FRA EUROPEAN UNION AGENCY FOR FUNDAMENTAL RIGHTS

FLEEING UKRAINE

IMPLEMENTING TEMPORARY PROTECTION AT LOCAL LEVELS

REPORT

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National level
Alpes-Maritimes
Île-de-France
Germany
Berlin
Stuttgart
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National level
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Kerry
Italy
Naples
Rome
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Lublin
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Foreword

Right across the EU, people have shown huge empathy for those fleeing Ukraine. European municipalities, local authorities, cities and villages warmly welcomed them. Governments responded rapidly and came up with innovative solutions. Extraordinary cooperation and coordination between civil society organisations, the private sector and governments supported people find homes, schools and start to build a new life in a new place. We know from our survey research that many people feel part of the community in their host country and feel valued. Their arrival enriches our societies in new ways.

Many administrative challenges that could have taken years to overcome were done in a matter of weeks and months. The EU's temporary protection directive – triggered for the first time – entitled people fleeing Ukraine to access certain rights. It shows that protection-related mechanisms can work, quickly and effectively.

But the practical obstacles are not always easily overcome, as this report shows. Language barriers affect access to employment and meaningful participation in education. Limited capacity in healthcare systems to address deep psychological needs arising from experiences of trauma is a real concern. Many people have serious financial worries, considering the affordability of housing in a context where the cost of living has been rising rapidly.

Now, add in the uncertainty of whether you will be allowed to stay as a 'temporary' beneficiary in the EU. Not knowing how long someone will stay in a certain town, city, or country inevitably also causes uncertainty and general confusion for local authorities trying to support these people. On top of this, many local authorities are already struggling to meet existing demands from the local population.

This has ramifications for fundamental rights. There are many obstacles to accessing housing, education, employment and healthcare. As just a snapshot, this report shows the challenges facing local authorities in their efforts to implement the temporary protection directive.

We must acknowledge that longer-term solutions are needed. Many people have built a new life in the EU and may wish to stay. And yet, there is an obvious incompatibility of temporary protection status being applied long-term. To ensure full access to rights in practice, we must reframe our thinking to take a longer-term perspective.

Local efforts to support people fleeing Ukraine made life bearable in those first few horrifying weeks and months of Russia's invasion of Ukraine. There are many examples of innovative good practices by European municipalities and regions. We can learn from this experience and improve our responses to future challenges. We can also be heartened by the tremendous show of solidarity in the face of such threats, where unprecedented action and immense cooperation made the impossible seem possible.

Michael O'Flaherty

Director

Key findings

When people fleeing the Russian war of aggression against Ukraine arrived in EU countries, local authorities had to provide temporary protection at short notice. They made and sustained remarkable efforts to adequately receive displaced people in cooperation with civil society and other local bodies.

Many local authorities were already overburdened, and resources were scarce. Planning proved to be a major challenge for local authorities in implementing temporary protection due to uncertainty over the number of displaced people and the anticipated duration of their stay. Fluctuating data, or lack thereof, as well as length of stay and type of protection status added further complexity. Additional challenges were insufficient consultation between local authorities and national governments, limited qualified staff, limited financial resources, housing infrastructure and local capacity to provide for those with special needs.

These challenges made it difficult for local authorities to implement support measures to meet demands in the four areas regulated by the Temporary Protection Directive – housing, education, employment and healthcare.

Housing

Local accommodation solutions relied on private providers and newly sourced public facilities to provide a fast response, but it was not sustainable in the long term. People had to move frequently. That increased local administrative workload and negatively affected beneficiaries, particularly children attending school.

Local authorities faced several challenges with reimbursing private accommodation providers. Reasons for discontinuing privately provided accommodation included delays, complicated administrative procedures, insufficient allowances, fraud and uncertainty about the continuation of reimbursement. Prior vetting of privately provided accommodation was a significant burden on local authorities. They did not do it systematically in advance everywhere.

Increasing public accommodation capacity was difficult because planning and funding were uncertain. As a result, conditions were poor and posed risks to children and vulnerable people. Information on housing options was sometimes confusing or not available in Ukrainian. Funding was not always correctly assigned, and efforts to acquire funding put additional strain on local authorities.

Many arrivals, such as women with small children and elderly people had special needs. Local housing solutions could not always take them into account. The temporary nature of displaced people' protection status and the uncertainty of their stay were obstacles to getting housing on private markets.

Education

Children with temporary protection can access education under the same conditions as country nationals in all Member States, except in Slovakia, where they do not have to attend school. A key challenge was that authorities lacked an overview of the number of school-aged displaced children in their areas. Another was that in some places schools did not have enough capacity, or were not well enough prepared, to teach displaced children and provide the educational support they need.

National and local authorities did not always coordinate with each other when distributing displaced children to enrol. That caused uncertainty for schools. Civil society organisations, volunteers and school administrations helped displaced children to integrate in school procedures.

Employment

All Member States granted access to employment, self-employment and vocational training. In the locations covered, only a small proportion of temporary protection beneficiaries found a job early on, but employment increased between November 2022 and March 2023.

Temporary protection beneficiaries mainly work in unskilled and semi-skilled occupations across the EU, despite being overqualified for these jobs. Local authorities and public employment agencies tried to make it easier to employ temporary protection holders but faced several challenges. Few beneficiaries registered with public employment services in Austria and Belgium. Procedures for recognising professional qualifications are burdensome and lengthy. Limited availability of childcare is a key barrier, as most temporary protection beneficiaries are women, many of them with children.

Healthcare

Local healthcare providers already had bottlenecks in their systems. They faced additional challenges specific to temporary protection beneficiaries. Those included additional administrative burdens, unclear, insufficient or delayed health insurance coverage, language barriers and uncertainty on identifying and providing for people with special needs.

Priority actions

Based on the information collected, the European Union Agency for Fundamental Rights (FRA) identifies 12 priority actions for EU Member States, local authorities and the European Commission in line with the requirements of Articles 13 and 14 of the Temporary Protection Directive. These actions build on FRA's findings in previous reports on displaced people's

experience in the EU, and the series of bulletins.

Cross-cutting issues

- Temporary protection is limited in time and not viable in the long term. That particularly affects beneficiaries' chances of getting housing and employment contracts. Long-term solutions could enhance integration into the labour market. Healthcare and education rights must also, in the long run, go beyond the limited scope set out in the directive and be implemented in light of the Charter of Fundamental Rights of the European Union (the Charter).
- This is necessary because possible restrictions, for example, to accessing emergency care or excluding adults from the general education system, could affect the full enjoyment of these rights in practice if they were applied in the long term. Member States should therefore consider alternative options for legal status, including simplified access to access to long-term residence. This would help ensure rights-based and sustainable solutions for people displaced by the war who reside in the EU. That is all the more necessary because many intend to stay, with 38 % of respondents to FRA's survey in 2022 said they would like to stay in their host countries.
- Coordination between national and local authorities on expected arrivals should be as timely as possible. It should include information concerning education and possible special care needs. They should share this information with schools and healthcare units to ensure better planning. National and local authorities should also coordinate how they assign displaced children to schools, so that they can keep track of the number of children registered in compulsory schooling and their educational paths.
- Improving data collection at local level on the number of resident temporary protection beneficiaries, including children, would help with planning municipal housing and adjusting education and childcare capacities. Local authorities should collect such data more systematically. This would also facilitate the early identification and use of EU and national funding tools and other support (for example schools receiving funds per pupil).
- Concerning people with special needs, local and national authorities should interpret the directive broadly. In case of future arrivals, they should prepare to assist people with special needs other than just unaccompanied children and people who have undergone torture or violence, whom the directive mentions as examples. In particular, they should include persons with disabilities, to comply with obligations under the UN Convention on the Rights of Persons with Disabilities. National authorities should provide guidance to local authorities on how to address special needs in housing, education, employment and healthcare.

Access to housing

- To support long-term housing solutions, local authorities could consult the various practical measures in this report. Practical measures include repurposing public facilities,

cooperation with private sector actors and ways of supporting the transition into independent rental agreements. EU and national funding should be adjusted for changes in occupancy and arrivals, to enable local authorities to secure long-term housing.

- Where they use private accommodation offers, local authorities should develop mechanisms ensuring systematic prior vetting to rule out safety concerns, in line with the Safe Homes Initiative and guidance of the European Union Agency for Asylum. They could work with non-governmental organisations to do this.

Access to education

- Local authorities should strengthen efforts to ensure that displaced children are integrated in schools and childcare facilities as early as possible, with due consideration for their language and culture. To help them start attending regular school, preparatory classes should be an integral part of regular curricula and school activities.
- Parallel online schooling offered by Ukrainian schools can be a significant burden on children if schedules or curricula of Ukrainian and Member State schools are not compatible. This report presents examples of practical efforts to consider compatibility with Ukrainian curricula. Local authorities are encouraged to consult them.

Access to employment

- National authorities should make sure that procedures for employing temporary protection beneficiaries are flexible. This includes recognition of professional qualifications and facilitating access to the labour market for professions in demand, such as healthcare professionals.
- National authorities should address the structural barriers that stop temporary protection beneficiaries getting jobs. This includes increasing the provision of high-quality language courses, facilitating quick and affordable procedures to recognise qualifications obtained abroad and establishing adequate and affordable childcare facilities for Ukrainian temporary protection beneficiaries of working age (mainly women) who have family and care responsibilities. Issuing residence permits quickly would further facilitate the employment of temporary protection status holders.
- Public employment services should provide tailored and targeted assistance to workers with temporary protection, to help them get jobs. Workers with temporary protection should be encouraged to register with public employment services and supported to do so.

Access to healthcare

- To ensure that the requirements flowing from Article 13 (4) of the Temporary Protection Directive and Article 35 of the Charter work as they should, local and national authorities

should continue addressing practical obstacles to providing healthcare. That includes clearly communicating to beneficiaries and healthcare professionals about healthcare rights and setting up procedures for involving interpreters. Where healthcare rights depend on temporary protection permits, the competent national authorities should make sure healthcare rights are accessible while permits are pending.

Introduction

Russia's invasion of Ukraine on 24 February 2022 forced more than 650,000 people to flee to neighbouring EU Member States in just one week. A year later, some 3.9 million had registered for temporary protection in the 27 EU Member States. This report covers places in Member States where more than 3.1 million of them had registered.

Cities and regional local authorities were among the first responders to the sudden arrival of people from Ukraine in high and unpredictable numbers. In many cases, local authorities were already under strain. They were struggling with the impact of the COVID-19 pandemic, rising energy prices, saturated housing markets and a lack of teachers and healthcare staff. This situation made it challenging to develop effective local responses to people displaced from Ukraine.

Remarkable cooperation between authorities, civil society, businesses, private individuals and communities helped local authorities to overcome the challenges of the first months. Many uncertainties remain, however, concerning long-term solutions that may be needed.

In EU law, the Temporary Protection Directive (2001/55/EC) (TPD) entitles people displaced from Ukraine to apply for and receive temporary protection. Those who hold temporary protection status enjoy a number of rights concerning key areas of life. The directive binds all Member States covered in this report. When implementing the directive, like any EU law, Member States must apply the Charter of Fundamental Rights of the European Union (Charter), according to Article 51 of the Charter.

The TPD was activated in March 2022, for the first time since its adoption in 2001 [1]. Implementing its provisions required unprecedented coordination and cooperation among Member States and their respective administrations (at various levels), Commission services, agencies of the European Union – including the European Union Agency for Asylum (EUAA), the European Border and Coast Guard Agency, Europol and the European Union Agency for Fundamental Rights (FRA) – the European External Action Service and international organisations. After one year of implementation activities, EU Member States have, in line with their national, regional or local capacities, incorporated the provisions of the TPD into their national and/or regional law to establish and fulfil a comprehensive and harmonised set of rights.

This FRA report looks at 26 locations across 12 EU Member States. It examines the key measures that local authorities took and the challenges they faced in ensuring access to housing, education, employment and healthcare. It complements the results of FRA's survey on people displaced from Ukraine published earlier this year (see box FRA Fleeing Ukraine survey (2023) below).

FRA Fleeing Ukraine survey (2023)

FRA collected experiences of people displaced from Ukraine in an online survey conducted in August–/September 2022 in 10 EU Member States: Bulgaria, Czechia, Estonia, Germany, Hungary, Italy, Poland, Romania, Slovakia and Spain. A total of 14,685 respondents (87 % women, 2 % children aged 12–17) told of their experiences in the EU concerning housing, employment, education, healthcare, language learning, social and economic integration and discrimination.

For each of the four areas of life that the TPD regulates – housing, education, employment and healthcare – the report illustrates support measures that local authorities took acting as duty bearers to ensure the fulfilment of rights. This includes examples of the challenges they faced in their efforts, as well as practices that worked well at local level and could be replicated. It showcases examples that local authorities and other sources flagged recurrently and considered relevant during the research period (August 2022 to March 2023). In addition to desk research and consultations with local authorities, the report draws on responses from local support organisations.

The report also highlights key legal provisions, examples of promising practices and relevant results from the FRA Fleeing Ukraine survey conducted in 2022 (see also Annex 1 – methodology).

The focus on local authorities brings a new perspective, complementing existing publications on displaced people from Ukraine, for example by the European Migration Network [2], the EUAA [3], the UN Refugee Agency [4] and, on access to employment, Eurofound [5]. These publications examine responses at national, EU and international levels.

The analysis in this report takes a fundamental rights perspective, reflecting the fact that the rights granted under temporary protection correspond to fundamental rights consecrated by EU and international law.

EU legal and policy framework

On 2 March 2022, the European Commission proposed to activate the TPD to offer quick and effective protection to those fleeing the war. The directive was adopted in 2001 to address situations of mass arrivals of displaced people and had never been activated. On 4 March 2022, in an unprecedented move, the Council adopted implementing decision 2022/832. It established the existence of a mass influx of displaced people from Ukraine and, as a result, introduced temporary protection for displaced people from Ukraine.

The temporary protection regime was initially adopted for a period of one year, until 4 March 2023. It was subsequently prolonged twice for one year each time, until 4 March 2025. That is the

maximum duration possible under EU law.

