing model implemented by the Federal Agency for Real Estate (BImA) is an example of effective management of the official housing stock through a centralised state structure.

Compared to the Ukrainian system, where the allocation of service housing is fragmented, often through various local authorities or sectoral ministries, Germany has created a single institutional mechanism that provides:

- consolidated control over the state housing stock;
- an optimised and transparent allocation and occupancy procedure;
- flexible adaptation to the professional mobility of civil servants.

Key principles of the German model:

- housing is not transferred to the ownership of civil servants, but is provided exclusively for use during the period of service;
- allocation is based on a formalised application system, taking into account the category of civil servant, place of service and objective needs;
- priority for housing is given to employees who are moving to a new place of service, do not have permanent housing at their destination, or work in the field of national security.

The BImA has the legally established right to set the rent for its residential properties at the lower limit of the rent index (Mietspiegel) of the respective municipality. For "cold rent" (excluding utilities), a maximum limit of €10 per square metre has been set. Exceeding this limit is only permitted in exceptional cases. The difference is particularly noticeable in large cities such as Berlin and Munich, where the rents set by BImA are significantly lower than the market average. This rental policy not only ensures the availability of housing for civil

servants, but also has a stabilising effect on local real estate markets, benefiting both the general public and municipal authorities.

The housing allocation process is implemented through BImA's regional offices. Information on apartments available for rent is published on a specialised state online real estate portal, where users can search for housing according to individual criteria such as size, region and type of housing. An important feature of the system is that each vacant flat is available exclusively to persons who have a legally established right to housing for a period of four weeks. If no applications are received from authorised persons during this period, BImA has the right to offer such flats for rent on general terms. In parallel with publication on the portal, information about available properties is actively disseminated by federal ministries among their employees.

After receiving applications, the regional BImA offices conduct an objective selection of candidates from the entire pool of applications. The selection process takes into account both the social circumstances of the applicant and the service requirement, with these criteria being considered on an equal basis. The results of the selection are officially communicated to all applicants in writing after the completion of the established four-week review period.

Comparison of the instruments for implementing the service housing mechanism in Germany and Ukraine

Indicator	Germany	Ukraine
Programme implementer	BImA – Federal Agency for Housing	Local authorities, ministries, state-owned enterprises
Form of provision	Housing for use with preferential rent (up to €10/m ²)	Free of charge
Access mechanism	Via the BImA online portal; submission of application; ranking	Submission of application, decision by housing commission, approval by manager
Possibility transfer ownership	<p>of No, the housing remains</p> <p>to state property</p>	Privatisation is possible, provided that the housing is excluded from the list of service housing
Centralisation the process	of Single operator (BImA), single online portal	Decentralised: each authority/city has its own rules

Programme coverage	62,000 flats in 500+ locations	Very limited housing stock; often a shortage of housing, no information about available housing stock
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Poland

In Poland, the concept of "service housing" (mieszkanie służbowe) is not regulated by a single legislative act, as was previously the case under [the 1962 Prawo lokalo we Act](#), which is no longer in force. Instead, the legal regulation of this issue is distributed among various sectoral regulations covering specific categories of civil servants: military personnel, police officers, border guards, firefighters, forestry workers and representatives of other public professions. It should be noted that until 2019, teachers in settlements with a population of up to 5,000 also had the right to official housing, but this rule has been abolished.

Military personnel in Poland are entitled to housing assistance throughout their term of service in a specific location. The amount of this assistance is calculated as the product of the base rate (300 zlotys) and a coefficient, the value of which depends on the location of the place of service. Today, the amount of housing assistance varies from 630 to 1,800 zlotys.

The right to housing for professional military personnel can be exercised in one of the following forms:

- provision of an apartment or other residential premises;
- provision of a place in a dormitory or other collective accommodation;
- payment of a housing subsidy.

An important feature of the Polish model is that military personnel have the right to choose one of the proposed housing options themselves.

In cases where both spouses are professional military personnel, one of them is entitled to housing in the form of a separate flat or other residential premises, and the other is entitled to housing in the form of a place in a dormitory or housing assistance. If it is not possible to provide a separate flat or other residential premises for objective reasons, the right to housing is exercised in the form of a place in a dormitory or boarding school, or through the payment of housing assistance. Spouses have the right to independently determine the form of exercising their right to housing.

A professional military serviceman loses the right to reside in the city of service in the following cases:

- renting out or allowing free use of assigned housing or other residential premises, absence from residence for more than three months for reasons not related to service;
- use of the residential premises in a manner contrary to the decision on the allocation of housing or its intended purpose, negligent attitude to common use premises;
- gross or systematic violation of the rules of use of the housing, creating obstacles for other residents;

- debt for the use of housing for a period exceeding three months.

A police officer who is on permanent duty is entitled to housing in the city of service or in a neighbouring settlement, provided that the travel time to the place of service does not exceed two hours in both directions. When determining the right to housing, the composition of the police officer's family is also taken into account: spouse, children under the age of 25, as well as parents who are dependent on him.

Housing for police officers is allocated from the housing stock of the Ministry of Internal Affairs. In the event of a violation of the rules for the use of housing or other grounds (conviction for criminal offences, accumulation of debts, unauthorised subletting, etc.), the housing is subject to eviction by administrative decision of the relevant authority. Police officers are also entitled to receive a cash equivalent for the repair of the occupied residential premises, taking into account the number of family members and their rights under specific regulations.

A police officer who has not received residential premises on the basis of an administrative decision on distribution is entitled to financial assistance for the purchase of residential premises in a housing cooperative, a separate house or for the purchase of residential premises that constitute separate property.

A police officer loses the right to live in service accommodation in the following cases:

- subletting or free use of the allocated premises or part thereof;
- use of the residential premises contrary to the terms of the lease agreement or its intended purpose;
- gross or systematic violation of the rules of use of the dwelling;
- arrears in rent or other operating payments for at least two full payment periods;
- receipt of financial assistance for the purchase of own housing;
- transfer to another city with the provision of residential premises in the new place of service;
- waiver of rights to the occupied residential premises;
- conviction by a final court judgment for an intentional crime or intentional financial offence.

