



Occupation, Collaboration and Resistance in Ukraine

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Executive Summary

As Russia's war in Ukraine enters the fifth year since the full-scale invasion, Kremlin doctrine and practice have coalesced into treating the occupied territories as permanent Russian regions to be Russified and militarized as such. This marks a move away from the previous patchwork of occupation methods towards something more coherent with fewer local variations and less room for informal compromise. At the same time, methods are being tailored to expand the occupation of Ukraine into new areas.

This has been carried out through a combination of harsh measures:

- Pressure on Ukrainians in occupied territories to adopt Russian passports and accept Russian legal status.
- Deportations and forcible transfers of Ukrainians (including children) into Russia, along with “re-education” and forced integration policies.
- Nationalisation of “abandoned” property in occupied regions, creating a legal basis to redistribute land and housing to incoming settlers.

Taken together, these measures have resulted in a systematic population exchange, the purpose of which is, first, to make it impossible – and also less desirable – to return the areas to Ukraine; and, second, to facilitate the forced and large-scale recruitment of the local population into Russia's war.

The international community has a responsibility to ensure that Russia's war crimes and crimes against humanity in the occupied territories do not go unpunished.

Introduction

Russia has been consistent in its war with Ukraine in that its overall goal is to destroy Ukraine as a nation and a state. Territory occupied by Russia has been illegally annexed and incorporated as federal subjects of the Russian Federation. This has been confirmed in an amendment to the Russian Constitution. If instead Russia had preferred the occupied territories to retain some form of autonomy, and the Kremlin's intentions were only to control them politically, it would have been more appropriate to establish a “Ukrainian People's Republic” on the occupied territories, rather than to annex them.

In line with Vladimir Putin's 2021 [essay](#), “On the Historical Unity of Russians and Ukrainians”, this “unification” is a historic mission for Russia that will be executed sooner or later. It does not matter that Ukrainian resilience has been successful and that Russia does not yet have the resources to achieve its aims.

This report offers an update on developments in the Russia-occupied territories of Ukraine. It complements and updates [previous reports](#) by SCEEUS on the subject and broadens the picture by focusing on the characteristics of collaboration and resistance in the occupied territories. It also highlights nuances within Ukrainian society on how to view certain aspects of life under occupation in Ukraine.

The current state of the occupation

In 2025, Russia's policy on the occupied territories of Ukraine became more centralised, harsher and better coordinated compared to earlier phases of the occupation. Under the supervision of Sergei Kiriienko, first deputy chief of staff of the Russian Presidential Administration and principal overseer of the policy on the occupied territories, the overall trajectory has gone from partial, uneven Russification to an almost total erasure of Ukrainian culture and language in public life.

Among the most important decisions were a cluster of Kremlin decrees and policies that attempt to lock-in longterm control over identity, population and the law in these regions, including through the militarisation of the local population:

- On 10 September 2025, the Kremlin formally concluded its [campaign](#) to force Ukrainians in the occupied territories to take Russian passports, in line with a 20 March 2025 presidential decree. According to this [decree](#), all residents of the occupied regions are required to become passport-holding citizens of Russia to “settle their legal status”. Ukrainians without a Russian passport face deportation and loss of access to essentials such as healthcare, property and even employment.
- Also from September, Ukrainian-language schooling was [banned](#) and families that kept children in online Ukrainian classes faced punitive measures. By late 2025, the occupation authorities were claiming a full [transition by schools](#) to Russian education standards, intensifying the use of new Russian textbooks with mandatory “patriotic” content.
- In October 2025, Putin approved a [State Migration Policy Concept](#) for 2026–2030 that explicitly targets populations in the occupied Donetsk, Luhansk, Kherson and Zaporizhzhia oblasts. It combines incentives for Ukrainians to return with efforts to move in Russian citizens. This document treats residents of the so-called new regions as Russian residents who left “during the special military operation”. The Kremlin has declared its intention to “create conditions for their return from abroad”.
- Furthermore, Russia has [expanded](#) so-called military-patriotic youth structures in the occupied territories, such as large training centres, where active-duty soldiers run tactical training for teenagers. Whereas the earlier phases of occupation relied more on sporadic or hidden recruitment, the post-2025 framework normalises and scales-up the use of occupied populations in Russia's armed forces.

These illegal mobilisation efforts serve a [dual purpose](#). First, they allow Russia to address its manpower shortages without disturbing the domestic population. Second, Russia is instrumentalising mobilisation to suppress anti-occupation sentiment and resistance by incentivising compliance. Under international humanitarian law, specifically [the Fourth Geneva Convention](#) (1949), an occupying power is strictly prohibited from mobilising, conscripting or forcing residents of occupied territories to serve in its armed or auxiliary forces. Russia's aim is probably mass recruitment not just for this war, but for the next – with Europe.