The Council implementing decision distinguishes between three specific groups of people to whom temporary protection applies:

- those to whom Member States *must* grant temporary protection, including Ukrainian nationals and international protection beneficiaries in Ukraine before 24 February 2022 and family members of both (Article 2(1));
- people on whom Member States should confer temporary protection or other forms of adequate protection under national law, including third-country nationals with valid residence permits in Ukraine before 24 of February (Article 2 (2));
- people to whom Member States may decide to grant temporary protection, including all other stateless persons or third-country nationals unable to return to their country or origin (Article 2 (3)).

Even if displaced people do not fall under the scope of protection, they can pass through the EU to return to their countries of origin.

The directive entitles beneficiaries to several rights and benefits. They include the four basic rights covered in this report: access to housing and social welfare, employment, education and healthcare. The report focuses on the rights of temporary protection beneficiaries and the role of local authorities as duty bearers under the directive.

National level legislation and policy have determined the exact scope of beneficiaries' entitlements. They leave relatively limited room for manoeuvre for local authorities to adopt specific measures.

Local authorities have had to deliver on these rights in practice and ensure the accessibility and quality of support provided to access these rights. This has meant, for example, ensuring that sufficient adequate facilities are available, that beneficiaries and public service staff know the applicable rights, that administrative procedures do not complicate access to rights, that social infrastructure is sufficient and that financial resources are available promptly. Depending on the administrative organisation of the Member State, local and regional authorities may also share powers and be responsible for certain tasks in some policy areas, for example providing and managing certain types of state-run accommodation facilities or funding educational institutions and healthcare facilities, whereas local-level leeway concerning employment is typically limited.

The Charter binds Member States, including local authorities, when they implement the TPD through their national legislation (Article 51 (1)). They must therefore apply the directive in light of the Charter, including for example human dignity (Article 1), as a component of an adequate standard of living, the right to social and housing assistance (Article 34), the right to education (Article 14), the right to engage in work (Article 15), the right to access to healthcare (Article 35) and the right to life (Article 2).

Most of the Charter rights apply to all people, including non-EU nationals. Some are restricted to

EU citizens or lawful residents only, for example access to the labour market in any EU Member State or the right to vote in EU elections. Secondary EU law further defines the rights of specific third-country nationals other than temporary protection beneficiaries in the four areas that this report covers. Those third-country nationals include, for example, asylum applicants, long-term residents, blue card holders and people in return procedures [6].

Legal corner

International human rights law requires that everyone should enjoy an adequate standard of living, the right to education and the highest attainable standard of physical and mental health (*).

All 12 Member States covered in this report, except for Czechia and Poland, have ratified the European Social Charter (Revised) of the Council of Europe. It includes generally applicable standards concerning the right to housing (Part I, Article 31) (**), the right of children to education (Article 17), the right to work (Article 1) and the right to protection of health (Article 11). Although the scope of the European Social Charter is limited to lawfully resident third-country nationals (Appendix), the European Committee of Social Rights recognised that the rights to shelter for children and to healthcare are closely connected to the rights to life and human dignity, which are absolute rights, cannot be restricted and thus apply to everyone.

All Member States are bound by the UN Convention on the Rights of Persons with Disabilities. It requires states parties to ensure that all categories of rights apply to people with disabilities.

(*) See the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, Convention on the Rights of the Child and International Labour Organization conventions. For an overview of the main international law provisions on housing, education, employment and healthcare, see FRA, *Integration of young refugees in the EU: Good practices and challenges*, Publications Office of the European Union, Luxembourg, 2019, and FRA, Fundamental rights of migrants in an irregular situation in the European Union, 2014.

(**) Austria ratified the European Social Charter (Revised) on 20 May 2011 but has not accepted Article 31.

The European Commission published operational guidelines to help Member States apply the temporary protection regime. The European Commission also issued a 10-point plan for stronger European coordination on welcoming people fleeing from Ukraine. The plan established an EU platform to register temporary protection beneficiaries and other people with protection under national law, so Member States could exchange information, avoid multiple registrations and limit possible abuse of the system. There is also a Solidarity Platform, which coordinates the

operational response to displacement from Ukraine and discusses the implementation of the 10-point plan.

The TPD confers a set of rights on beneficiaries of temporary protection. Once a person qualifies for temporary protection, Member States must provide them with a residence permit for the duration of the protection. Member States must also provide beneficiaries with a document certifying temporary protection status.

To help provide information for displaced people, the European Commission has created a multilingual platform with information for people fleeing the war in Ukraine. On the four thematic areas in this report, the Commission has issued recommendations and guidance documents. They build on the existing action plan on integration and inclusion 2021–2027.

Concerning housing, the TPD stipulates in Article 13 (1) that Member States must ensure that temporary protection beneficiaries have access to suitable housing or can receive the required means to obtain accommodation. The EU has adopted the 'Safe Homes' initiative as part of the 10-point plan.

The Commission published key guidelines for Member States on how to ensure that private housing initiatives for displaced people from Ukraine are suitable. The guidance contains advice on measures to support hosts and to match appropriate hosts with people in need of accommodation. It provides key principles on how to guarantee that private housing is safe and secure.

Under the TPD, temporary protection beneficiaries under 18 years of age must have access to education on the same conditions as nationals of the host Member State (Article 14). If they are older, it is at the Member State's discretion.

The European Commission also published guidance on supporting the inclusion of displaced children from Ukraine in education. It emphasises that access to education for unaccompanied minors should be facilitated as soon as possible, even when the appointment of a guardian/representative is ongoing and the type of care that the child is entitled to is still being determined. To implement the TPD measures effectively, EU Member States must coordinate and facilitate processes related to temporary protection within their territories.

Member States must allow temporary protection beneficiaries to engage in employment or self-employment, subject to the rules applicable to each profession, and in other activities, including educational opportunities for adults, vocational training and practical workplace experience (Article 12). The European Commission issued guidance for access to the labour market for Member States to do this.

The EU has also taken a set of initiatives to facilitate labour market integration. European Employment Services has developed an EU Talent Pool Pilot. It brings together job vacancies and the CVs of temporary protection beneficiaries in a single portal. In mid-2023, the system was operational in seven Member States (Croatia, Czechia, Lithuania, Poland, Slovakia, Spain, Sweden).

The EU skills profile tool for third country nationals has become available in Ukrainian. Non-EU nationals can fill it in and use it in interviews, for example with employment services.

To aid integration in the labour market and in education, the European Commission issued a recommendation on the recognition of qualifications for people fleeing Russia's invasion of Ukraine and a comparison report of the European qualifications framework and the Ukrainian national qualifications framework.

The recommendation aims to ensure that temporary protection beneficiaries can access jobs that correspond to their qualification level. It encourages Member States to minimise the formalities for recognising professional qualifications. For example, they could establish fast-track procedures for temporary protection beneficiaries, accept other types of proof than original documents or make the procedure free of charge.

The recommendation also contains guidance concerning regulated professions. Regarding academic recognition, the European Commission proposes the automatic recognition of Ukrainian higher education qualifications that meet certain requirements. It encourages Member States to accept a recognition decision made in another Member State. There is also guidance on how to deal with incomplete evidence.

Under the TPD, people it covers are also entitled to social welfare if they do not have sufficient resources. They also have a right to medical care. It must include at least emergency care and essential care for illness (Article 13 (2)). Furthermore, Member States must provide assistance to temporary protection beneficiaries with special needs, including unaccompanied children, and people who have undergone torture, rape or other serious forms of psychological, physical or sexual violence (Article 13 (4)).

In April 2022, 90 % of displaced people were women and children. That heightens risks of exploitation and of trafficking in human beings. The EU anti-trafficking framework provides for measures to address trafficking in human beings. The anti-trafficking directive and the EU strategy on combatting trafficking in human beings (2021–2025) contain preventive measures as well as measures to protect victims.

To address the specific risks that people fleeing the war in Ukraine face, the EU has adopted a common anti-trafficking plan under the lead of the EU Anti-trafficking Coordinator, as part of the 10-point plan. It includes actions for EU agencies, including FRA, and the European Commission to raise awareness of the risks of trafficking in human beings, to set up helplines, to reinforce prevention of trafficking, to enhance the law enforcement and judicial response to trafficking and to strengthen the early identification, support and protection of victims.

Several EU funds have been opened to help implement the TPD in the Member States. The European Commission introduced the flexible use of funding available from the 2014–2020 cohesion policy funds and set up a Ukraine reconstruction platform to ensure coordinated support for Ukraine's reconstruction. The regulation on cohesion's action for refugees in Europe allows Member States and regions to use or reallocate resources from either the European Fund

for Regional Development or the European Social Fund for any type of measures to support people fleeing Ukraine. The asylum, migration and integration fund (2021–2027) and the extension of Home Affairs funds for 2014–2020 also offered Member States the flexibility to finance measures in support of hosting those displaced by the war. Additional resources come from the recovery assistance for cohesion and the territories of Europe funds under the new instrument NextGenerationEU, amounting to € 50.6 billion, in addition to cohesion allocations for 2021–2027.

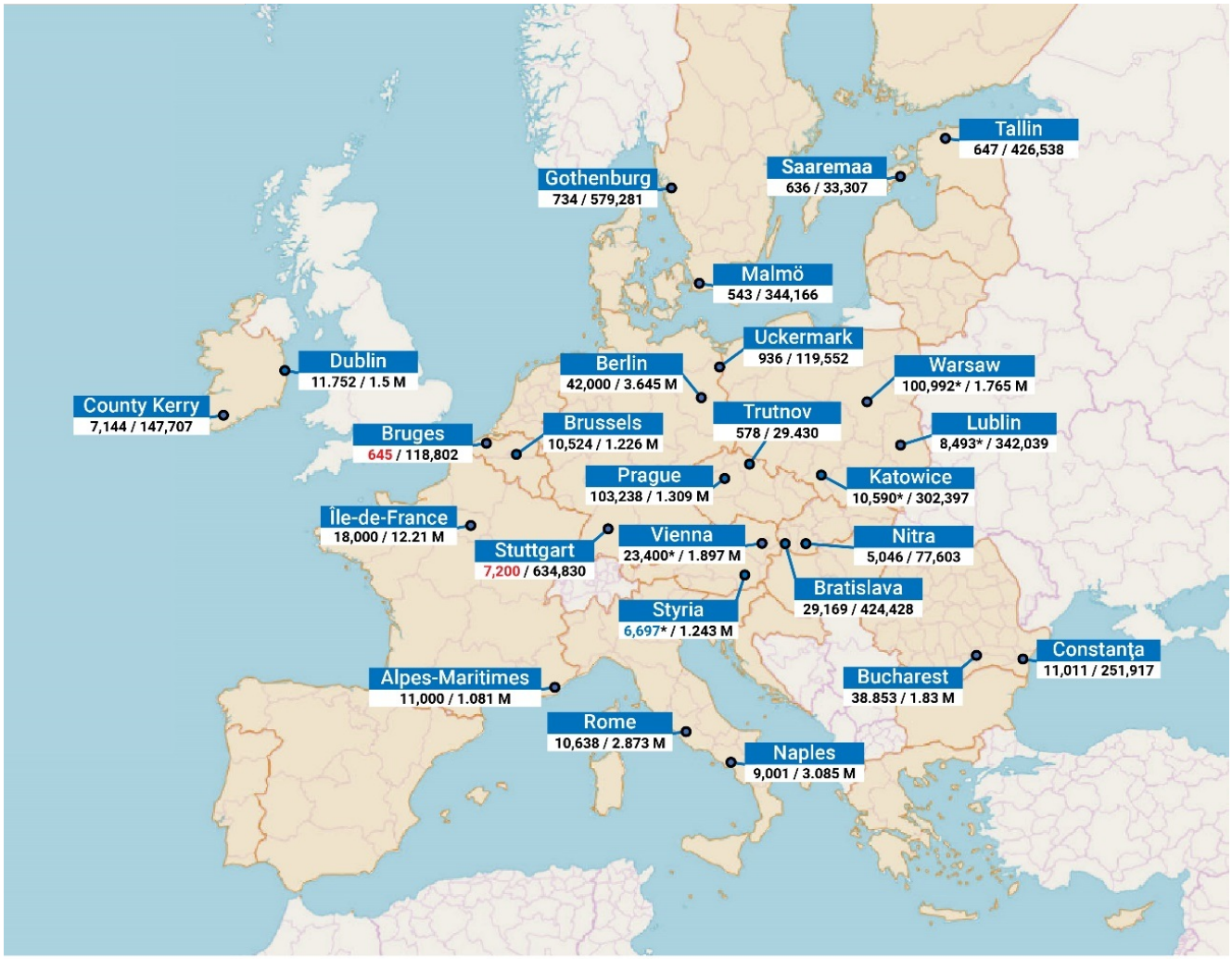
Methodology and selected locations

This report builds on desk research and interviews with local authorities between November 2022 and March 2023, and online consultations with local support organisations in May and June 2023 (see Annexes 1–3). Questions focused on local measures to ensure access to rights granted under temporary protection, and on challenges arising in practice. They covered four thematic areas: housing, education, employment and healthcare.

The report covers 26 diverse locations. They were selected to show how challenges in supporting high numbers of displaced people were addressed in different settings. The main selection criteria were the number of temporary protection registrations and diversity in geography, administrative organisation and prior experience.

All these locations had received many displaced people since the beginning of the war and made tremendous efforts to ensure their timely access to rights provided under the TPD. Figure 1 shows the total number of temporary protection registrations per location, reflecting figures from January 2023 in most cases, and then the number of inhabitants.

Figure 1 – Map of selected locations: total numbers of displaced people registered for temporary protection and inhabitants



■ Data as of Jan/Feb. 2023 ■ Data as of Nov/Dec. 2022 ■ Data as of July 2022

* For AT locations: registrations in basic care; for PL locations: 'PESEL UKR' *(Personal identification number for Ukrainians)* holders.

Source: FRA, June 2023

Alternative text: A map showing locations ranging from County Kerry in the west to Constanța in the east, and from Tallinn in the north to Naples in the south. The largest number of displaced people registered for temporary protection is 103,238 in Prague, which has 1,309,000 inhabitants. The smallest number of displaced people registered for temporary protection is 543 in Malmö, which has 344,166 inhabitants. The largest population is 12,210,000 in Île-de-France, which has 18,000 displaced people registered for temporary protection. The smallest population is 33,307 in Saaremaa, which has 636 displaced people registered for temporary protection. Data for registered displaced people is as of January or February 2023 except for Stuttgart and Bruges which is from November or December 2022. Data for Styria is from July 2022.