Comparison of the tools for implementing the service housing mechanism in Poland and Ukraine

Indicator	Poland	Ukraine
Programme implementer	State sectoral structures (military, police), municipalities, social funds	Local government bodies, ministries, state-owned enterprises

Form of provision	Official housing or monetary compensation	Free of charge
Access mechanism	Submission of a report or application, in accordance with industry standards	Submission of an application, decision of the housing commission, approval by the manager
Possibility transfer ownership	of Housing does not become property, only compensation without the right to privatisation is possible	Privatisation is possible, provided that the housing is excluded from the list of service housing
Centralisation of the process	of In Poland, the process of obtaining service housing is decentralised and is not managed by a single centralised body	Decentralised: each authority/city has its own rules
Programme coverage	Data is only available at the level of departments/enterprises — for example, the needs of the military, police, forestry	Very limited fund; often a shortage of housing, no information on the available fund

United States of America

The system of housing provision for military personnel in the United States of America is characterised by a high degree of flexibility, significant financial support and a focus on monetary compensation. The American model gives military personnel the freedom to choose between living directly on the military base or receiving monetary compensation to independently resolve their housing issues outside of military facilities. The management and control system in the field of housing provision is clearly divided between the relevant ministries and military units.

The central element of housing support for American military personnel is the Basic Allowance for Housing (BAH) programme. The main purpose of this programme is to enable military personnel to live outside military bases at a standard of living comparable to that of the civilian population by providing fair financial assistance to cover a significant portion of their monthly rent and utility costs. BAH is one of the most significant components of the overall compensation package for military personnel, second only to basic pay in terms of volume.

An important feature of the American system is that military housing operators, unlike landlords in the private real estate market, are generally not allowed to set rents that exceed

the established BAH rate. Thus, if a military personnel chooses to live in housing provided by the military, the rent is usually equal to the amount of their BAH.

Service members who prefer to live in private sector housing instead of using military housing can use their BAH to pay for a mortgage or rent on the open market. The system also provides additional flexibility: military personnel are allowed to keep any unused portion of their BAH if their actual housing costs are lower than the amount of assistance received. Conversely, if the cost of the chosen housing exceeds the BAH, the military personnel must cover the difference from other sources of income.

In 2025, the US Department of Defence plans to significantly increase the BAH by 5.4%, reflecting both inflationary processes and the rise in housing costs in the American real estate market. The BAH amount is not fixed for all military personnel, but is determined based on local housing market conditions. To this end, calculations are made for 299 separate residential areas in the United States, using current data from various sources: market analysis materials, information from government agencies, and data collected directly from military bases. The calculation includes average rental and utility costs for six types of housing, differentiated by rank and family status of recipients.

An important element of the system is the partial participation of military personnel themselves in covering housing costs. According to current policy, military personnel independently pay 5% of the total cost of housing. In 2025, this amount ranges from \$90 to \$202 per month, depending on rank and place of service.

One of the key principles of the BAH system is the guarantee of stability: the assistance rate for a particular servicemember cannot be reduced if they continue to serve in the same location. This guarantee is particularly important for protecting the financial interests of those who have entered into long-term leases, even in the event of a decline in prices in the local real estate market.

The American BAH system combines three important characteristics:

- flexible adaptation to regional housing market characteristics;
- balanced involvement of military personnel in partial participation in housing costs;
- ensuring the stability of military personnel's income.

This comprehensive approach makes it possible to maintain the financial attractiveness of military service, ensure adequate housing conditions for military personnel and their families, and make effective use of budget funds allocated for housing.

***Comparison of tools for implementing the service housing mechanism
in the United States and Ukraine***

Indicator	United States	Ukraine
Programme implementer	Ministry of Defence, military housing operators	Local authorities, ministries, state-owned enterprises

Form of provision	Cash compensation for rental costs or state housing	Free of charge
Access mechanism	Submission of a report or application, in accordance with industry standards	Submission of an application, decision in decision of the housing commission, approval by the manager
Possibility transfer ownership	of Housing does not become property	Privatisation is possible, provided that the housing is excluded from the list of service housing
Centralisation the process	of Military departments manage their programmes separately:	Decentralised: each body/city has its own rules
Programme coverage	≈ 1 million military personnel receive BAH; one third — at bases ²	Very limited fund; often a shortage of housing, no information about the available fund

Great Britain

In the United Kingdom, the concept of service accommodation has a clearly defined focus and applies primarily to military personnel in the three main branches of the armed forces: the Army, the Navy and the Air Force. Although certain categories of other public servants, such as police or rescue workers, may also have access to service flats or dormitories, this is not part of a centralised government programme, but is rather implemented through local contracts and agreements.

The official housing system in the United Kingdom is highly centralised and managed by the Ministry of Defence (MOD) through a specialised unit, the Defence Infrastructure Organisation (DIO). The DIO is responsible for the comprehensive administration of housing programmes for military personnel, which include two main areas:

- Service Family Accommodation (SFA) – separate flats and houses for military personnel with families;
- housing for single military personnel (Single Living Accommodation, SLA) – rooms in barracks and dormitories.

The practical management of the housing stock is not carried out directly by state structures, but by private contractors operating under public-private partnership terms through long-term contracts:

² [Report to Congressional Committees. Housing for Service Personnel](#), October 2024

- [Pinnacle Group Ltd](#) - performs the functions of a national housing centre, responsible for processing applications, organising relocation and general administrative support;
- [Amey Community Ltd](#) - provides technical maintenance and management of the housing stock in the northern and central regions of the country;
- [VIVO Defence Services](#) - responsible for maintaining the housing stock in the South and South-West regions.

According to data for 2024, the British Ministry of Defence operated approximately 47,700 units of housing for military personnel with families (SFA) and approximately 100,000 rooms in barracks and dormitories for single military personnel (SLA), which indicates the significant scale of the housing programme.

The application process for service accommodation is optimised and carried out via a special online form. When considering an application, key factors such as the applicant's military rank, family composition and location of deployment or service are taken into account. Housing is allocated according to a clearly defined system of priorities based on the service status of the military personnel.

A key feature of the British model is that service accommodation is not subject to privatisation and remains the property of the state or is used on a long-term lease basis. Servicemen pay subsidised rent, the amount of which is determined by rank and other factors. This payment is automatically deducted from the serviceman's salary, which simplifies administrative procedures and minimises the risk of debt.