Human rights reporting on the occupied territories has noted a significant tightening of repression, including broader use of the labels “extremism” and “terrorism”, crackdowns on ethnic minority groups such as Crimean Tatars, as well as activists and women, and expanded use of general laws to silence dissent.

According to the UN-mandated [Independent International Commission of Inquiry on Ukraine](#), in a report published in March 2026, the Russian authorities have committed crimes against humanity involving the deportation and forcible transfer of children from the occupied territories. Thus far, the commission has verified the deportation or transfer of over 1,200 children from five regions in Ukraine. In March 2026, the Yale School of Public Health Humanitarian Research Lab [concluded](#) that at least two Russian state-owned oil and gas companies – Gazprom and Rosneft – underwrote and facilitated the transportation and/or re-education of approximately 2,158 children from Russian-occupied Ukraine between 2022 and 2025.

According to [Bring Kids Back UA](#), an initiative launched by President Volodymyr Zelenskyi in 2023, the number of deportations and forced transfers of children at the time of writing this report is at least 20,570.

Russian surveillance in the occupied areas of Ukraine works as a tight mix of digital interception, physical monitoring and state-controlled apps that track people's communications, movements and identities. On 1 September 2025, the Kremlin introduced the [Max](#) super-app across the occupied territories, which fuses banking, messaging and public services in a single monitored ecosystem that automatically syncs with the servers of Russia's System for Operative Investigative Activities (SORM). The system is designed to control the population and root out resistance or proUkrainian activity.

Russia's occupation playbook

There is strong evidence that Russia has a 'playbook' for its occupations. This should not necessarily be thought of in a literal sense, but rather as a template that has been used in previous occupations of parts of Georgia, Crimea and Donbas, as well as other areas of Ukraine since 2022. It has not been applied mechanically but adapted to local conditions. Common elements of this playbook, which has been refined over time, are military intervention, passportization, the creation of a 'legal theatre' through sham referendums or pseudo-legal claims, the installation of proxy administrations, forceful russification and militarisation, and pressure to absorb occupied areas into Russian political and economic systems.

Russia's long-term goals and strategy intend that the type of occupation being carried out today should be extended to other parts of Ukraine if Russia expands its occupation or parts of Ukraine currently controlled by Kyiv are transferred to Russia under a capitulation "peace agreement", such as has been imposed by the Trump administration.

International and national attention on the occupied territories

Despite the severity of the crimes committed by Russia, international attention on what is happening in the occupied territories is quite low. The occupied territories have not featured much in the US-led "peace talks" over the past year. President Trump's envoys, Steven Witkoff and Jared Kushner, have given their [assent to Russian talking points](#), notably that most Russian-speaking residents in the four occupied oblasts have confirmed their desire to join Russia in referendums.

Interest within Ukraine is principally maintained by civil society, since many of its activists are from these regions. In other sectors of society in unoccupied Ukraine, there are few representatives from the occupied territories or from among internally displaced persons (IDPs) generally. Since elections have not been held in parts of Donetsk and Luhansk or in Crimea since before 2014, these regions have few representatives in parliament. However, even if the topic of the occupied territories has fallen off the immediate agenda inside Ukraine, any decision to abandon the territories would be likely to cause widespread dissatisfaction and protest.¹

Collaboration in the occupied territories

Since the earliest days of Russia's war in Ukraine in 2014, following the annexation of Crimea, collaboration with the occupying authorities has been a widespread and underreported problem. Common examples of collaboration range from public approval of Russian aggression and calls to support the occupying forces, to active collaboration with the occupation administrations. Military collaboration with the occupying forces includes sharing Ukrainian military positions and voluntary recruitment into the occupying armed forces.

In the first days of the full-scale invasion, the Ukrainian Parliament cracked down on collaborators. In March 2022, parliamentarians added [Article 111-1](#) to the Criminal Code of Ukraine, which prohibits Ukrainians in the occupied territories from cooperating with the Russian occupation authorities, holding any position in illegal administrations, running schools or running joint businesses, among other things. The [article](#) also covers denial of aggression, supporting propaganda and doing business with the aggressor state. Punishments under Article 111-1 vary depending on the type and severity of the offence. They range from long-term bans on holding certain positions or engaging in certain activities for up to 15 years, to life imprisonment with possible confiscation of property where the collaboration has caused deaths or had other serious consequences.