In terms of geographical diversity, the list includes national capital cities, provincial capitals (for example Katowice or Naples), rural locations such as the district of Uckermark in Germany, and regions such as the Brussels Region in Belgium or County Kerry in Ireland. Locations include large cities, such as Gothenburg and Malmö, the second and third largest cities in Sweden, and smaller locations, such as the city of Trutnov in Czechia with 29,430 inhabitants or the island of Saaremaa in Estonia. Others are very near Ukraine, such as the city of Lublin in Poland.

Locations differ in terms of wealth. For example, Bruges is one of the wealthiest cities in Belgium, whereas in the neighbouring Brussels Region the average income per inhabitant is 21.5 % lower than the Belgian average. Some cities, such as Nice in the Alpes-Maritime department, attracted displaced people who were more affluent and already had ties to this area of France.

Some locations had previous experience in dealing with large-scale arrivals of refugees and local integration policies. Malmö, for example, played a key part in receiving Syrian refugees in 2015. Others had been home to large diaspora communities of Ukrainian citizens before the war, for instance Stuttgart, Berlin or Warsaw, in contrast to Bucharest or Constanța.

Some of the locations – for example Vienna and Graz (the regional capital of Styria) – were able to draw on their experience as human rights cities or members of the Eurocities network: Tallinn, Malmö, Nice, Katowice, Gothenburg, Brussels, Berlin, Warsaw, Vienna, Constanța. Through the Committee of the Regions, some cities and regions also participate in the European alliance of cities and regions for the reconstruction of Ukraine and various partner forums as well as city-to-city partnerships, which also include Ukrainian cities. All this experience has been useful in responding to the arrivals and may in future help to reintegrate temporary protection beneficiaries returning to Ukraine.

Cities' initiatives to hosting people fleeing Russia's war of aggression against Ukraine

FRA published a report on experiences of EU cities, including Human Rights Cities, concerning their support to people fleeing Ukraine.

Based on responses to a questionnaire, the report provides an overview of the measures taken in Barcelona, Budapest, Cologne, Gdansk, Ghent, Lund, Nuremberg, Salzburg, Utrecht and Vienna to help displaced people access accommodation, education, employment, healthcare, food and social support.

Source: FRA, 'How did cities welcome displaced people from Ukraine?', *2 February 2023*

1. Housing

Housing is an immediate priority upon arrival. Adequate housing is also key for people to access other rights under the TPD, including education, employment and healthcare, and ensure the continuous enjoyment of them (see 'Legal corner').

Legal corner

Article 13 of the TPD requires Member States to ensure that people enjoying temporary protection have access to suitable accommodation or, if necessary, receive the means to obtain housing. They must particularly assist people with special needs, such as unaccompanied children or people who have undergone torture, rape or other serious forms of violence.

The Charter protects the right to housing assistance, to ensure a decent existence for all those who lack sufficient resources. Everyone residing in the EU legally is entitled to social security benefits (Article 34). Housing also supports the right to human dignity (Article 1), which applies to all people.

Many international instruments, including the European Social Charter, reflect the right to an adequate standard of living. Housing is a component of that.

All Member States covered in this report accepted as an aim of their policies that everyone has the right to housing (Part I of the European Social Charter (Revised)). Only France, Italy and Sweden have so far agreed to promote adequate standards, prevent homelessness and take measures to ensure affordability of housing (Article 31).

Most Member States align housing benefits for temporary protection beneficiaries with those of citizens or those of international protection beneficiaries. Sweden aligns benefits with those of asylum applicants.

In Poland, non-Ukrainian temporary protection beneficiaries covered by the Act on Granting Protection can either stay at centres for foreigners or get a cash benefit to cover the costs of stay. However, non-governmental organisations (NGOs) consider the amount grossly insufficient, at PLN 25 (€ 5) per day for a single person. In contrast, the Special Act on Assistance to Ukrainian Citizens applies to Ukrainian citizens and immediate family members. It gives temporary protection beneficiaries access to several medium-term housing options, like international protection beneficiaries or Polish nationals.

1.1 Measures facilitating access to housing

National authorities generally organise emergency accommodation, but regional or municipal authorities often organise regular reception facilities (Belgium, Italy, Sweden). This section describes four key measures that local authorities took to facilitate access to housing and provides examples of them. These were largely new tasks, but local authorities also used or extended existing coordination mechanisms.

1.1.1 Coordination between authorities and with NGOs

The arrival of displaced people from Ukraine increased the need for coordination between local and central authorities and cooperation with NGOs.

Coordination between local and central authorities concerned, for example, the identification of available spaces. In Styria, Austria, the Integration Centre Styria reported that many municipalities notified it of available housing capacity [7]. In Belgium, local authorities indicated their offer of private and public crisis accommodation via the regional government to the federal asylum agency (Fedasil). It needed the consent of the local coordinator before assigning places to new arrivals [8].

Whereas many displaced people decided for themselves where to go, central and local authorities took measures to distribute new arrivals across the country. In Germany and Sweden, the central authorities assigned temporary protection beneficiaries to regions according to quotas, considering individual circumstances as far as possible. City authorities in Gothenburg reported difficulties in getting information about this from the Swedish Migration Agency [9].

In Sweden, displaced people are generally not eligible for housing for homeless people. Beneficiaries choosing to organise housing elsewhere may lose their eligibility to financial assistance depending on their choice of location.

Coordination at municipal level involved different services. The Sint-Jans-Molenbeek municipality in the Brussels Region, Belgium, created a Housing Advisory Council, which brings together all the relevant operational actors and municipal services to reflect on questions regarding housing and formulate solutions [10]. The National Association of Italian Municipalities issued guidelines to support the social services of municipalities that host temporary protection beneficiaries. For example, the document explains how to access funds.

Not all cities relied on coordination mechanisms to the same degree. The city authorities in Gothenburg, Sweden, had no clear forms of collaboration within the city to respond to temporary protection arrivals [11]. Malmö, on the other hand, relied on a contingency plan for cooperation with municipal organisations. It had developed the plan in response to the large-scale arrival of refugees in 2015. The plan defines tasks, forums, staffing issues, and logistical and legal issues related to the security of premises. In 2022, the city set up an operational group involving those who managed these tasks in 2015, to respond to the arrivals from Ukraine [12].

Cooperation with NGOs allowed accommodation to be available at short notice. Many local

authorities strengthened existing agreements for the reception of refugees. On behalf of the Vienna Social Fund in Austria, for example, the NGO Diakonie Refugee Service coordinates the examination and arrangement of private housing pledges, because it is expert in the field of housing [13]. In Graz in Styria, NGOs also provide housing funded by the regions within the basic care system [14].

In France, each prefecture, a regional administration of the Ministry of the Interior, designates an NGO to refer displaced people to accommodation providers, ensure the quality of arrival arrangements and provide follow-up and social support. The NGO, the host and the accommodated person(s) sign a tripartite agreement, described in a circular of the Ministry of Housing and the Ministry of Social Economy, specifying the obligations of each party.

Stuttgart, Germany, adjusted municipal structures in response to the large-scale arrivals of refugees in 2015–2016. That facilitated fast cooperation between volunteers and the city administration.

In Naples, Italy, NGOs provide information on housing options and operate service desks together with local authorities. The arrangements are based on adapted EU Asylum, Migration and Integration Fund projects, such as the Impact Project, extending support to displaced people from Ukraine, including housing opportunities [15]. Gothenburg, Sweden, managed to swiftly open two evacuation shelters (Skyddsvärnet and Räddningsmissionen) based on partnerships with NGOs [16], and to facilitate private accommodation as required.

1.1.2 Supporting safe access to private accommodation

FRA survey findings on private accommodation

Nearly six out of ten respondents were staying in private apartments or houses. Of those, more than half were paying in full or in part for their accommodation, according to FRA's Fleeing Ukraine survey.

Source: FRA (2023), Fleeing Ukraine, 28 February 2023

Private offers made up to 90 % of available places, for example in Brussels and Berlin [17]. Local authorities supported private housing arrangements through several measures, including counselling, providing model contracts and translations, and offering subsidies, guarantees and mediation. The following examples indicate the variety of actions taken.

In Vienna, the NGO Diakonie Refugee Service, supported by social services, runs a telephone hotline for 'housing donors'. In Graz, the city housing office covers the operating, heating and electricity costs of 20 municipal flats provided to displaced people based on a 'temporary contract' (*Prekariumsvertrag*) [18] between the city and the displaced people. Unlike a tenancy, such a temporary contract is provided for a short time without rent charges and can be terminated

at any time without notice. The temporary contract is in both German and Ukrainian.

Similarly, in Belgium, France and Slovakia, local authorities have facilitated contracts with private hosts.

The Brussels government, for example, provides a model temporary occupation agreement (available in Dutch, English and French). The agreement sets out the main obligations of the parties, the duration and the maximum contribution that can be requested from temporary protection beneficiaries (€ 150 a month for an adult). The region also provides a model cohabitation charter that can inform the practical arrangements of the parties. Bruges organised info sessions for potential host families, offers the host families a volunteer agreement (including civil liability insurance) and can provide a model user agreement in Dutch to be signed by the host family and the temporary protection beneficiaries [19]. The benefit for hosts is the guarantee that the social services will offer administrative and practical support and can take (financial) responsibility if necessary and mediate in the event of conflict [20].

In France, the NGO designated by the prefecture drafts a tripartite agreement, including the term of the contract and the period of notice in French. Translation depends on the personal initiative of Ukrainian- or Russian-speaking staff.

In Nitra, Slovakia, the municipality collects private housing pledges and helps accommodation providers with contracts and other formalities through COMIN, the contact point for arrivals providing community-organised services [21].

Promising practice: screening and matching support (Dublin)

The International Organization for Migration in Ireland screens and assesses private housing offers before referrals. It works together with the city and county councils, or the Irish Red Cross in some cases. Written agreements clearly outline the responsibilities of host families, each party's main obligations and the durations of the contracts. They are provided in multiple languages to each party.

In addition, the local authorities meet with the households from Ukraine and the pledgers to ensure a workable and suitable living arrangement, considering special needs or adaptations for people with disabilities. After a household is successfully placed into a pledged home, a designated contact point supports the pledger and the household. The community department in local authorities, such as Dún Laoghaire-Rathdown, gives support in areas such as cultural differences, language barriers, integrating with the community, and accessing services through local social inclusion and community activation programmes.

Sources: consultation with Dún Laoghaire-Rathdown County Council, 27 January 2023; IOM

1.1.3 Provision of information

Local authorities organised the provision of information on housing options for temporary protection beneficiaries through specific websites, online housing tools, counselling and hotline offers.

In Belgium (see also 'Promising practice' box below), the Brussels regional government created an online platform called 'Bemyguest.brussels'. Through it, host families can register accommodation pledges and get support. In Woluwe-Saint-Pierre, a dedicated team of PCSW staff helps hosts and displaced people alike with questions concerning housing in the municipality [22]. The municipality also created a meeting point for temporary protection beneficiaries in a local community centre, where the PCSW housing team is regularly available.

In Ireland, local authorities are appealing to people who have unoccupied properties to offer them as temporary homes for at least six months. The main government website highlights it. Under this initiative, local authorities connect with owners to assess suitability, and then make it possible for temporary protection beneficiaries to live there.

Early referral to accommodation was made possible in Lublin, Poland. The municipal police (city guard) and the City Crisis Management Centre actively anticipated the arrival of displaced people in need of housing. They monitored the situation at the main entrances to the city, in streets and in car parks and directed those in need to places of temporary accommodation, according to the local authorities.

In Slovakia, the Human Rights League provides temporary protection beneficiaries with information on accommodation. It tells them what financial contributions of the Ministry of the Interior makes to accommodation, and how to distinguish private rental advertisements from those by real estate companies [23].

Promising practice: accessible housing advice (Bruges)

Bruges employs 'guides in diversity' (toeleiders in diversiteit) at the administrative centre of the city where temporary protection beneficiaries get their residence permit and register their address. They combine professional expertise with personal integration experience. They are available both online, including WhatsApp, and by phone. They can also accompany people to specific services in person.

The city social services (PCSW) created a team of social workers to assist displaced people in finding housing, including alternatives if they have to move. Subject to specific conditions, temporary protection beneficiaries may benefit from other housing-related assistance that the PCSW provides. That includes help to put together a rent deposit or buy furniture, and activities such as 'housing cafés', where people obtain assistance in their search for housing on the private market.

Sources: Coordinator of the City Council, 27 January 2023; coordinator of the PCSW, 23 January 2023; Association for Flemish Cities and Municipalities*; Vanneuville, M.*, '*Georgina en Irina zijn nieuwe "toeleiders in diversiteit" voor Oost-Europese vluchtelingen en migranten',* Het Nieuwsblad*, 16 May 2022*

1.1.4 Scaling up municipal/public capacities

Privately provided accommodation could not be sustained over time. Local authorities therefore sought to scale up municipal capacity to accommodate arrivals beyond emergency accommodation. They did this through innovative partnerships, increasing the density of occupancy of existing facilities, regulatory exemptions, and simplified administrative procedures for acquiring, repurposing or revitalising new facilities.

Bruges, Belgium, made collective accommodation places available based on temporary agreements with private partners, including former monasteries and hospitals. While this was a quick response to an emergency, most of these collective facilities closed after some months [24] . The city therefore increased its capacity through housing that the social housing company Vivendo temporarily made available. This included social housing that originally had been planned to be repurposed. In this way, the city plans to maintain the same housing capacity when collective facilities close [25] .

The Brussels Region joined forces with civil society, Ukrainian diaspora organisations and the private real estate sector to identify and adapt temporarily available buildings, creating 3,600 places in collective facilities. To simplify the creation of collective facilities, the Brussels government allowed a temporary exemption from requesting an urban planning permit for certain activities such as changing the purpose of a building or constructing temporary light or modular buildings or temporary infrastructure.

Stuttgart, Germany, scaled down the use of private offers and increased the use of reception facilities. About half (3,500) of the registered temporary protection beneficiaries were staying in collective facilities by January 2023 [26]. The City Department of Social Affairs rented hostels and hotels and converted two halls into reception facilities. The Baden-Württemberg Ministry of Justice and Migration issued a decree on 22 August 2022 allowing the temporary reduction of the minimum living and sleeping space within refugee accommodation facilities [27].