Despite its high level of centralisation and structure, the British military housing system faces serious challenges related to the quality of the housing stock. In 2023-2024, the Parliamentary Defence Committee conducted a detailed investigation and published a critical report in which the living conditions in many military housing facilities were described as "shocking". According to the committee's findings, more than two-thirds of the housing stock is in need of major repairs due to a long-standing lack of investment in maintenance and modernisation.

In response to the sharp criticism, the UK government announced a large-scale programme to renovate military housing, promising to invest more than £1.5 billion by 2029. These funds are planned to be used for the comprehensive reconstruction of existing facilities and the construction of new modern housing complexes for military personnel.

The model of providing service housing in the UK is a prime example of a highly centralised approach to solving the housing issue for military personnel. It combines centralised state management through specialised structures of the Ministry of Defence with the delegation of practical functions to private contractors on a contractual basis. A distinctive feature of the British model is its clear focus on a single target group – military personnel – which allows resources to be concentrated and specialised approaches to be developed for providing housing for this category of civil servants.

**Comparison of the tools for implementing the service housing mechanism
in the United Kingdom and Ukraine**

Indicator	United Kingdom	Ukraine
Programme implementer	The main coordinator is <u>the Defence Infrastructure Organisation</u> (DIO), a structural unit of the Ministry of Defence responsible for planning, development and technical management of housing.	Local authorities, ministries, state-owned enterprises
Form of provision	The fee is subsidised and automatically deducted from the servicemember's salary ³ .	Free of charge
Access mechanism	Housing is provided upon electronic application. Allocation is based on service status, rank, family composition and location.	Submission of an application, decision of the housing commission, approval by the manager
Possibility transfer ownership	of Housing does not become to property	Privatisation is possible, provided that the housing is excluded from the list of service housing
Centralisation the process	of Management is centralised through DIO, but maintenance and operation are delegated to private companies.	Decentralised: each body/city has its own rules
Programme coverage	As of 2024, there were: approximately 47,700 SFA units approximately 100,000 SLA rooms ⁴	Very limited stock; often a shortage of housing, no information on available stock

³ [A guide for Service families about applying for, maintaining, moving in and out of and living in UK Service Family Accommodation \(SFA\)](#)

⁴ [Defence Committee/ Service Accommodation/ First Report of Session 2024–25](#)

VI. RESULTS OF PROCESSING INFORMATION ON THE USE OF OFFICIAL HOUSING BY EMPLOYEES OF THE UKRAINIAN JUDICIAL SYSTEM

In order to study the current state of the housing stock used as official housing by employees of the judicial system, including judges, as well as the general trend towards removing such housing from the official housing stock, the Housing Institute prepared and sent to the State Judicial Administration of Ukraine, the territorial administrations of the State Judicial Administration of Ukraine, the Supreme Court, the High Anti-Corruption Court, the High Council of Justice, the High Qualification Commission of Judges of Ukraine, the National School of Judges of Ukraine, the courts of appeal, the district administrative courts, the administrative courts of appeal, the local commercial courts, and the commercial courts of appeal. The request for public information was sent to⁵ . In particular, the following information was requested:

- official housing currently used by judges and other judicial system employees, specifying:
 - location of such housing (city, village, settlement);
 - the position held by the person using such housing (if no longer in that position – the year of dismissal, the grounds for continuing to use the housing);
 - the period during which such accommodation has been used by the relevant person (since which year).
- official housing that has been removed from the list of official housing over the last 10 years (2014-2024), indicating the location of such housing (city, village, settlement), the grounds for removal from the list of official housing;
- information on the level of salaries (salaries and all types of incentive payments) of judicial system employees, including court staff and judges, for the last 5 years.

The Housing Institute sent out a request about how court staff use official housing and got **192 replies**. However, in most cases, the quality of the information provided was unsatisfactory. None of the responses received contained a comprehensive list of the requested information, which indicates systemic problems with accounting, reporting and transparency in the distribution and use of official housing in the judicial system.

Of all the responses received:

- 151 responses (77.8%) contained a refusal to provide information for various reasons or a statement that the requested data was not available;
- only 43 responses (22.2%) contained specific data on the availability of official housing for use by courts or judicial system employees;
- only in 13 cases (6.7%) were facts reported about the removal of housing from the official category during the requested period.

Key issues identified:

- Insufficient level of transparency and openness

⁵ In accordance with [the Law of Ukraine "On Access to Public Information"](#)

Transparency in the use of state- or municipally-owned housing stock, including official housing, is critical for: preventing abuse in the distribution of housing; preventing the illegal acquisition of state property into private ownership; ensuring equal access to housing solutions.

The small number of substantive responses (only 22.2% of the total) indicates that the issue of the use of service housing in the judicial system is effectively beyond effective public control. The refusal to provide information or statements about its absence in 77.8% of responses cast doubt on the transparency of the management of property, which is an important social resource. Without access to such information, it is impossible to control the validity of the provision of housing and the terms of its use.

- Insufficient systematic accounting and lack of clear regulations

Proper accounting of housing used as official accommodation and transparent mechanisms for providing such housing are key to preventing situations where official accommodation becomes a tool for illicit enrichment.

An analysis of the responses received showed that none of them contained the full scope of the requested information. Most of the responses are fragmentary, indicating a lack of systematic accounting of data on the use of official housing in the judicial system.

Of particular concern is the situation with the recording of cases of housing being removed from the official category. The recording and publicity of such decisions makes it possible to assess the legality of acquiring the right to privatisation and compliance with the principle of fairness in the distribution of state property. However, only 13 cases (6.7%) of housing being removed from the official housing category have been reported over the last 10 years, which may indicate that information is being concealed or that there is a lack of proper accounting.

- The need for legislative regulation

Clear legislative regulation is a necessary condition for minimising corruption risks and ensuring the fair use of state- and municipally-owned housing stock. The situation identified points to an urgent need to amend the current legislation to regulate: the procedure for using official housing; the system of accounting and reporting on the official housing stock; mechanisms for public control over the processes of providing and using official housing; procedures for removing housing from the official category and criteria for making such decisions.