Human rights activists and representatives of civil society in Ukraine have widely criticized Article 111-1. Their main argument is that the law is too broad and too vague, which can make it hard to distinguish malign collaboration from ordinary conduct under occupation. Critics also argue that some parts of the statute conflict with international humanitarian law and human rights standards, especially when people are punished for actions that they may have been compelled to take. One example is that firefighters and other rescue workers who continue to work under Russian occupation are considered collaborators according to the legislation, even though their work could be seen as essential for the security of Ukrainian citizens living in the occupied territories. Critics argue that exceptions should be made for those working in emergency services and humanitarian aid.² Ukrainian officials and lawmakers have resisted demands to soften the article, however, citing national security.³

Resistance in the occupied territories

From the perspective of international law, the additional protocol to the [Geneva conventions](#) (1977) extends the law on international armed conflict. It states that: "armed conflicts in which peoples are fighting against colonial domination and alien occupation and against racist regimes are to be considered international conflicts". This means that organised resistance to an occupying power in such situations can be treated as a party to the international armed conflict, bringing into play the full body of international humanitarian law governing the conduct of hostilities and the protection of civilians.

Resistance to Russia's occupation of Ukraine was described in March 2026 by the Estonian [International Centre for Defence and Security](#) as a sophisticated and well-organised movement that has evolved from spontaneous actions into a system of decentralised, trust-based networks. Despite brutal Russian countermeasures and massive surveillance, resistance has not just survived, but increased its reach and technical prowess.

² Author's interview with civil society representatives, Kyiv, January 2026.

³ Author's interviews with Ukrainian officials, Kyiv, January 2026.

The various types of resistance in the occupied territories include sabotage of infrastructure, such as railway lines, and attacks on the Russian military and civilian occupation administration by partisan groups. There have also been non-violent street protests or roadblocks, and civilian coordination such as boycotts of 'referendums'.

Professor Jade McGlynn, a leading international expert on the occupied territories, [classifies](#) types of resistance there as private and non-violent, private and violent, public and nonviolent, and public and violent. These categories are not rigid, however, since individuals move between them or perform one role while enabling another. In addition, the distinction between violent and non-violent resistance has largely collapsed, according to her study, as in war "everything leads to violence one way or another".

In terms of violent resistance, there is a [clear emphasis](#) on low-signature, disruptive operations, primarily vehicle arson, sabotage of transport infrastructure and targeted strikes on logistics. The south – particularly Kherson, Zaporizhzhia and Mariupol – is the hub of sabotage, where precision attacks target Russian supply chains, such as ammunition convoys and rail-relay distribution along the Kakhovka and Tomak railway lines. The town of Melitopol in the Zaporizhzhia oblast has witnessed assassinations of collaborators.

Among the major resistance organisations are:

- [Zhovta strichka](#) (Yellow Ribbon), a non-violent Ukrainian resistance movement which formed in April 2022. It uses symbols such as yellow ribbons, posters, graffiti and flags to show that many residents in the occupied areas still identify with Ukraine and oppose the occupation.
- [Atesh](#) (which means fire in Crimean Tatar), a military partisan movement of Crimean Tatars, Ukrainians and Russians fighting against the occupation, formed in September 2022. The group spies on Russian military movements, sabotages infrastructure and gathers intelligence, mostly in Crimea but also in other occupied areas and even inside Russia itself. It often uses Telegram to report back to Ukrainian forces.
- [Zla Mavka](#) (Angry Mavka), a women's non-violent partisan resistance movement founded by three Ukrainian women in Melitopol in early 2023. Named after Mavka, a mythical Ukrainian forest spirit who lures and defeats men, Zla Mavka symbolizes female defiance and power. It uses Telegram chatbots for secure task coordination. Members operate anonymously online and on the ground, distributing anti-occupation posters, leaflets and materials in cities across Donetsk, Luhansk and Crimea, and in other areas. The movement exploits the occupier's misogyny, as it underestimates the roles of women in resistance.

Policy recommendations for the EU

In the absence of any US-brokered peace deal of the type referred to above, the main responsibility of the EU and its members states to uphold international law and Ukraine's territorial integrity, support Ukraine's liberation and reintegration, and help affected people through sanctions, humanitarian aid and longterm integration into the EU. This can be achieved by:

1. Discussing the situation in the occupied territories, including the population's resistance to Russian occupation, in all relevant international forums, calling for Russian accountability and more effectively counteracting Russian disinformation on the war and the occupation.

2. Increasing financial support to Ukrainian organisations, such as ZMINA, the Ukrainian Helsinki Group, Truth Hounds, Human Rights Watch, the Ukrainian Legal Advocacy Foundation and the Centre for Civil Liberties, that document Russian war crimes and track perpetrators.
3. Encouraging the Ukrainian authorities to initiate a proactive discussion on fully aligning its legislation on collaboration with international humanitarian law.
4. Ensuring that any future peace agreement must provide Ukraine with credible security guarantees, ensure accountability for crimes of aggression and war crimes, and force Russia to compensate Ukraine for all the damage caused, not least in the occupied territories.
5. Clearly stating that occupied Ukrainian territory will never be legally recognised by the EU and its member states as Russian territory.



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