Berlin similarly expanded its accommodation capacity. It used a tent for up to 900 people, rented hostels and hotels temporarily, hosted more people in existing accommodation, simplified the procedure for acquiring new accommodation and used mass accommodation such as lightweight halls at the former Tegel airport for 3,000 displaced people and in the hangars at the former Tempelhof airport [28]. Human rights organisations criticised the lack of privacy, the security risks and the extra burden collective facilities put on the infrastructure of those districts.

Local authorities in Katowice and Warsaw, Poland, revitalised empty municipal and other buildings to make them usable for short- and medium-term accommodation. The University of Economics in Katowice, for example, is lending free of charge dormitories that have not been used for three years. In Warsaw, municipal authorities adapted office buildings for medium-term accommodation needs, an effective use of available premises [29].

1.2 Challenges to providing access to housing

With the arrivals from Ukraine, local authorities faced challenges in handling many new tasks. Besides the measures described above, they had to plan and increase municipal housing facilities, manage online housing tools, verify conditions for reimbursements, process allowances, vet accommodation facilities, maintain facilities, provide information and support services, and apply for additional funding. The uncertainty and unpredictability of long-term developments added to the challenges. They were often exacerbated by pre-existing tight rental markets and already overstretched resources.

FRA consultation finding on housing

About half of the 30 local support organisations that FRA consulted considered issues related to housing to be among the top challenges they face in supporting temporary protection beneficiaries. These included respondents from Bruges, Brussels, Dublin, Kerry, Tallinn, Stuttgart, Styria and Vienna.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

1.2.1 Planning uncertainty and overload

Major challenges for local authorities were the uncertainty of arrival numbers, the duration of their stay and whether temporary protection and the related reimbursement schemes for private accommodation providers would be extended, and, if so, for how long. In addition, fragmented data on locally residing temporary protection beneficiaries further affected their ability to plan.

For example, in Vienna, Austria, a major challenge to planning accommodation was the lack of reliable forecasts of housing needs [30] . Similarly, Bruges, Belgium, had no clear overview of the number of temporary protection beneficiaries planning to stay for long in the city [31] .

A municipal official in Trutnov, Czechia, illustrated the difficulty of keeping track of fluctuating numbers of temporary protection beneficiaries [32] . When repairing and temporarily evacuating a collective facility, local authorities found that only about 60 % of the people registered were still living at the site. At the same time, the municipality once only had two hours to find housing for 30 displaced people arriving from Prague.

Local authorities in Saaremaa, Estonia, did not know how many temporary protection beneficiaries the Social Insurance Board would be assigned to their location [33] .

In Uckermark, Germany, most temporary protection beneficiaries assigned to the district did not arrive on site directly, unlike in Berlin or Stuttgart. However, the dynamic situation meant that the admission quota was adjusted five times during 2022 and was not entirely reliable as a basis for planning [34] .

In Bratislava and Nitra, Slovakia, landlords and temporary protection beneficiaries were unsure how long the housing benefit would be paid or whether temporary protection would be extended. That affected housing security [35] . The cities have only partial data on temporary protection residents, as many stay in private accommodation (Bratislava) [36] , their documents mention another city indicated by the employment agency (Nitra), or the Ministry of Transport does not share data it collects on people staying in hostels (Nitra) [37] .

Human and financial resources were stretched to their limits and beyond to organise adequate housing solutions. In Brussels, Belgium, this resulted for example in some municipalities not managing to use or support the housing-matching tool Bemyguest.brussels [38] .

Local authorities in Stuttgart, Germany, could not accept many private flat offers because arranging the temporary renting, furnishing and occupation of individual apartments required disproportionate administrative resources. Conditions imposed by landlords often did not offer the flexibility the city administration needed or the flats did not meet the standard required.

Recruiting and keeping trained staff was challenging, making it difficult to deliver services. In Ireland, for example, local development companies seemed to be more agile and quick to react [39] . This was also the case in Gothenburg, Sweden [40] .

Promising practice: buddy system and self-management (Bruges, Brussels)

Social services (PCSW) in Bruges, Belgium, noted increased waiting times for responding to support needs. The main difficulty was to find qualified staff. The city and the PCSW therefore created a buddy project called 'Buddy's voor Oekraïne'. It matched resident volunteers to temporary protection beneficiaries as 'buddies' to help them with any questions concerning daily life in the city.

In Brussels, beneficiaries self-manage some collective facilities together with local organisations. A challenge remains the shortage of professional staff to provide adequate psychosocial, medical and legal assistance. That needs to be covered by often overburdened organisations or volunteers.

Sources: Interviews with the PCSW President, Bruges, 10 January 2023, the manager of the facility Hotel Leopold, Brussels, 6 February 2023, and the Ukraine Helpdesk of Caritas International, Brussels, 2 February 2023; 'Brugge promoot "Buddy's voor Oekraïne"'

1.2.2 Processing private accommodation offers

Privately provided accommodation is indispensable everywhere. However, local authorities have to check it to prevent risks of fraud, abuse, exploitation and human trafficking, and to process reimbursements. That is an administrative burden.

1.2.2.1 Vetting private offers

The European Commission Safe Homes Initiative points out the need for prior vetting to rule out safety concerns and ensure suitable and sustainable matches. It recommends practical measures such as background checks and regular on-site visits. It refers to detailed guidance from the EUAA on private accommodation. That lists, for example, information for authorities to share with hosts and with displaced people.

FRA survey findings on private accommodation

The most common problems with private accommodation were lack of privacy and sharing a kitchen or bathroom with strangers, according to FRA's Fleeing Ukraine survey. Almost one in five adult respondents said they did housework or care tasks in exchange for housing.

Source: FRA, Fleeing Ukraine*, February 2023*

Several locations reported that private housing offers could not be systematically vetted. Examples are in Austria, Belgium, Czechia, Estonia, Germany, France and Slovakia.

In Belgium, the federal government instructed local coordinators to check the criminal records of all adult host family members or representatives of companies offering accommodation, and of each adult residing in the accommodation. Social services in Bruges reported some inappropriate offers from people wanting to host single women; offers made via informal channels, such as social media, were difficult to control [41]. In Brussels, advance checks were not always feasible and took place only upon registration at the municipality [42]. Moreover, only the host's criminal record is requested and not the records of all family members.

FRA consultation findings on measures addressing risks of exploitation

Nine organisations that help temporary protection beneficiaries to find housing responded to FRA's request for information. Six of them were aware of specific measures to address risks of exploitation of displaced people from Ukraine in their regions. Only three considered these measures adequate. They mentioned information campaigns (Bucharest), socio-preventive units at the commune and local police (Brussels) and cooperation with NGOs (Vienna).

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

In Trutnov, Czechia, municipal officials vetted large-scale facilities. However, they had no specific guidance from the regional registration centres responsible for providing accommodation.

Municipal authorities in Estonia do not verify the suitability of private accommodation [43]. Authorities in Saaremaa noted two complaints requiring intervention between January and March 2023. [44]

In France, because the number of available facilities is limited, designated NGOs in charge of monitoring the quality of arrival arrangements can hardly afford to decline any offers [45].

In Ireland, thousands of private households offered to host children. Local authorities had to check them. Many eventually turned out either unsuitable or no longer available. A representative from Dún Laoghaire-Rathdown County Council noted the early challenges related to pledges through the Irish Red Cross, resulting in "huge confusion … from a general public perspective". The process became more streamlined as public agencies, local authorities and departments got involved, including the Departments of Children, of Justice and of Housing [46].

In Bratislava, Slovakia, private accommodation is not screened, nor is there any tool for monitoring [47]. However, NGOs are first points of contact if problems arise. The District Office regularly visits collective facilities [48]. In Nitra, social workers check the accommodation facilities once a month [49]. The COMIN centre has reported cases of suspected exploitation or fraud to the police [50].

Beneficiaries often did not know where to start looking for accommodation and the required administrative steps, according to NGOs interviewed. Moreover, landlords and support organisations often did not know whom to contact if they needed to resolve an issue related to housing. Information on reimbursement schemes was mostly in Slovak and in bureaucratic language; there was no leaflet to inform people who are not computer literate [51].

Promising practices: Online tool supporting vetting process (Warsaw)

Municipal authorities in Warsaw, Poland, created an online tool asking potential hosts to fill in a form to register for housing. Municipal staff vet all offers in advance and may make check-in visits during the guest's stay. Warsaw and Lublin local authorities also offer advice to private hosts. They consider the vetting mechanism effective.

Sources: Assistance and Social Projects Office of Warsaw, February 2023; Initiatives and Social Programmes Department of Lublin, February 2023

1.2.2.2 Reimbursing private providers

In several locations, privately provided accommodation may be reimbursed. Commercial providers such as hotels and companies, hosting displaced people may also apply for subsidies.

Local authorities are generally responsible for processing these payments after verifying that all conditions are fulfilled. They faced, however, several challenges in applying reimbursement schemes. Experts referred to the high workload of processing allowances, resulting in delays, and to complicated procedures, insufficient funds, irregularities and uncertainty about the continuation of reimbursement schemes.

Reimbursements were either direct to the providers or through agreements with the beneficiaries to share part of the allowances they receive. In Belgium, for example, local social services can agree to reduce beneficiaries' allowance and transfer the difference as a contribution to private hosts, subject to mutual agreement and a contract. The municipality of Schaarbeek temporarily covered energy costs during the months when temporary protection beneficiaries did not yet get a financial allowance from the social services [52].

In Poland, private hosts, hotels and recreation centres can claim PLN 40 (€ 8.90) per person per day for the first 120 days in Poland. Local public services verify these requests for compensation. In addition, the housing benefits directly provided to temporary protection beneficiaries need to be means-tested. They are subject to conditions and limited to six months.

In Romania, the '50–20 programme' allowed private hosts to benefit from a monthly payment of RON 50 (€ 10) per person per day and RON 20 (€ 4) per day for meals. County committees for emergency situations needed to approve landlords' requests for reimbursement, while the municipal authorities kept track of the number of days hosted and the amounts requested. In

Constanța, however, hosts reportedly did not always pass on the allowance received to their guests, and/or requested significant deposits. [53]

The programme was suspended in December 2022, and it was uncertain if it would resume. As a result, private hosts evicted people or stopped providing accommodation [54]. In March 2023, the Ministry of the Interior proposed to replace the system by a lump sum payment of RON 2,000 per month (€ 400) per family, irrespective of the number of its members. It was to be limited to four months, and paid to temporary protection beneficiaries directly.

Municipalities in Slovakia can authorise and process allowances to landlords if they receive a rental contract and, at the end of each month, landlords' monthly statements of the nights actually hosted. In addition, temporary protection beneficiaries must notify the municipality in person once a month during the period they are hosted. The municipality pays the allowance into the landlord's bank account or in cash upon receiving the funds from the Ministry of the Interior.

In Bratislava, some landlords receiving allowances also asked their guests for allowances [55]. Charges for accommodation or the consumption of water, electricity and gas are against the law [56]. Additional services such as internet access may be mutually agreed.

In Nitra, private landlords initially took an active interest in accommodating people from Ukraine, because of the allowances. This gradually faded because information about the extension of temporary protection and related allowances was unclear or late [57].

The Ministry of Transport paid hostels and accommodation providers. That was delayed in several cases. Experts in Bratislava attributed this to overstretched capacities at the ministry. It was unavailable to respond to requests [58].

The ministry failed to publish contracts, and it delayed the payment of allowances. As a result, a dormitory dropped out of the scheme that the ministry supported. As the allowance was reduced according to the actually incurred costs, it became less profitable for accommodation establishments [59].

Promising practice: IT solution for processing rent subsidy (Estonia)

In Estonia, temporary protection beneficiaries who move to a permanent residence can apply for a lump sum to cover the costs of concluding a lease agreement. Applicants must submit their lease agreement and receipts for expenses such as brokerage, deposit, purchase or repair of supplies to the local government for assessment. The maximum amount of the compensation is € 1,200, based on the Act on Granting International Protection to Foreigners (Article 73 (1)).

The state has created an IT solution for municipalities, which enables applications to be processed quickly. It excludes the payment of repeated benefits. The rent subsidy is a useful system that helps with the transition from temporary accommodation to long-term accommodation on the regular rental market, according to both Tallinn and Saaremaa local authorities.

Sources: Head of the Department for Supporting the Integration of New Immigrants, Tallinn City Government, 17 January 2023, and response to information request, Saaremaa Municipality Government, 12 January 2023

1.2.3 Responding to relocation needs

Local authorities responded to relocation needs arising for various reasons. For example, private offers were time-limited, people moved from emergency to more permanent accommodation, moved onwards to other locations or other Member States, or returned to and from Ukraine (see consultation finding box below). This created challenges in managing accommodation and school places, keeping track of eligibility to benefits and ensuring general integration.

FRA consultation finding on frequency of moves

Seven housing organisations responded to FRA's consultation question on frequency of changing accommodation. Four of them estimated that temporary protection beneficiaries changed their accommodation more than twice after their arrival on average.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

Temporary protection beneficiaries benefiting from basic care in Vienna, Austria, risk losing their place of residence in organised accommodation if they leave the city or Austria for more than three days. In addition, the authorities can reclaim wrongly received benefits when beneficiaries return to Austria [60]. Moreover, participation in integration measures such as German language courses or regular gainful employment is difficult in such cases. People displaced from Ukraine

who repeatedly return to Vienna can make use of the counselling services that the counselling centre offers.

In Poland, displaced people lose housing benefits if they spend more than one month outside Poland, but they can apply to renew their status upon return. When they need to move within the Member State or location because accommodation closes or is inadequate, social workers are usually the main point of contact. Local authorities in Austria [61] and Germany reported increasing moves from private to public accommodation as privately provided accommodation could no longer be sustained. In Bruges, Belgium, social services had to relocate on average four or five cases per week in January 2023 [62].

Relocation needs in Dublin, Ireland, arose when temporary protection beneficiaries had to leave student accommodation as the academic year began, or had to leave hotels at the start of the tourist season. Local authorities in Kerry relocated temporary protection beneficiaries, including many women and children, to new accommodation in the Killarney area because there was an acute shortage of accommodation nationally. Local communities in Killarney argued for them to stay in alternative accommodation. Eventually, such accommodation could be found. Beneficiary families expressed fear of losing jobs and having to move children integrated in local schools. An NGO expert highlighted the negative impact of these moves on children [63].

In Naples, Italy, displaced people had to move from an emergency reception facility to another, according to an NGO. Mediators had to intervene because there was no explanation, and no care had been provided for already existing trauma [64].