The results of processing responses to the request regarding the use of official housing in the Ukrainian judicial system revealed significant systemic problems that require a comprehensive solution. Lack of transparency, inadequate accounting and insufficient regulatory control create favourable conditions for potential abuse in the distribution and use of official housing.

The current situation not only complicates the objective analysis of the state of use of the state housing fund, but also indicates possible systemic violations in the disposal of state property, which requires further detailed investigation and appropriate response from the competent authorities.

VII. REFORMING THE SERVICE HOUSING MECHANISM IN THE CONTEXT OF UKRAINE'S CURRENT HOUSING REFORM

Reform 7, "Ensuring access to housing for those in need," of Section 7, "Human Capital," [of the Plan for Ukraine Facility](#) provides for the creation of a comprehensive political and regulatory framework in the field of housing provision. The key elements of this reform are:

- adoption [of the Law of Ukraine "On the Basic Principles of Housing Policy"](#);
- the development of a State Housing Strategy;
- implementation of systemic reforms to build effective mechanisms for social and affordable housing.

These reforms are aimed at restoring the housing sector and creating an effective system of social and affordable housing that can adequately respond to the accumulated housing needs of the population, including those arising from the internal and external displacement of citizens due to the war in Ukraine.

An important component of the reform is the creation of a unified electronic system in which citizens can provide information about themselves (income, status, benefits, etc.) and receive proposals for affordable options for solving their housing issues.

To implement these tasks, the Government of Ukraine has developed a draft Law of Ukraine "On the Basic Principles of Housing Policy", which was considered by the Verkhovna Rada of Ukraine on 16 July 2025 and adopted as a basis. The draft law provides for the repeal of the current Housing Code of Ukraine as of 31 December 2025.

One of the key instruments provided for in the draft law is an updated concept of service housing, which combines the traditional approach with modern digital solutions and best practices from European countries.

According to the draft law, service housing is defined as housing that is rented to persons who, due to the nature of their employment or service, must live at or near their place of work.

The draft law establishes a differentiated approach to determining the categories of citizens who are eligible for service housing:

- for the state housing fund, the list of categories is determined centrally by the Cabinet of Ministers of Ukraine;
- for the housing fund of territorial communities, local self-government bodies are given the right to independently determine the categories of citizens who may be provided with service housing.

This provision is an important element of decentralisation and provides communities with a tool for developing their own professional and human resources potential.

For the private housing fund, the owner or tenant of the housing independently determines the categories of employees who may be provided with service housing and the conditions for such provision.

The draft law provides for a clear procedure for the provision and use of service housing from the state housing stock and the housing stock of territorial communities, which includes:

- service housing is provided for use under a lease agreement by decision of the relevant state authority, other entity managing state property as defined by law, local government body, state-owned enterprise, institution or organisation in whose economic management or operational control the relevant housing is located;
- persons conclude a lease agreement and independently pay rent and utilities;
- the use of service housing must be paid for. Tenants pay rent, the procedure for determining the amount of which is approved by the Cabinet of Ministers of Ukraine;
- in the event of termination of employment, the lease of official housing shall be terminated. For certain categories, eviction from official housing is possible only if other housing is provided, namely: persons with disabilities who have suffered damage to their health related to the performance of their job duties during the course of their employment or service with the entity providing official housing;
- information about service accommodation is entered into the Unified Information and Analytical Housing System. It should be noted here that this system, the creation of which is provided for by the draft law, should not only ensure the collection of information about housing, its owners and users, but also digitise the entire process of providing and using housing.

The draft law provides for a clear differentiation of powers between local self-government bodies and the executive branch.

- The Cabinet of Ministers of Ukraine:
 - determines the categories of persons who are eligible for official housing from the state housing fund;
 - approves the procedure for providing official housing; the model form of the lease agreement, the procedure for determining the amount of rent under the agreements and the amount of rent.
- the central executive authority that implements state housing policy (currently the Ministry of Community and Territorial Development of Ukraine):
 - provides organisational support for the provision of official housing.
- Local state administrations:
 - make decisions on the provision of official housing from the state housing fund;
 - disposing of and managing state housing fund housing under their control, including that used as official housing.
- Local self-government bodies:
 - ensure the formation and replenishment of the housing fund of territorial communities, the disposal and management of such housing fund, including that used as official housing;

- make decisions on the provision of official housing from the funds of territorial communities;
- determine the categories of persons who are eligible for official housing from local funds.

An important conceptual feature of the draft law is its clear emphasis on the temporary nature of residence in service housing. Service housing is provided exclusively for the period during which a person performs their official duties or work functions. Termination of employment or completion of service automatically results in the loss of the right to use such housing.

This approach to official housing as a "transitional" housing resource is a strategically important element in the formation of stable municipal and state-owned housing funds, preventing their gradual reduction through privatisation.

The service housing mechanism laid down in the draft law has a number of significant advantages:

- Preservation of citizens' rights to participate in other housing programmes

Living in service housing does not limit citizens' ability to simultaneously participate in state support programmes that provide for the acquisition of housing ownership. This allows persons using service housing to simultaneously resolve issues of permanent housing provision.

- Stimulation of economic activity

The bill logically assumes that a person who works and has a stable income can gradually accumulate resources to independently realise their right to permanent housing. In this context, service housing acts as a support mechanism that allows people to focus on professional development and financial planning.

- Promoting long-term planning

By using company housing, a person has the opportunity to gradually prepare for the purchase of their own home, which reduces social tension and allows for a more rational allocation of resources. This is especially important for young professionals and employees who are moving to a new place of work.

- Strategic importance of the concept of company housing

Under the new legislation, service housing is seen not as the ultimate goal of housing policy, but as a foundation for the transition to stable housing provision, including through participation in state support programmes. This approach represents a modern, responsible model that responds to both the challenges of wartime and the long-term strategy for the country's recovery.

A key advantage of the proposed model is that it prevents the reduction of state and municipal housing funds, which are an important resource for the implementation of social policy by the state and local self-government. Preserving these funds will make it possible to respond more effectively to the housing needs of different categories of the population in the future, especially in the context of post-war recovery.