FRA consultation finding on intra-EU mobility

Only one of the 30 organisations that FRA consulted reported having been approached by temporary protection beneficiaries registered in another Member State. Most of the 30 participating support organisations had received requests for support from temporary protection beneficiaries registered somewhere else in the same Member State. In many of these cases, providing support proved to be more complicated than when beneficiaries were in the same area as the organisation. For example, in Vienna,

they needed additional administration to ensure that benefits were not provided twice.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

Promising practice: notification system for relocation needs (Brussels)

In Brussels, Belgium, the agency Bruss'Help created a notification system for when people need to leave their accommodation. Local authorities and aid workers can contact Bruss'Help to find alternative accommodation within the same municipality.

Bruss'Help encourages local authorities to use Bemyguest.brussels to register and find available places. If no solution is available, the agency will encourage the authority to temporarily book a room in a Brussels hotel via the online form of the Brussels Hotel Association and to continue the search. If still no solution can be found, Bruss'Help can refer people to a regional collective facility or a specific facility adapted to special needs, for example a retirement home.

Challenges remain. Notice is short, as the dispatch system is only activated if the person has to leave within seven days. Simultaneous need arises if collective facilities close down.

Sources: Bruss'Help, Circulair 8; consultation with the Coordinator for the Brussels Capital Region, January 2023

1.2.4 People with special needs

Adequately accommodating displaced people with specific needs was challenging because capacity was limited, vulnerabilities were identified unsystematically or late, and domestic legal provisions were vague.

In Vienna, Austria, each facility run by foundations, such as Diakonie or Caritas, has a care concept specially adapted to people displaced from Ukraine. Where necessary, they can provide mobile care services and can admit temporary protection beneficiaries, as basic care clients, to care or residential facilities for people with disabilities, after assessing their needs and subject to availability [65].

Berlin, Germany, decided in April 2022 to set up a clearing centre at the arrival centre to pre-screen people for vulnerabilities to consider in allocation. However, this had not yet been implemented by January 2023 [66].

In Dublin, Ireland, children with autism are not considered to have severe disabilities and are therefore not exempt from having to leave university and tourist facilities [67]. Only those with serious medical conditions were allowed to stay in the city in alternative accommodation. Conditions at temporary facilities such as the Citywest Transit Hub were found to be unsafe, particularly for children, and subsequently closed.

In Rome, Italy, around 120 people with serious vulnerabilities or disabilities, mainly elderly women, could be accommodated thanks to ad hoc agreements with organisations supporting access to

suitable housing. A multidisciplinary team identified their specific needs and health conditions during interviews at arrival and reception desks [68].

Warsaw, Poland, hosted about 2,000 people at medium-term accommodation centres in January 2023, including many vulnerable people [69]. As of March 2023, residents need to pay for their stay from 120 days after their first entry into Poland, unless they are in vulnerable situations. As most residents are vulnerable, this is difficult to implement.

In Bratislava, Slovakia, local authorities could accommodate vulnerable people only in mainstream facilities during the first months. Those were not always adequate [70]. Facilities included a dormitory specifically dedicated to mothers with children, and one wheelchair accessible facility [71]. In Nitra, some dormitories refuse to accommodate children below the age of 15 [72].

1.2.5 Durable housing solutions

Emergency accommodation was based on short-term agreements and unsuitable for longer stays (see survey finding box), and many private hosts started to reach their limits. Local authorities therefore had to phase in alternative housing solutions step by step, in line with the European Commission's Safe Homes guidance. This primarily entailed an increased focus on longer-term assistance schemes; private housing market solutions, including cooperation with real estate agencies and advice to beneficiaries on how to search and find private housing market solutions; and construction of modular housing to secure longer-term housing, going beyond six months.

FRA survey finding on long-term plans

More than a third of the respondents to FRA's Fleeing Ukraine survey (38 %) planned to stay in the current host country in the long term, or stay there and regularly commute to Ukraine.

Source: FRA, Fleeing Ukraine, February 2023

Social housing schemes play a limited role for displaced people from Ukraine, according to the research in most Member States covered. That is due to strict criteria to access them and long waiting times.

In Vienna, Austria, temporary protection beneficiaries can access social housing if, among other things, they have had their main residence in Vienna for two years [73]. In Belgium, temporary protection beneficiaries are eligible for social housing, but the waiting time is several years [74].

In Poland, temporary protection beneficiaries covered by the Special Act can immediately apply for social housing on an equal footing with Polish citizens. The Law on Protection regulates the situation of non-Ukrainian temporary protection beneficiaries but does not provide for access to social housing. In practice, social housing is extremely limited and not a viable solution for

temporary protection beneficiaries. Nevertheless, the mayor of Warsaw dedicated 60 flats of the local communal housing resources to Ukrainian citizens displaced by the war. Some were available from February 2023 [75].

Bratislava, Slovakia, has limited social housing. It is particularly inaccessible to temporary protection beneficiaries because of rigid rules. For example, they allow applications to be submitted only in Slovak [76].

Other than the housing assigned by the Swedish Migration Agency, the city of Malmö, Sweden, has no long-term housing plans [77]. The city of Gothenburg refers people to its official queuing system for accessing public rental apartments.

Rental markets had limited affordable offers in most locations. In Brussels, social services found it a challenge to persuade landlords to accept temporary protection beneficiaries as tenants [78]. Municipalities, such as Watermael-Boitsfort, started a partnership with real estate agencies. The Regional Public Service of the Brussels Region also employed people from the Ukrainian community to answer a free housing hotline and organise information sessions (housing tables) in Ukrainian, to help beneficiaries understand lease contracts and search for accommodation. They also served as interpreters on visits to properties, to facilitate initial contact with the landlord [79].

The administrative centre in Bruges hosts a housing desk (Woonloket). All city residents can get help there on all topics related to housing, such as information on rental legislation or social housing. Local authorities may also ask for support from the province, neighbouring municipalities or the Flemish support teams (Vlaamse Ondersteuningsteams) in the wider region. These teams help set up facilities for long-term accommodation [80].

FRA consultation finding on temporariness of protection status

Most of the nine housing support organisations that FRA consulted considered that the temporary nature of protection negatively affects beneficiaries' access to long-term housing, which would cover a stay of longer than a few weeks or months.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

In Île-de-France and Alpes-Maritimes, France, transitional accommodation became long-term for lack of affordable housing. One hundred and twenty temporary protection beneficiaries, including 30 children, moved to a residential hotel with a social purpose in Île-de-France in spring 2022. They were still living there in January 2023 [81]. Available social housing covers less than a third of the demand and is often located in remote areas in the least populated regions of France, which lack employment opportunities and public transport [82].

Conversion and refurbishment projects created additional yet limited long-term capacity and faced funding difficulties.

In Saaremaa, Estonia, the Sõmera complex is a former care home including 10 residential buildings. It was refurbished to offer long-term accommodation for up to 150 temporary protection beneficiaries. The welfare services company Hoolekandeteenused AS divided the buildings into apartment-like living units, ensuring privacy, and will rent them to residents [83].

Uckermark, Germany, converted a reception facility into barrier-free and sustainable accommodation. It can be used as a student dormitory or home for the elderly when no longer needed to accommodate temporary protection beneficiaries or refugees [84].

In Slovakia, emergency accommodation became long-term in many cases because both cities lacked funding for long-term accommodation [85]. This was a particular problem in isolated locations without schools and healthcare services [86]. As Nitra attracts workers to its factories, employment agencies try to contract accommodation capacity in dormitories, leaving none for temporary protection beneficiaries [87].

In Berlin, Germany, the Berlin Senate approved the building of modular housing apartments reserved for refugees in 2016 and 2018. As of January 2023, 29 of the 50 buildings had been completed. Stuttgart also started to build modular buildings that can be moved to various locations in the district, and to rent boarding houses and vacant properties for the long term, converting them into self-catering accommodations [88]. Limited availability of brownfield sites was a particular challenge for the authorities in both cities.

Ireland also planned to increase the number of modular and rapid-build homes and allocate a € 30 million fund to support local authorities in refurbishment projects. These solutions would be a longer-term form of accommodation. The Department of Children, Equality, Disability, Integration and Youth would lease refurbished accommodation for a minimum of five years, and a range of rapid-build accommodation would last between 20 and 60 years.

Promising practice: transferred rental agreements (Brussels Region)

The Brussels regional authorities support the use of transferable rental agreements. A local organisation, municipality or social services department (PCSW) acts as tenant and signs a rental agreement with the landlord, subletting the accommodation to the temporary protection beneficiary.

The beneficiary has predefined goals, usually linked to the ability to independently maintain the accommodation and manage, execute and respect the rental agreement. If the beneficiary reaches them, the tenant can decide to transfer the agreement to the beneficiary, who becomes sole tenant, without the need of further consent from the landlord.

This type of contract guarantees the payment of rent and social support. At the same time, it can provide a longer-term prospect for temporary protection beneficiaries.

Sources: Brussels regional government and Caritas, February 2023

Promising practice: cooperation with companies (Warsaw)

The city of Warsaw and the company Siemens agreed to allocate part of the company's office space at its Warsaw headquarters as a long-term residence centre. It offers space to 160 displaced people fleeing Ukraine. The company adapted the existing rooms into apartments. Warsaw City Council is the operator of the facility.

Source: Siemens, *Poland*

1.2.6 Funding

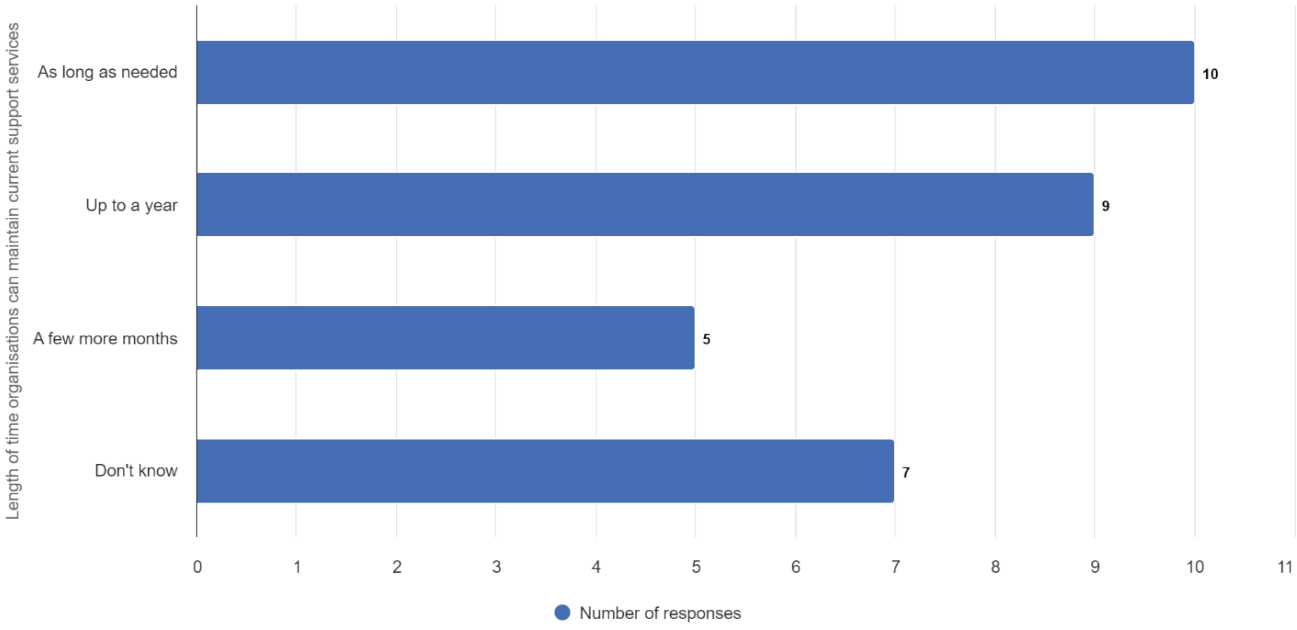
Local authorities received various types of funding for housing solutions, including from EU sources described in the introduction. To tackle local emergency housing needs specifically, the European Commission mobilised the European Regional Development Fund to support social housing, including purchases and refurbishment, and the European Social Fund Plus, to support community-based services and accommodation, especially for people with special needs.

FRA consultation findings on funding constraints

About half of the 30 local support organisations FRA consulted reported problems in funding the support they provide to temporary protection beneficiaries. Most of them referred to insufficient amounts, administrative burden and delays. Further comments referred to the insecurity of funding resulting from yearly financing, the complexity of procedures to apply for EU funding and the length of time it took, and unsustainable overreliance on volunteers. Only 10 of 30 organisations were confident that they could continue supporting temporary protection beneficiaries based on current resources (see Figure 2).

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

Figure 2 – Local organisations' ability to continue supporting temporary protection beneficiaries



Alternative text: A bar chart showing how many organisations gave each answer. Ten said 'as long as needed', nine said 'up to a year', five said 'a few more months' and seven said 'don't know'.

Question: "Based on current financial and human resources, how much longer will it be possible to maintain current support services for temporary protection beneficiaries?"

Source: online consultation with 30 support organisations in 17 locations, 2023

Allocation of funding to housing solutions was typically based on the number of temporary protection beneficiaries accommodated. However, that resulted in mismatches because of the dynamic situation, lack of accurate data (see Section 1.2.1), frequent relocations and reliance on private accommodation providers in many locations.

In Bruges, Belgium, for example, local authorities get two types of financing: one based on the number of registered temporary protection beneficiaries and the other linked to the accommodation that the local authority has registered and validated in the Flemish housing tool [89]. The second type excludes private accommodation by host families registered and validated in the Flemish housing tool [90].

In Sweden, the assigned municipality receives compensation based on the number of people assigned to it that it accommodates and not for empty places that the Swedish Migration Agency has not yet filled [91]. This made it difficult for the city of Malmö to assess the need to adapt housing and made it difficult to secure long-term solutions [92].

2. Education

Education is a basic right set out in national constitutions and international and EU law, including the TPD (see 'Legal corner'). This report focuses on compulsory primary and secondary education.

Legal corner

EU Member States must grant children enjoying temporary protection access to the education system under the same conditions as their own nationals, according to Article 14 of the TPD. Member States may confine this access to the state education system. They may also allow adult temporary protection beneficiaries to access the general education system.

Article 14 of the Charter guarantees the right to education for everyone, including the possibilities of receiving free compulsory education and having access to vocational and continuing training. Article 17 of the European Social Charter (Revised) requires parties to provide free primary and secondary education and encourage regular attendance at schools. The Convention on the Rights of the Child (Article 28) recognises education as a legal right of all children, based on equality with nationals of the country where they live, and obliges the state to take measures regarding school attendance. It guarantees free compulsory primary education, free secondary education and access to higher education based on capacity.

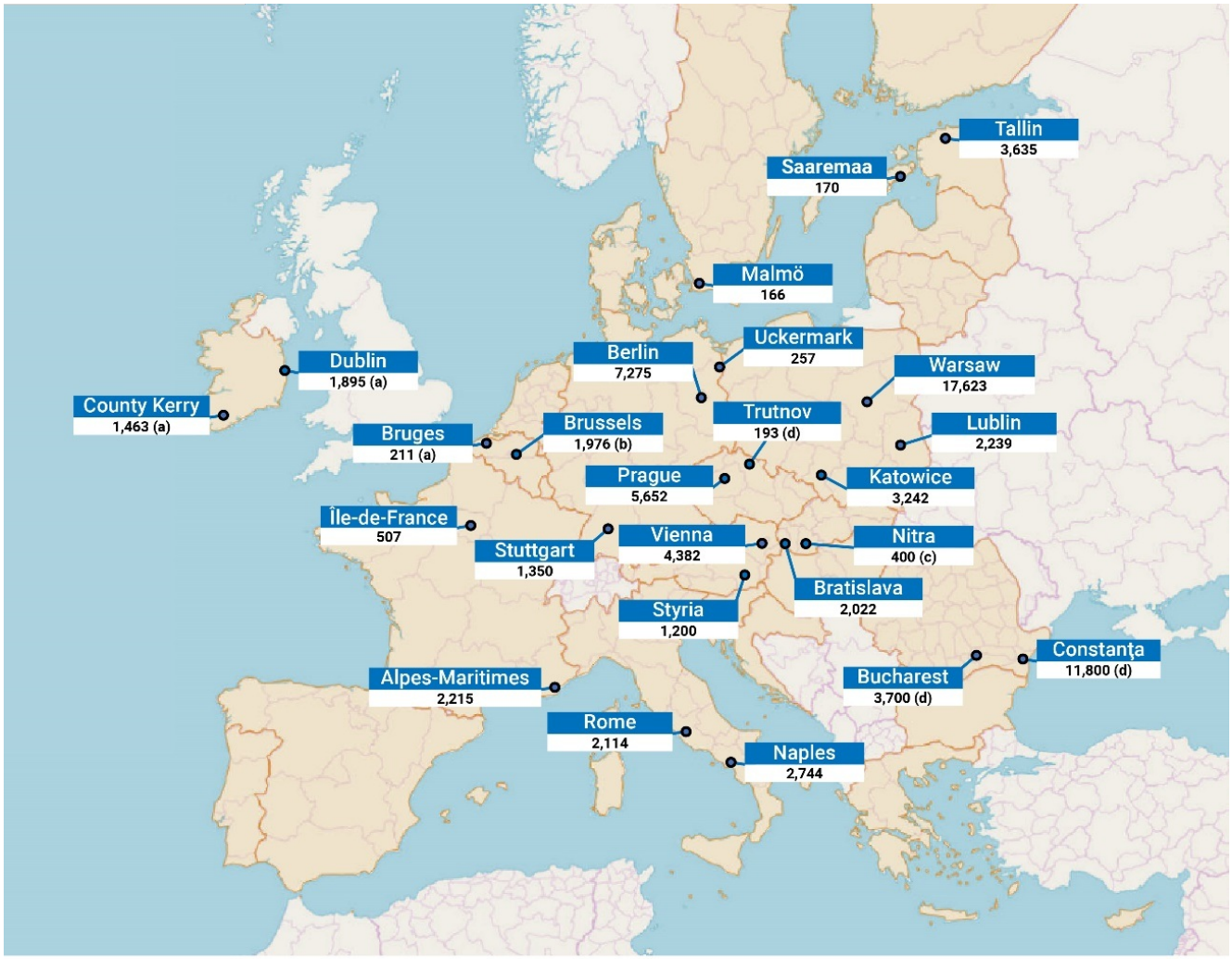
Integrating displaced children from Ukraine required specific efforts that reconcile school attendance with due consideration for children's need to keep in touch with their home language and culture. The European Commission outlined key principles and practices for the inclusion of displaced children in national education systems. They include providing school places, regardless of how long they intend to stay, preparing schools and teachers, and measures for early childhood.

Education policy is the responsibility of Member States. In federally organised states, regional or provincial authorities share responsibility for legislating on education with the central authorities. Examples are Austria (provinces) and Belgium (Flemish, French and German-speaking communities). Local authorities are otherwise typically responsible for implementation. They have some leeway to develop educational integration strategies, coordinate the operation of schools, including admission and enrolment, and develop measures ensuring the suitability of education.

However, the scope of responsibilities varies depending on the administrative organisation of the Member State. Multiple and locally differing approaches to integrating third-country national children are thus also possible in Member States with centralised school systems.

Arrivals from Ukraine significantly increased the number of school children, particularly in capital cities, as Figure 3 shows. Not all locations however, were able to provide figures or concrete data, because of the administrative burden. The large-scale arrivals of children prevented a coordinated information flow among national, regional and local administrations and schools, in some countries.

Figure 3 – Map of selected locations and number of displaced children from Ukraine enrolled in schools (kindergarten, primary and secondary) by January 2023



(a) Numbers refer to children enrolled in primary and secondary education.
(b) Number includes seven children enrolled in special schools.
(c) Number refers to children enrolled in primary education only.
(d) Number refers to children located in the city.

Source: FRA, January 2023

Alternative text: A map showing the number of displaced children from Ukraine enrolled in schools at locations covered in this report. The largest number is in Warsaw, Poland with 17,623 children enrolled. The smallest number is in Malmö, Sweden with 166 children enrolled. Data for Bruges (211) represents children enrolled in primary and secondary education. Data for Brussels (1,976) includes seven children enrolled in special schools. Data for Nitra (400) refers to children enrolled in primary education only. Data from Trutnov (193) refers to children located in the city.

2.1 Measures facilitating access to education

Member States granted displaced children full access to their educational systems and became stricter about school attendance with effect from the beginning of the 2022/2023 school year. Local authorities tried to support the integration of displaced children into their national education systems directly or through preparatory classes. The following are examples of local measures facilitating access to education.

2.1.1 Raising awareness of school registration

FRA survey finding on continuity of education

Fewer than half of respondents who were in education shortly before leaving Ukraine have continued their education in the host country, according to FRA's Fleeing Ukraine survey.

Source: FRA, Fleeing Ukraine, February 2023

Many displaced parents did not know that their children have the right and obligation to attend school in the Member State. Local authorities therefore reached out to displaced families via various channels to ensure that all children can benefit from the advantages of on-site schooling.

Ireland has adopted a proactive approach to raising awareness of the right to education for displaced children at school age. Regional education and language teams (REALTs) were established to support the needs of Ukrainian children arriving in Ireland. In December, Schools of Sanctuary held a workshop for displaced parents about the Irish education system. It presented the results of a survey of displaced parents from Ukraine.

Other municipalities raised awareness through dedicated websites and by mobilising support from social partners and NGOs. The city of Vienna maintains a dedicated website providing educational information to parents and guardians of displaced children. The city of Graz in Styria launched a welcome desk referring displaced parents to Welcome Schools (Willkommensschulen) at an early stage of the displacement in February 2022.

Similarly, in Italy, the Rome Municipality has dedicated a specific FAQ section to education for temporary protection beneficiaries. It has also provided a summary guide to the Italian educational system. On the official Naples Municipality website, the 'Yalla!' project delivers guidance and assistance services for the Ukrainian emergency. It has focuses especially on integrating children and adolescents into schools, and on language services.

The Ministry of Education allocated resources to support schools receiving children displaced from Ukraine. They share some of those resources with local authorities and in networks.

The city of Gothenburg, Sweden, featured a plan to direct people towards an open preschool facility, which told families about schools and how to apply.

Different approaches have been also reported at the level of districts in some capital cities that did not have a central comprehensive system for mapping capacities and placement options.

The Centre for Educational Analysis in Bratislava, Slovakia, has mapped the situation in 10 schools. One district in Bratislava had already appointed a coordinator for registered temporary protection families and successfully provided specific guidance on placing children in schools [93]. Another district (Staré mesto), with 7 primary schools and 16 kindergartens, had

received the largest number of pupils displaced from Ukraine. It did not establish a specific coordination system for the placement of children, but the principals of individual schools established an effective communication system, which provides information on existing capacity and vacant places [94].

2.1.2 Preparatory classes

When a significant number of displaced children were in the same municipality, schools organised dedicated preparatory classes. These classes mainly supported language acquisition and provided knowledge about the host country, with gradual integration into mainstream classes. They ran either before or in parallel to regular class attendance.

In Prague, Czechia, the municipality organised 'zero year' preparatory classes in selected secondary schools before displaced children attended mainstream classes. Their goal was to help children learn Czech, adapt to the new school system and enter Czech secondary schools.

Tallinn is the only local government in Estonia to have launched two schools designed especially for displaced children from Ukraine with a language immersion programme. That means the language of instruction is Estonian, but up to 40 % of the curriculum can be taught in the students' mother tongue.Räägu 49, an offshoot of Lilleküla Gymnasium, is for Ukrainian children in years 1–6. Vabaduse School is for students in years 7–12.

Conversely, in Warsaw, Poland, a Ukrainian school called SzkoUA was established in April 2022, to provide displaced children with the opportunity to study in Ukrainian and following Ukrainian curricula.

Displaced children in primary schools in Bruges and Brussels, Belgium, can choose to follow preparation classes or register with regular classes with extra support. The Wallonia-Brussels Federation offers newly arrived children 12–18 months of preparation in French, addressing both primary and secondary education needs. Similarly, in Bruges, refugee children may attend one year of preparation classes for non-Dutch-speaking newcomers while attending certain classes or activities with children in regular classes. This mitigates the risks of segregation.

In Warsaw [95] and Lublin [96], Poland, schools can open preparatory units for pupils coming from abroad who do not know Polish or whose knowledge of it is insufficient for learning (see survey findings box), on the basis of the Act of 14 December 2016 (Education Law).The Law on assistance to Ukrainian citizens also mentions the possibility of establishing preparatory units at schools. Such units teach Polish at least six hours a week.

The United Nations Childrens Fund (UNICEF) as well as NGOs also supported language acquisition processes at schools in Bratislava, Slovakia [97], Naples, Italy [98], and Prague, Czechia [99].

FRA survey findings on obstacles to continuing education

Language issues were the main reason for not attending education offered by the host country, according to FRA's Fleeing Ukraine survey. Nearly four in ten respondents who needed to learn the host country's language to continue their education had not attended a language course since arriving.

Source: FRA, Fleeing Ukraine*, February 2023*

2.1.3 Recognition of Ukrainian curricula and certificates

If students are to have continuity of education, and their achievements and qualifications are to be recognised if they return to Ukraine, it is essential to recognise Ukrainian curricula (see consultation findings box). Some EU Member States have recognition arrangements with the Ukrainian Ministry of Education to provide partial online education for displaced children studying abroad.

The Ministry of Education of the Wallonia-Brussels Federation in Belgium, for example, published an instruction clarifying the application of general regulations to temporary protection beneficiaries. According to this guidance, equivalent certificates from the Ukrainian education system are not needed for accessing primary or secondary education. Subject to availability of places, parents can enrol their children in the school of their choice. Children can enrol during the school year.

The federation's education website provides a summary table comparing the structure of education in Ukraine and in the Wallonia-Brussels Federation. It also gives an overview of the most important information for temporary protection beneficiaries. It is available in French, Ukrainian and Russian [100].

FRA consultation findings on efforts towards compatibility of education

Some locations implemented specific initiatives to ensure that the education they offer is compatible with education in Ukraine. These included allowing parallel attendance of online courses by Ukrainian institutions, (Bruges, Brussels, Bucharest, Constanța, Gothenburg, Lublin, Vienna); enabling pupils to take Ukrainian school exams (Bruges, Gothenburg, Lublin, Tallinn, Vienna); and coordinating curricula to allow compatibility (Bruges). A respondent from Brussels, Belgium, referred to a specific organisation supporting displaced children in Belgian schools on a case-by-case basis. It also has a crisis centre with people who speak Ukrainian, who can interpret and provide advice on different issues.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

2.1.4 Recruiting educational staff from Ukraine

Several locations made use of teachers and other education personnel among the displaced people, in line with the recommendation of the European Commission. Some Member States hired Ukrainian-speaking support teachers to facilitate the transition into mainstream classes and allow children to maintain their bond with the Ukrainian language and culture.

In the province of Styria, Austria, for example, 19 of 52 newly hired teachers in 'welcome schools' are temporary protection beneficiaries from Ukraine. The city of Vienna granted fast-track work permits for teachers displaced from Ukraine to teach in bilingual so-called "Ukrainian classes" taught in German and Ukrainian. [101]

In Czechia, the Ministry of Education provides financial support to schools hiring Ukrainian teaching assistants. This facilitated the recruitment of 188 teaching staff from Ukraine in Prague by September 2022, including 100 teachers. The majority are temporary protection status holders. It is estimated that there are up to 10,000 teachers among displaced people.

The ministry allocated CZK 218 million (€ 9.3 million) for January–August 2023 across the whole country. A total of 552 schools from all regions can apply. The largest amount goes to Prague and Central Bohemia.

It takes time for Estonia to recognise Ukrainian qualifications. In Tallin, educational institutions can employ teachers from Ukraine on fixed-term contracts until then [102] .In Saaremaa, since autumn 2022, the local government has hired displaced teachers and psychologists to overcome the language barriers of students from Ukraine.

Similarly, in Berlin, Germany, 124 teachers from Ukraine were employed until November 2022 based on a simplified procedure [103] . The Ministry of Education, Youth and Sports of Brandenburg reported that temporary contracts as teachers and pedagogical staff can be granted to temporary protection beneficiaries with B2 level knowledge of German, and those with a proven

C1 level knowledge can have permanent contracts. So far, as of July 2023, 237 teachers and pedagogical staff from Ukraine have been employed in Brandenburg under these conditions.