Thus, the concept of service housing, enshrined in the draft Law of Ukraine "On the Basic Principles of Housing Policy", is a balanced tool that combines social support with economic expediency and a strategic vision for the development of the housing sector in Ukraine.

VIII. CONCLUSIONS AND RECOMMENDATIONS

Service housing in Ukraine is an important but vulnerable instrument of social support that has lost its effectiveness due to legal archaism. The legislative framework that took shape in the 1980s no longer corresponds to the current realities of the country's socio-economic development. The key problems of the existing system are

- the lack of a clear and transparent mechanism for accounting for service housing;
- the lack of transparency in the procedures for granting official housing for use;
- the widespread practice of removing housing from the service housing stock for the purpose of its further privatisation and large-scale abuses leading to the actual loss of the housing stock;
- social injustice in the distribution and use of official housing.

An analysis of information requested by the Housing Institute on service housing that was or is in use by employees of the judicial system revealed fragmentary data and systematic evasion of public reporting, even in response to official requests, confirming the lack of transparency of the existing system.

International practice demonstrates a consistent approach to official housing as a temporary resource rather than a potential object of ownership. In many countries (e.g., Germany, the United States, Poland, the United Kingdom), models are in place that are characterised by the following key features:

- the inability to privatise official housing;
- an orderly system of housing stock accounting;
- access to housing is linked to mobility and employment status, rather than position;
- operation on the basis of preferential or subsidised rent.

The draft of the new Law of Ukraine "On the Basic Principles of Housing Policy" is a progressive piece of legislation that is in line with European trends in housing policy. It establishes modern rules for renting service housing, provides for the creation of a digital accounting system, a clear division of powers between different levels of government, and a transparent system for providing service housing for use.

The recommendations and necessary steps for implementing an effective service housing system are as follows:

- Legislative measures (for Ukrainian state authorities):
 - repeal of the archaic Housing Code of 1983;
 - introduction of a new housing policy framework through the adoption of the Law of Ukraine "On the Basic Principles of Housing Policy" from 01.01.2026;
 - legislative prohibition of the privatisation of the newly created housing stock of territorial communities and the state housing stock;
 - unification of the rules for providing official housing at all levels through the introduction of accessible digital mechanisms.

- Organisational and technical measures (for Ukrainian state authorities):
 - creation of a Housing Register within the Unified Information and Analytical Housing System, which will contain complete information on the use of housing from state and municipal funds as service housing;
 - ensuring the transparency of the Housing Register as a platform for public viewing of the status, addresses, terms of use and grounds for providing official housing;
 - ensuring effective public control at all levels of implementation of the official housing mechanism.
- Institutional and financial measures (for Ukrainian state authorities, local self-governments with the support of international partners):
 - ensuring stable funding for the creation of a state housing fund and housing funds of territorial communities for use as service housing;
 - implementing a targeted rent mechanism (revolving fund) whereby funds received from housing rentals are used to create a new housing fund or to properly maintain the existing one;
- Monitoring, control and accountability (for Ukrainian state authorities, local self-governments with the support of international partners):
 - conducting a comprehensive study of the existing housing stock used for official purposes;
 - introduction of mandatory reporting by all housing fund administrators on the status of housing use as official housing;
 - establishing clear administrative and criminal liability for violations of the rules and regulations for the provision of official housing for use.

Official housing should not be an exception or a privilege for the "chosen ones", but a standard element of state support, especially for regions with a critical shortage of personnel. The unified information and analytical housing system, the creation of which is provided for in the draft law, is a key instrument of the digital transformation of housing policy, which will contribute to its transparency and effectiveness.

The potential risks are as follows:

- insufficient investment and own resources to create a state and municipal housing fund;
- resistance to limiting the possibility of removing housing from the list of service housing and subsequent privatisation;
- resistance from individuals who are expecting the privatisation of service housing.

Ways to minimise risks:

- conducting a broad information campaign on the advantages of the new approach to service housing;

- explaining the situation to potential recipients of service housing to reduce resistance to change;
- studying and adapting international experience;
- developing public-private partnerships to attract additional investment in the creation of a housing stock.

Reforming the service housing system is an important part of the overall transformation of Ukraine's housing policy, which will ensure a more equitable, transparent and efficient distribution of state and local community housing resources, especially in the context of the country's post-war recovery.

APPENDIX. Results of processing responses received from judicial authorities regarding service housing

No	Name of judicial authority	Response to the request regarding official housing
Vinnytsia region		
1.	Vinnytsia Court of Appeal	The Vinnytsia Court of Appeal does not have any records or documentation of the requested information
2.	Vinnytsia District Administrative Court	2 residential properties, in use since 2019 and 2020. The accommodation is used by judges
3.	Commercial Court of Vinnytsia Region	No information
4.	Seventh Administrative Court of Appeal	The requested information does not exist and is not public information within the meaning of the Law, as it requires additional analysis not provided for by the Law, and therefore cannot be provided in this form.
Volyn Region		
5.	Volyn District Administrative Court	No information
6.	Volyn Court of Appeal	One service apartment on the balance sheet, in use by a judge since 2019
7.	Volodymyr-Volynskyi City Court	No information
8.	Gorokhiv District Court	
9.	Commercial Court of Volyn Region	
10.	Ivanychi District Court	

11.	Kamin-Kashirsky District Court	
12.	Kivertsi District Court	
13.	Kovel City and District Court	<p>Currently unavailable.</p> <p>In 2018, in accordance with the decision of the Kovel City Council, the Chairman of the Kovel City District Court received an official apartment at the expense of the local budget. In 2020, it was excluded from the list of official apartments.</p>
14.	Lokachi District Court	No information
15.	Lutsk City District Court	
16.	Lyubeshiv District Court	
17.	Lyuboml District Court	
18.	Manevychi District Court	<p>During the specified period, the judge received official housing.</p> <p>In accordance with the order of the Manevychi District State Administration, it was excluded from the list of official residences.</p>
19.	Novovolynsk City Court	No information
20.	Ratne District Court	
21.	Rozyishche District Court	
22.	Starovyzhivsky District Court	
23.	Turiysk District Court	

24.	Shatsk District Court	
Dnipropetrovsk Region		
25.	Commercial Court of Dnipropetrovsk Region	
26.	Dnipro Court of Appeal	
27.	Dnipropetrovsk District Administrative Court	No information
28.	Third Administrative Court of Appeal	
Donetsk Region		
29.	Artemivsk City District Court	In 2021, an official apartment was provided to a judge in Bakhmut
30.	Donetsk District Administrative Court	<p>The total number of official residential apartments is 88, of which 86 are located in the city of Sloviansk, Donetsk Region, and 2 are located in the city of Kramatorsk, Donetsk Region.</p> <p>The following employees use official housing:</p> <ul style="list-style-type: none"> 1) judges – 34, 2) court staff: <ul style="list-style-type: none"> - judges' assistants – 19; - chief of staff – 1; - deputy head of staff – 1; - department heads – 5; - deputy heads of departments – 3;

		<ul style="list-style-type: none"> - chief specialists – 2; - Leading specialists – 3; - Court clerks – 4; - senior consultants – 3; - Head of Archives – 1; - court secretary – 1, <p>The above-mentioned persons have been using official accommodation since 2017, 2018, 2019, 2024 and to date.</p> <p>In addition, persons who have terminated their employment with the court and continue to use official housing pursuant to Article 125 of the Housing Code of Ukraine also use official housing:</p> <ol style="list-style-type: none"> 1) 1 judge, year of termination of employment – 2022, has been using the accommodation since 2017; 2) 1 judge, year of termination of employment – 2024, has been using the accommodation since 2024; 3) 1 judge, year of termination of employment – 2024, has been using the accommodation since 2018; 4) 2 judges, year of termination of employment – 2024, have been using the accommodation since 2019; 5) 1 judge, year of termination of employment – 2018, has been using the accommodation since 2017; 6) 1 judge, year of termination of employment – 2024, has been using the accommodation since 2020.
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		<p>7) 1 department head, year of termination of employment – 2024, has been using the accommodation since 2019;</p> <p>8) 1 deputy head of department, year of termination of employment – 2022, has been using the accommodation since 2019;</p> <p>9) 1 deputy head of department, year of termination of employment – 2021, has been using the accommodation since 2017;</p> <p>10) 1 assistant judge, year of termination of employment – 2023, has been using the accommodation since 2017.</p> <p>There is no housing that has been removed from the list of official housing in the court.</p>
31.	Kostiantynivka City Court	Since 2019, in the city of Kostiantynivka, 2 flats have been used by judges
32.	Krasnoarmiysk City Court	1 official residence used by a judge, destroyed
33.	Commercial Court of Donetsk Region	<p>The Commercial Court of Donetsk Region has 46 official apartments transferred for use.</p> <p>Of these, 20 are for judges and 26 are for court staff, including: the head of the court, judges' assistants, the deputy head of the court, the court clerk, department heads, sector managers, chief specialists and other court staff, including inspectors.</p> <p>These service apartments were transferred for use in 2018–2019 to court employees, 44 of whom continue to be employed by the Commercial Court of Donetsk Region.</p> <p>At the same time, in accordance with current legislation, the right to use official housing is retained by the judge for the duration of his or her term of office, as</p>

		<p>well as by the family members of a deceased judge who was provided with official housing during his or her lifetime.</p> <p>In addition, over the past 10 years, the Commercial Court of Donetsk Region has not made a single decision to evict family members of judges or court employees from their housing after their dismissal or death.</p>
34.	The Mariinsky District Court	<p>13 flats have been provided to court employees, 5 judges, 2 to the head of the apparatus, 1 to the deputy head of the apparatus, 1 to the chief specialist, 1 to the secretary, 2 to the court clerk, and 2 to the judge's assistants. The city of Kurakhove is under occupation, and the housing is not being used.</p>
35.	Oleksandrivka District Court	<p>Since 2019, the judge has been using accommodation in the village of Oleksandrivka</p>
36.	First Administrative Court of Appeal	<p>The First Administrative Court of Appeal has 58 service apartments on its balance sheet, which were purchased by the court in 2017-2018 for internally displaced persons (employees who moved from Donetsk to Kramatorsk). All apartments are located in Kramatorsk, Donetsk region. Over the past 10 years, there have been no exceptions to the exclusion of official residential premises (apartments) from the list of official premises.</p> <p>Fifty-three official residential premises are used by judges and court staff. Five official residential premises are not in use.</p> <p>All judges and court staff who have worked in the court for more than ten years have retained the use of their official residential premises (apartments) on the basis of Article 125 of the Housing Code of Ukraine.</p> <p>We would also like to inform you that all dismissed court staff with less than 10 years of service at the court who have submitted a corresponding application</p>

		have been granted the right to use their official residential premises by a protocol decision of the housing commission, temporarily, but for no more than six months after the end of martial law, due to the fact that the apartments are located in Kramatorsk, in the combat zone, and the dismissed employees have personal belongings in the service apartments and continue to pay for utilities.
37.	Selidovo City District Court	The judge was provided with official accommodation in the city of Selidovo. It is currently under occupation.
38.	Sloviansk City District Court	In the city of Sloviansk, Donetsk region, employees of the Sloviansk City District Court of Donetsk region have official housing (2 apartments) at their disposal. One apartment has been used by a judge of the Sloviansk City District Court of Donetsk Oblast since 2018, and the second apartment has been used by a judge's assistant since 2019. Currently, the judge and court employee who use the official housing work at the Sloviansk City District Court of Donetsk Oblast.

Zhytomyr Region

39.	Commercial Court of Zhytomyr Region	No information
40.	Zhytomyr Court of Appeal	
41.	Zhytomyr District Administrative Court	

Zakarpattia Region

42.	Transcarpathian Court of Appeal	No information
43.	Transcarpathian District Administrative Court	

44.	Commercial Court of Zakarpattia Region	
Zaporizhzhia Region		
45.	Commercial Court of Zaporizhzhia Region	
46.	Zaporizhzhia District Administrative Court	No information
47.	Zaporizhzhia Court of Appeal	1 flat used by a judge in Zaporizhzhia
Ivano-Frankivsk Region		
48.	Commercial Court of Ivano-Frankivsk Region	No information
49.	Ivano-Frankivsk District Administrative Court	No information
50.	Ivano-Frankivsk Court of Appeal	
Kyiv		
51.	Kyiv Commercial Court	
52.	Kyiv Court of Appeal	No information
53.	Kyiv District Administrative Court	
54.	Northern Commercial Court of Appeal	Judges of the Northern Commercial Court of Appeal were provided with two apartments in 2022 and 2024, respectively, located in Kyiv.
55.	Sixth Administrative Court of Appeal	15 service apartments in Kyiv. Provided to 11 judges and 4 staff members.