In Ireland, the education and training boards maintain a pool of tutors in English for Speakers of other Languages. In Kerry, the local education authority encourages temporary protection beneficiaries who speak English and are teachers to have their qualifications recognised by the Teaching Council. A tailored process has been established to support the registration and vetting of qualified Ukrainian teachers.

In Poland, the city of Lublin and the Polish Centre for International Aid signed a cooperation agreement. It developed the new position of 'teacher assistant' and allowed several schools in Lublin to employ about 75 teacher assistants from Ukraine in line with a 'cash for work' programme. This allows Ukrainian-speaking support teachers who do not yet have sufficient skills in Polish or whose Ukrainian diplomas are not yet certified in Poland to teach at Polish schools. Some 400 Ukrainian teacher assistants were employed in Warsaw [104].

2.1.5 Social support to displaced children and families

Social support and well-being are essential to include children successfully in the school community and society as a whole. They are closely linked to protecting child rights, which is anchored in EU law and policy [105]. In educational institutions, such support may include a financial subsidy, provision of free school materials or free school meals. Partnerships with NGOs or companies initially helped to support the integration of newly arrived children from Ukraine in local schools.

The city of Prague, Czechia, for example, provides school kits, including tickets to the Botanical Garden and the Planetarium. It extended that to displaced school children as well. In Trutnov, schools support round-table discussions for students with temporary protection to exchange information.

In Estonia, all students aged between 7 and 19 years with temporary protection are entitled to a one-off allowance (€ 50 per child) upon admission to school. The NGO Estonian Refugee Council administers it. It is intended for expenses related to starting school. In addition, monthly support of € 465 per student has been awarded to private schools that accepted temporary protection beneficiaries [106].

Local authorities in Warsaw, Lublin and Katowice, Poland, provided support for displaced children from Ukraine. It included free school meals, allowances and school equipment. Funding came from UNICEF, the Polish International Aid Centre and other organisations.

The company Jaguar Land Rover has operated in Nitra, Slovakia, for a long time. It provided a grant of € 92,000 for tablets, translators and laptops to schools hosting children from Ukraine [107]. Similarly, in Ireland, Microsoft Dream Space held science, technology, engineering and mathematics workshops for 60 children from Ukraine with support from the Irish Red Cross.

Promising practice: social support for school integration (Bruges)

In primary and secondary schools, 'bridge figures' from the city council work to build connections between the school, parents and the neighbourhood. They focus on child poverty and equal opportunity. These people played an important role in supporting displaced children and their parents. The 'bridge figures' were established in 2020 and have increased their team since then.

Source: Guide in Diversity in Bruges, consulted in February 2023; City of Bruges, 'Brugfiguren onderwijs'

FRA and the EUAA created a practical tool to help guardians support displaced children from Ukraine in registering for temporary protection and exercising their rights. The tool was published in 2022 and contains tips, a description of workflows related to temporary protection and additional resources.

2.2 Challenges to ensuring access to education

Local education systems tried to take into account the uncertainty of stay, which was a significant challenge. For example, in Estonia, the Ministry of Education and Research planned to provide children and young people from Ukraine with customised short-term and long-term options to continue their education.

Recognition of Ukrainian online schooling differed among Member States. The high numbers of arriving school children resulted in a variety of challenges for local authorities and schools, as the examples in the consultation findings box illustrate.

FRA consultation findings on challenges concerning education

Issues related to education and language acquisition were among the top challenges in supporting temporary protection beneficiaries, responding organisations from Brussels, Bucharest, Lublin, Tallinn and Vienna considered. They referred to differences from Ukrainian curricula and the impossibility of attending Ukrainian classes (Brussels, Bucharest, Tallinn); bullying and difficulties concerning language acquisition (Gothenburg); and incompatibility between educational systems (Lublin).

A support organisation in Vienna, Austria, referred to the possibility of acquiring Ukrainian school-leaving qualifications online that are recognised in Austria. However, many young people see themselves as bearing the double burden of attending both Ukrainian and Austrian schools to avoid gaps in their curricula and gain access to further educational opportunities in both countries.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

2.2.1 Obstacles to school registration

A lack of reliable local data, administrative barriers and frequent changes in accommodation made school registration difficult in some locations. Challenges emerged because displaced children did not always register in the national education system.

In Italy, the Ministry of Education invited educational institutions to report the numbers of displaced Ukrainian school-age children accepted on a weekly basis, starting from 22 September 2022. However, participation by educational institutions was limited, the General Directorate for Information Systems and Statistics reported. In many cases they failed to register or validate the data appropriately because the numbers of arrivals and registrations were massive and fluctuating.

In Sweden, reliable data are lacking regarding the number of displaced children who have received residence status under the TPD and are registered at various school levels, both Malmö and Gothenburg authorities reported. That is partly because information about nationality is not requested at the time of application [108].

Furthermore, people displaced from Ukraine have been moving from one place to another. That made it difficult to identify the exact numbers of children needing a school place in a certain location, and monitor children dropping out of school. In Czechia, data collection is difficult because of the high number of displaced people arriving, because of families and children returning to Ukraine, and because of their movement within Prague and throughout Czechia [109]. In Dublin, Ireland, and across the country, families were advised to wait for a week or two after registering for temporary protection, and then reaching their final accommodation, before enrolling their children in schools, to avoid disruptions or duplication of schools' enrolment

process [110].

Promising practice: collecting data on numbers of local school children (Poland)

In Poland, citizens of Ukraine CAN apply for a Universal Electronic System for Registration of the Population (*Powszechny Elektroniczny System Ewidencji Ludności*, PESEL) number. It identifies an individual and allows Ukrainians to receive social benefits, use state medical services, work officially and study. The PESEL system is also designed to provide data on how many children of school age are registered in each city. A separate category, PESEL UKR, has been created for displaced Ukrainians with temporary protection status.

*Source: Poland, Special Act on Assistance to Ukrainian Citizens (*Ustawa o pomocy obywatelom Ukrainy w związku z konfliktem zbrojnym na terytorium tego państwa*), 12 March 2022*

Administrative and regulatory barriers also made enrolment difficult. In Austria, compulsory schooling age ends at 15 years old. In Graz, admission above that age depends on the decision of the school [111]. Because capacity is limited, children above that age often cannot continue their education.

Challenges can also emerge when displaced children are not registered in the national education system. Slovakia, for example, does not require children enjoying temporary protection to attend school [112]. The initial school placement system was not coordinated and schools did not receive further guidance from the Ministry of Education other than to enrol children in schools based on their capacity [113].

A major challenge is identifying children who are at risk of dropping out of school and are not enrolled in the educational system.

The authorities have asked for support from all relevant actors, including those in direct contact with the refugee community, as reported in Bucharest and Constanța, Romania. In August 2022, the UN reportedly identified disparities between the official local guidelines on school capacity and the actual situation in both cities. This situation required launching an accurate reporting system and simplifying the school enrolment procedure. UNICEF also urged competent authorities to identify and reduce administrative and regulatory barriers that block children's access to formal education in all education cycles.

Displaced students have dropped out of school for gainful work in Warsaw, Poland [114]. There, young people may be employed from the age of 16, provided they have finished primary school (eight years).

Moreover, there is no central system for monitoring school attendance in either the Polish or the Ukrainian system. Warsaw's local authorities do not have the power to check if a refugee child is

enrolled in or dropping out from either a Polish or a Ukrainian school. Enrolment data for Roma children from Ukraine in Polish schools are missing, Lublin and Katowice education department representatives reported. [115] By January 2023, the majority of Roma children from Ukraine lived at the large reception centre on the premises of the Warsaw Expo centre, where they could only follow limited educational activities [116].

2.2.2 Lack of school places

Where the number of displaced children is particularly high, local authorities struggled to reinforce basic infrastructure and to hire and train teachers and other educational staff.

FRA survey finding on availability of school places

One in five survey respondents aged 12–15 noted not being accepted by a school as the main reason for not attending school.

Source: FRA, Fleeing Ukraine, February 2023

Many local schools had reached full capacity. In Berlin and Stuttgart, Germany, school authorities faced challenges to distribute school children within the cities and provide daycare and school places in districts with a high number of collective accommodation facilities. Where a school reaches capacity, displaced children, including young children, have to travel to another part of the city. In Poland, the Warsaw municipal education office reported challenges responding to the schooling needs of Roma children from Ukraine, who often live far away from local schools [117].

Promising practice: mapping vacant teaching spaces (Malmö, Gothenburg)

The Department for Compulsory Education of the city of Malmö assigned more staff to mapping the vacant premises that could be used as teaching spaces for newly arrived students. Similarly, the city of Gothenburg formed a working group within its Department for Compulsory Education to receive and assign displaced school pupils while increasing its resources. It allocated additional resources to the reception unit for newly arrived students, to introduce and map students from Ukraine.

Source: Sweden, Department for Compulsory Education, Malmö, and Department for Compulsory Education, Gothenburg, both consulted in November 2022.

Insufficient capacity often resulted in overcrowding. Almost all public schools had to reconsider their rules about class capacity. Local authorities and schools tried to overhaul legal provisions on, for example, the number of square metres per child per classroom.

In Bruges, Belgium, two secondary schools offering preparatory classes for displaced children reached full capacity [118]. In Saaremaa, Estonia, the mayor underlined in October 2022 that the city could no longer cope with new arrivals, as the schools, kindergartens and welfare system in the municipality had reached their limits.

In Ireland, the Dublin City Community Cooperative raised an early alarm that capacity was lacking, especially in Dublin North Inner City. People raised similar concerns about West Kerry schools. The Department of Education is working with the REALT to make the necessary arrangements.

In Czechia, PAQ Research demonstrated that insufficient capacity was a key impediment to school attendance. In pre-schooling, 15 %–20 % of displaced children had not obtained a place; in primary education, 3 %–5 %; in secondary education, about 10 %. The study also revealed a clear correlation between school attendance and the parents' employment status and housing conditions. Children who live in stable accommodation are more likely to attend school than children who live in temporary accommodation.

Promising practice: coordinating school placements (Nitra)

COMIN is the contact point for all foreigners arriving and living in Nitra, Slovakia. The COMIN centre provides them with assistance services and legal aid. The local educational department has established effective cooperation with it to efficiently coordinate the placement of children in schools depending on their registered accommodations.

Because schools do not have enough capacity, COMIN, UNICEF and Nitra municipality are exploring alternatives with schools in neighbouring municipalities. The project is considering the use of school buses. An agreement among the regional education authorities is pending.

Sources: Information provided by COMIN centre, Nitra, 18 January 2023; Komenského inštitút, 'Prvý reprezentatívny prieskum o začleňovaní ukrajinských detí do škôl: S čím sa boria učitelia?', 21 June 2022

2.2.3 Additional and parallel classes

Transition from preparatory or parallel online classes to regular classes in the national education systems was challenging. Sometimes it risked segregation.

Monolingual preparatory classes with homogeneous composition may raise pedagogical challenges regarding language acquisition. Segregation risks may arise in some cases, education authorities in Tallinn, Estonia, and in Berlin and Stuttgart, Germany, recognised [119]. Such risks also occurred where there were shortages of classrooms in school buildings and teachers.

For example, in Prague, Czechia, the municipality observed a risk of segregation and a related

decline in the quality of education as many children from Ukraine enrolled in schools with free capacity, which were often unattractive to local residents. Teaching many children with language barriers further affected the quality of education, and children from Czechia dropped out more often [120].

When displaced children had to learn the local language before attending regular classes, they often had to repeat years and were older than their classmates [121].

Promising practice: integrating preparatory classes into regular school schedules (France)

France provides regular classes with intensive teaching of French. They are for all grades.

Children displaced from Ukraine often show a higher level of knowledge in certain subjects, especially exact sciences such as mathematics, than their French peers. In such cases, the pupils develop strengths in the local school curriculum and recognition among their peers. That boosts their self-esteem and motivates them to learn.

Sources: France, Mon coeur ukrainien, Île-de-France, January 2023; Ministry of Education, 'Scolarisation des enfants allophones nouvellement arrivés'

Parallel online schooling according to Ukrainian curricula (see survey finding box) created various challenges for the children concerned as well as for school administrations. A FRA bulletin gives an overview of measures supporting the integration of children in formal educational systems.

For example, in Germany, compulsory schooling is the general rule. It also applies to displaced children. If they wish to attend online Ukrainian classes too, parents must ensure that this does not affect regular school hours.

In France, the Ministry of Education requires written proof that displaced children below the age of 16 are enrolled in the French education system. Otherwise they can be fined [122].

FRA survey finding on attendance of Ukrainian online schooling

Almost two thirds of children responding to the FRA survey attended online education with a school/university in Ukraine or taught themselves using materials with support from Ukraine.

Source: FRA, Fleeing Ukraine, *February 2023*

Additional schooling during a child's free time creates stress and overlaps. In Romania, online classes with the Ukrainian national education system were mainly in the mornings and thus

overlapped with the Romanian classes. According to data collected in October 2022, most (85 %) secondary school-aged children (12–17) would prefer to take part in online learning; only 52 % of primary school-aged children (6–11) displaced from Ukraine and 1 % of children under the age of 5 intended to attend distance learning in the school year 2022-2023.

Pupils following distance learning from Ukraine while studying Swedish found it stressful to study both at the same time [123]. Most displaced students received weekly assignments from their school in Ukraine. They completed them in the evenings and at weekends, so that they could physically attend Swedish schools.

Promising practices: granting special rights to displaced secondary school children (Alpes-Maritimes)

A general agreement allowed displaced children to finish Ukrainian high school online to get their diplomas without interrupting their learning. This applied to displaced children at secondary graduation level who joined the French academic year 2021/2022.

Source: French Association of Ukrainians of the Côte d'Azur, Alpes-Maritimes, 18 January 2023

2.2.4 Psychological support to traumatised children fleeing the war

Language barriers, overloaded teaching and psychological support staff, and the need for extra resources to train school staff were key obstacles to providing adequate psychological support to displaced children in school (see consultation finding box and Section 4.2.5).

FRA consultation findings on special educational needs

Eight education support organisations responded to FRA's question. Six of them considered that at least some or most displaced school children have special educational needs linked to psychological stress or war-induced trauma.