		Requests were sent to the executive body of local self-government to exclude them from official use.
Kyiv Region		
56.	Commercial Court of Kyiv Region	Since 26 February 2019, one judge at the Commercial Court of Kyiv Region has been using official accommodation located in Kyiv.
Kirovohrad Region		
57.	Commercial Court of Kirovohrad Region	No information
58.	Kirovohrad District Administrative Court	
59.	Kropyvnytskyi Court of Appeal	
Luhansk Region		
60.	Luhansk Court of Appeal	All official housing provided to judges and employees of the Luhansk Court of Appeal is located in the occupied territory, access to the housing is unavailable, which makes it impossible to use the specified housing.
61.	Luhansk District Administrative Court	As of today, the Luhansk District Administrative Court has 36 service apartments in Severodonetsk (Siverskodonetsk) on its off-balance sheet, which are state-owned properties under the management of the State Judicial Administration of Ukraine. In accordance with current legislation, judges and court staff exercised their right and received official housing.

		<p>On 25 June 2022, according to official reports from the head of the military-civilian administration of Severodonetsk, the city was temporarily seized, including the administrative building of the Luhansk District Administrative Court.</p> <p>The property belonging to the Luhansk District Administrative Court, in particular the official apartments provided for use by court employees, is not under the control of the responsible employees and is not in use, as most of the city's population, including judges and court employees, has been evacuated due to the active phase of hostilities in Severodonetsk.</p>
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Lviv region

62.	Eighth Administrative Court of Appeal	At the Lviv Administrative Court of Appeal, whose document flow and archives have been transferred to the Eighth Administrative Court of Appeal, official housing located in the city of Lviv has been removed from the list of official housing in accordance with the decision of the housing commission of the Lviv Administrative Court of Appeal dated 21 December 2017.
63.	Commercial Court of Lviv Region	
64.	Dubno City District Court	
65.	Western Commercial Court of Appeal	No information
66.	Lviv Court of Appeal	
67.	Lviv District Administrative Court	

Mykolaiv Region

68.	Commercial Court of Mykolaiv Region	No information
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69.	Mykolaiv Court of Appeal	
Odesa Region		
70.	Odesa District Administrative Court	No information
71.	Ananyiv District Court	
72.	Artsyz District Court	
73.	Balt District Court	
74.	Berezivka District Court	
75.	Bilhorod-Dnistrovskyi City and District Court	We do not have the information requested in the inquiry, and therefore cannot provide it.
76.	Bolgrad District Court	One judge uses housing provided in 2019
77.	Velyka Mykhailivka District Court	No information
78.	Commercial Court of Odesa Region	
79.	Ivanivka District Court	
80.	Illichivsk City Court	
81.	Kyiv District Court of Odessa	
82.	Kiliya District Court	In 2010, one judge received official housing

83.	Kodyma District Court	
84.	Kotovsk City District Court	
85.	Krasnoknyansky District Court	
86.	Lyubashivsky District Court	
87.	Malynovsky District Court of Odessa	
88.	Mykolaiv District Court	
89.	Ovidiopol District Court	
90.	Odesa Court of Appeal	No information
91.	South-Western Commercial Court of Appeal	
92.	Primorsky District Court of Odessa	
93.	Fifth Administrative Court of Appeal	
94.	Reni District Court	
95.	Rozdilnyansky District Court	
96.	Savran District Court	
97.	Sarata District Court	
98.	Tarutyne District Court	

99.	Tatarbunar District Court	
100.	Teplodar City Court	
101.	Shyryaivsky District Court	
102.	Yuzhny City Court	Three judges use living space in a dormitory
Poltava Region		
103.	Poltava Court of Appeal	No information
104.	Commercial Court of Poltava Region	
105.	Poltava District Administrative Court	Official housing that has been removed from the list of official housing over the last 10 years (2014-2024) - 1; location - Poltava; reason for removal - decision of the Executive Committee of the Poltava City Council dated 07.07.2022 No. 268.
Rivne Region		
106.	Commercial Court of Rivne Region	No information
107.	Berezne District Court	
108.	Mlyniv District Court	
109.	Ostrog District Court	
110.	North-Western Commercial Court of Appeal	
111.	Rivne Court of Appeal	

112.	Rivne City Court	
113.	Rivne District Administrative Court	
114.	Rivne District Court	
115.	Rokytne District Court	
116.	Sarny District Court	
117.	Kuznetsov City Court	<p>In 2015, the judge was provided with a service apartment, which was removed from the list of service apartments.</p> <p>In 2020, the judge was provided with an apartment.</p>
118.	Hoshcha District Court	No information
119.	Demydivsky District Court	
120.	Dubrovitskyi District Court	
121.	Kostopil District Court	
Sumy Region		
122.	Commercial Court of Sumy Region	No information
123.	Sumy Court of Appeal	Two apartments were removed from the list of official residences.
124.	Sumy District Administrative Court	No information
Ternopil Region		

125.	Berezhany District Court	
126.	Borshchiv District Court of Ternopil Region	
127.	Buchach District Court of Ternopil Region	
128.	Commercial Court of Ternopil Region	
129.	Husiatyn District Court of Ternopil Region	
130.	Zalishchyky District Court of Ternopil Region	
131.	Zbarazh District Court	
132.	Zboriv District Court of Ternopil Region	No information
133.	Koziv District Court of Ternopil Region	
134.	Kremenets District Court of Ternopil Region	
135.	Lanivtsi District Court of Ternopil Region	
136.	Monastyryska District Court	
137.	Pidvolochysk District Court	
138.	Pidhaetsky District Court	
139.	Terebovlia District Court of Ternopil Region	
140.	Ternopil Court of Appeal	

141.	Ternopil City District Court	
142.	Chortkiv District Court	
143.	Ternopil District Administrative Court	
144.	Shumsk District Court	
Kharkiv Region		
145.	Commercial Court of Kharkiv Region	No information
146.	Second Administrative Court of Appeal	<p>Two apartments, one transferred for use in 2024, the other transferred for use in 2020, in 2020 the judge resigned.</p> <p>The flat was removed from the list of official property and remains on the court's balance sheet.</p>
147.	Eastern Commercial Court of Appeal	<p>There are 21 service apartments in use, including 10 apartments purchased for judges who were transferred from the Donetsk Court of Appeal. Four judges have retired, but the apartments remain in use.</p> <p>One flat is used by a court employee.</p>
148.	Kharkiv District Administrative Court	<p>One official residence was provided to a judge.</p> <p>The apartment was removed from the list of official residences, but a decision has been made to revoke this decision. The case is being considered by the Supreme Court.</p>
149.	Kharkiv Court of Appeal	No information

Kherson Region		
150.	Commercial Court of Kherson Region	No information
151.	Kherson Interdistrict Court	
152.	Kherson District Administrative Court	
Khmelnytskyi Region		
153.	Commercial Court of Khmelnytskyi Region	No information
154.	Khmelnytskyi Court of Appeal	The Khmelnytskyi Regional Court of Appeal was liquidated (13 February 2020). According to archival materials, in 2016, seven apartments were excluded from the list of official residences, and in 2018, two apartments were excluded. In 2020, four apartments were provided to judges of the Khmelnytskyi Court of Appeal.
155.	Khmelnytskyi District Administrative Court	No information
Cherkasy region		
156.	Cherkasy Court of Appeal	No information
157.	Commercial Court of Cherkasy Region	
158.	Cherkasy Regional Administrative Court	
Chernivtsi Region		
159.	Commercial Court of Chernivtsi Region	No information

160.	Chernivtsi District Administrative Court	
161.	Chernivtsi Court of Appeal	7 apartments used by judges
Chernihiv Region		
162.	Chernihiv Court of Appeal	No information
163.	Commercial Court of Chernihiv Region	No information
164.	Chernihiv District Administrative Court	
165.	High Anti-Corruption Court	The High Anti-Corruption Court purchased 34 apartments in Kyiv as official housing, of which 23 apartments were transferred for use by judges of the High Anti-Corruption Court as a court of first instance, and 11 to judges of the Appeals Chamber of the High Anti-Corruption Court. All apartments have the status of official housing and are currently in use by judges: 3 since 2019 and 31 since 2020.
166.	High Qualification Commission of Judges	No information
167.	National School of Judges	
Judicial Administration and Territorial Offices		
168.	State Judicial Administration of Ukraine	As of 01.01.2025, the Unified Register of State Property, administered by the State Property Fund of Ukraine, contains 464 state-owned service apartments, which are recorded on the balance sheet of the courts and territorial administrations of the State Judicial Administration of Ukraine and belong to the sphere of management of the State Judicial Administration of Ukraine.

		<p>244 service apartments are located in the Donetsk region: in the cities of Donetsk, Makiivka, Mariupol, Bakhmut, Sloviansk, Pokrovsk, Kramatorsk, Kurakhove, Kostyantynivka, Lyman, Selidovo, and the village of Oleksandrivka, which are currently occupied by the Russian Federation or where active hostilities are taking place.</p> <p>111 service apartments are located in Kharkiv.</p> <p>77 service apartments are located in the Luhansk region: in Severodonetsk, Rubizhne, and Svatove, which are currently occupied by the Russian Federation.</p> <p>32 service apartments are located in other regions: in Kyiv, Dnipro, Odesa, Vinnytsia, Lutsk, Chernivtsi, Pavlohrad in the Dnipropetrovsk region, Vyshhorod, Irpin, Bila Tserkva in the Kyiv region, and Trostyanets in the Sumy region.</p>
169.	Territorial administration in Vinnytsia region	No information
170.	Territorial administration in Donetsk region	<p>46 flats, of which 3 are located in Makiivka – 2, Volnovakha, 10 – in Sloviansk, 1 in Donetsk, 13 in Kurakhove, 8 in Kramatorsk, 4 in Pokrovsk, 1 in Oleksandrivka, and 1 each in Oleksandrivka, Bakhmut, Selidove, Lyman, and Kostyantynivka</p> <p>In 2021, 1 apartment was removed in Sloviansk</p>
171.	Territorial administration in Zakarpattia Oblast	No information
172.	Territorial Administration in Mykolaiv Region	<p>7 flats for use by judges and administrative staff</p> <p>1 apartment removed from the list of official housing</p>
173.	Territorial administration in Kirovohrad region	
174.	Territorial administration in Lviv region	No information

175.	Territorial administration in the Kherson region	
176.	Territorial administration in Volyn region	It is noted that judges received housing at the expense of the local budget, without specific data
177.	Territorial administration in Zhytomyr region	No information
178.	Territorial administration in Ivano-Frankivsk region	
179.	Territorial administration in Kyiv	5 service flats 1 flat removed from the list of service flats
180.	Territorial administration in Luhansk region	
181.	Territorial administration in Odesa region	No information
182.	Territorial administration in Zaporizhzhia region	
183.	Territorial administration in Sumy region	1 apartment in Trostyanets, damaged
184.	Territorial administration in Kyiv region	3 apartments used by judges of local general courts
185.	Territorial administration in Chernihiv region	No information
186.	Territorial Administration in Ternopil Region	
187.	Territorial administration in the Kharkiv region	3 service apartments, occupied by judges
188.	Territorial administration in Dnipropetrovsk region	6 flats used by judges and 2 assistant judges
189.	Territorial administration in Cherkasy region	No information

190.	Territorial administration in Poltava region	
191.	Territorial Administration in Chernivtsi Region	The territorial administration of the State Judicial Administration of Ukraine in Chernivtsi region has two service apartments located in the city of Chernivtsi. They are used by judges. The territorial administration did not carry out the procedure for removing the apartments from the list of service apartments.
192.	Territorial Administration in Khmelnytskyi Region	No information