In Lublin, Dublin, Bucharest and Gothenburg, all, most or many of the displaced children coming from Ukraine are traumatised, respondents underlined. In Brussels, Bruges, Bucharest and Vienna, only a few or some of the children are traumatised, respondents estimated. In Gothenburg, 67 % of displaced children have trouble adapting to school and society, 34 % show symptoms of stress and trauma, and eight pupils have tried to commit suicide, according to a survey by a responding organisation.

Although respondents from Bruges and Tallinn mentioned that special educational needs are adequately addressed in their areas, most respondents believe that special educational needs are not or only partly addressed. They mentioned language (Dublin) and already overstretched educational services (Brussels and Dublin) as the main barriers to adequately addressing special educational needs. They also pointed out a need for more psychological support and adequate means for teaching staff to support traumatised children (Vienna), and a lack of financial resources for organising care activities and hiring additional specialists (Lublin).

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

In Stuttgart, Germany, war-induced psychological stress poses challenges for teachers and displaced children at school, the education authority noted.

A representative of Educate Together in Ireland called on all schools in Ireland to give access to the National Education Psychological Service [124]. Pieta is a good resource for counselling support, according to the informant.

A quarter of primary school teachers in Bratislava, Slovakia, have observed psychological discomfort when teaching displaced children from Ukraine, whereas at national level a fifth of teachers have, according to a survey conducted in August 2022. In Nitra, almost every school has a psychologist, but they usually do not speak Ukrainian, so their support for the children is limited. There is currently only one psychologist in the city from Ukraine who visits schools and works with children [125].

The need for more qualified staff to deal with traumatised children was also noted in Austria [126] and Poland [127] (see promising practice box).

Promising practice: working with Ukrainian- or Russian-speaking psychologists (Warsaw, Katowice, Lublin)

The education departments of Warsaw, Katowice and Lublin, Poland, contacted the local psychological-pedagogical public counselling centres to seek Ukrainian- or Russian-speaking psychologists. They included people with temporary protection status. Mobile psychological help teams have been considered an effective practice.

Source: Education Office of Warsaw City Council, 5 January 2023; Healthcare department of Lublin local authorities, 5 January 2023; Education department of Katowice municipal authority, January 2023.

2.2.5 Support for children with disabilities and special needs

Displaced children may have special needs related to their disabilities. Ensuring their access to education has been a challenge in many locations. International standards require children with disabilities to access and participate in education on the same basis as all other students, in mainstream schools. Children living in residential care should have access to community-based schools outside the care facility whenever possible.

In schools in Vienna, Austria, specially qualified teachers receive displaced school children with disabilities or chronic diseases. They assess and allocate them to suitable school places, in the same way as Austrian children, in a special education class or an integration class [128].

Tallin, Estonia, uses care centres for all children with special needs, including children under temporary protection [129]. Saaremaa has deployed support staff to families whenever needed [130].

Support for special education needs in schools is a major challenge, the Education and Training Board in Kerry, Ireland, reported. Both Dublin and Kerry REALT teams cooperate with the National Council for Special Education Needs to adequately address special educational needs of displaced children. Additional resources for special education needs have been provided to schools where a large number of Ukrainian pupils with special educational needs have enrolled.

In Warsaw, Poland, educating children with special needs is challenging [131]. The number of places at special education or integration schools is limited. Certification systems differ between Poland and Ukraine, which complicates the translation of relevant documents [132].

Promising practice: integrating children with special needs (Trutnov)

In Trutnov, Czechia, children with special needs are referred to a local centre that specialises in children with disabilities or special educational and psychosocial needs. Volunteers or the employees of the community centre provided interpretation. The local club for people with disabilities offered educational, after-school and extracurricular activities for displaced children from Ukraine. Temporary protection beneficiaries in return volunteered to assist local people with wheelchairs.

Source: Czechia, municipal officer from Trutnov who coordinated most municipally led initiatives concerning displaced people from Ukraine, 17 February 2023

3. Employment

All Member States covered have incorporated Article 12 of the TPD into national law (see 'Legal corner'). They granted temporary protection beneficiaries access to employment, self-employment and vocational training, except Slovakia. It has not granted access to self-employment (see Annex 4).

National legislation on remuneration, access to social security systems relating to employed or self-employed activities, and other conditions of employment applies to beneficiaries of temporary protection in the same way as to nationals.

Legal corner

According to Article 12 of the TPD, beneficiaries of temporary protection are granted access to employment, self-employment, vocational training and practical workplace experience for the duration of their residence permits. Member States may give priority to EU and European Economic Area citizens over legally resident third-country nationals who receive unemployment benefit.

A European Commission recommendation sets out measures facilitating the recognition of academic and professional qualifications of temporary protection beneficiaries, especially in professions facing greater demand due to the arrival of people seeking protection.

The Charter grants everyone the right to engage in work. It explicitly says that third-country nationals authorised to work are entitled to working conditions equivalent to those of EU citizens (Article 15). Social policy measures to protect the rights of workers envisaged in Article 153 of the Treaty on the Functioning of the EU are not expressly restricted to nationals or lawfully staying third-country nationals.

All Member States covered in the report have accepted the European Social Charter (Revised). In Article 1, parties agree to take measures supporting the effective exercise of the right to work.

3.1 Rate of employment

Only a small proportion of temporary protection beneficiaries are employed in the Member States covered. Employment increased in the reporting period.

For example, at the end of January 2023, in Czechia, 21 % of temporary protection beneficiaries (94,383 out of a total of 440,863) were in paid employment and almost 4 % (16,310) were registered as jobseekers. Three quarters of temporary protection beneficiaries from Ukraine who obtained work in Czechia from the outbreak of the conflict until the end of January 2023 were

women. Of 4,870 temporary protection beneficiaries surveyed at the end of 2022, half (51 %) of those who had been working in Ukraine had a job in Czechia at the end of 2022. A quarter of those jobs were part-time. Of those employed, 15 % held long-distance jobs in Ukraine and worked online.

In Poland, out of 5,000 people displaced from Ukraine who approached the Warsaw labour office, about 3,900 registered there and 1,800 were employed as of 1 January 2023 [133].

In Estonia, as of 27 November 2022, 10,405 temporary protection beneficiaries out of a total of 14,647 temporary protection holders who had registered their residence in Tallin were employed, and 3,151 were registered as unemployed. Some 78.2 % of the unemployed temporary protection beneficiaries are women and 21.8 % are men [134]. As of 30 June 2023, 4627 temporary protection beneficiaries were registered as unemployed in Tallinn.

FRA consultation findings on temporariness of protection status

Twelve local organisations in this study support temporary protection beneficiaries in accessing employment. The temporary character of temporary protection reduces the possibility of finding employment, according to organisations in Styria and Vienna (Austria), Prague (Czechia), Stuttgart (Germany), and Gothenburg and Stockholm (Sweden). It does not affect the possibility of finding a job in Bruges and Brussels (Belgium), Dublin and its inner city (Ireland), and Bucharest (Romania), organisations there report.

In Stuttgart, an apprenticeship can take up to 4.5 years, with all the preparatory courses, schooling and internships. It is a significant investment, financially and personally, by an employer. Offering an apprenticeship to a young person when it is not guaranteed that this person will be allowed to stay for even two or three years was mentioned as an issue.

The same problem applies to other employment contracts in which employers seek long-term reliability and firm planning. In Prague, the temporary character of temporary protection results in a lack of long-term individual plans and strategies. Temporary protection beneficiaries do not particularly mind the quality of employment, since they see it as only a bridging job.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

In Slovakia, more than 15,000 temporary protection beneficiaries from Ukraine out of a total of 96,030 were employed as of 14 January 2023 [135]. Approximately a quarter were employed in Bratislava region. In Nitra and in Bratislava region, the number of employed temporary protection beneficiaries is on the rise.

In some Member States, temporary contracts were prevalent. In Austria, temporary work contracts help many people enter the regular labour market [136]. In contrast, in Slovakia, in November 2022 only approximately one fifth of the temporary protection beneficiaries were on

temporary contracts. The rest had regular labour contracts.

3.2 Sectors of employment

In EU labour markets, displaced people mainly work in unskilled and semi-skilled jobs. For example, in Vienna, Austria, 3,952 employment permits were issued to displaced people between March and December 2022. The top three sectors they covered were hospitality, cleaning of buildings and hairdressing/beauty. Most of the temporary protection beneficiaries employed in Czechia at the end of January had blue-collar jobs in construction and production line work.

In France, in the Paris area, displaced men are more likely to be hired in construction, and women as cleaners or private nannies [137]. In Nice, displaced persons are hired mainly in the restaurant sector [138].

In Poland, there is some mismatch between the occupations in great demand on the labour market (construction, transport and logistics, packing, meat industry) and the skills and qualifications of the temporary protection beneficiaries. Ninety per cent of them are women and are not prepared to work in these sectors [139]. Furthermore, women with younger children find it hard to take full-time jobs, even though childcare is available.

In Romania, according to the employment agencies representatives, most of the jobs that employers offer are for unskilled work in the assembling or garment industry, machine assembly, manual packing, kitchen work, waiting and handling goods. There is particular demand for housekeeping, childcare and cooking in Constanța, and education, childcare and nursing in Bucharest.

In Slovakia, in November 2022 the top sectors of employment for temporary protection beneficiaries were administrative services (26 %), industry production (25.8 %), wholesale and retail (7.7 %), and accommodation and catering services (7.2 %).

In Slovakia, in November 2022, 80.5 % of temporary protection beneficiaries had regular labour contracts, with the remaining having temporary job agreements.

People often mentioned overqualification as an issue. For example, in Belgium, national authorities are not always able to offer temporary protection beneficiaries jobs adapted to their qualifications, because they do not speak Dutch [140].

Similarly, in Austria, most temporary protection beneficiaries have a high level of education (either secondary school or academic degree) [141]. However, the demand for workers is predominantly in unskilled and semi-skilled jobs.

3.3 Measures facilitating access to the labour market

National authorities implemented various measures to support the employment of temporary

protection beneficiaries. They included information provision, professional counselling and advice, labour mediation, professional training and support to recognise qualifications. Local employment agencies provided most of these measures.

3.3.1 Providing information

Information on employment and training opportunities comes through online platforms and job portals. For example, in Ireland, the online JobsIreland recruitment service has developed a dedicated section to provide information in Ukrainian and Russian on employment supports and opportunities for those newly arrived from Ukraine. In Poland, each municipal authority in Warsaw, Katowice and Lublin has a dedicated web page on access to employment for people displaced from Ukraine. In Slovakia, the website of the COMIN centre, a contact point for all foreigners arriving and living in Nitra, and the website of the municipal office of Bratislava provides information on job offers and employment conditions in Nitra and Bratislava, respectively.

This information is sometimes translated into Russian or Ukrainian. For example, Austrian information booklets on the labour market were translated into Russian and Ukrainian. In Belgium, the information page 'Actiris for Ukraine' is also available in English and Ukrainian and provides general information for jobseekers.

Some Member States, for example Austria, Estonia, Poland, Romania and Slovakia, have government online job portals. In Romania, temporary protection beneficiaries seldom use them. They prefer other websites (such as ejobs.ro, bestjobs.ro, olx.ro, dopomoha.ro) or rely on Telegram, Facebook and Viber when searching for jobs, according to Internews and the Centre for Independent Journalism.

Many Member States have dedicated services at national or local level supporting temporary protection beneficiaries in searching for employment or training. Examples include AMS in Austria, Actiris (regional public employment office) in Brussels, Belgium, Eesti Töötukassa in Estonia and Assolavoro (the National Trade Association of Employment Agencies) in Italy.

In Brussels, Actiris has set up a specific desk to receive displaced people, with interpreters there. Actiris also recruited someone to inform people from Ukraine about available employment support measures in Brussels and to inform the authorities about the difficulties beneficiaries encounter [142] .In Ireland, the Department of Social Protection includes the public employment service. It has directly employed Ukrainian-speaking staff to help support jobseekers who have temporary protection [143] .

Employment fairs were mentioned as a way to connect employers and displaced people in Austria, Germany, Ireland, Poland and Romania. In Estonia, the Unemployment Insurance Fund organised recruitment days throughout Estonia for jobseekers who are beneficiaries of temporary protection and for organisations looking for employees. A total of 715 employers participated, and more than 18,000 jobseekers attended [144] .

Several localities organised information sessions or webinars on how to find work and/or establish oneself as self-employed. Informants in Styria, Austria, and Bruges, Belgium, mentioned that. In Germany, the Jobcenter and the Federal Employment Agency organised information events, job fairs and one-to-one counselling sessions focusing on general information on labour market integration for temporary protection beneficiaries with Russian/Ukrainian interpreters. In Berlin and Stuttgart, the local administration provided extra services, for example mobile and low-threshold job counselling, or mentoring programmes. Similar initiatives were also taken at the national level. For example, in Italy, Assolavoro, in collaboration with the United Nations High Commissioner for Refugees (UNHCR) and the World Employment Confederation, implemented the welcome&work project. That provides information on employment and free practical support services.

Many Member States' employment agencies have dedicated information or referral services for temporary protection beneficiaries. Examples are AMS in Austria, Actiris in Belgium, Eesti Töötukassa in Estonia and Assolavoro in Italy.

FRA consultation findings on risks of labour exploitation

In Brussels, Bruges, Bucharest, Gothenburg, Prague, Styria, Vienna and Warsaw, responding employment support organisations tackled potential labour exploitation risks by providing information on labour rights in Ukrainian to workers who were temporary protection beneficiaries. in Dublin, Stockholm and Stuttgart, responding support organisations did not provide information campaigns, but they did provide advice and support services for displaced people, including the aspects of labour exploitation that the other locations covered.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

Promising practice: local authorities employing Ukrainian staff (Katowice, Lublin and Warsaw)

Local authorities employ Ukrainian staff as interpreters at local labour offices and local authorities. Usually these are Ukrainian citizens, often graduates of Polish universities, who have lived and worked in Poland for a long time.

Source: Labour Office of Warsaw City Council, 4 January 2023; Strategy and Entrepreneurship Office of Lublin municipal authority, 13 January 2023; Katowice Labour Office, 26 January 2023

3.3.3 Support in finding employment

Public employment services usually also provide individual assistance in the search for employment. In some Member States, specific programmes facilitate access to work and provide incentives for local employers to hire temporary protection beneficiaries from Ukraine.

For example, in Belgium, the PCSW offers a specific type of employment agreement whereby the authority acts as employer and the employee works for an external organisation that pays a part of the wage, with the PCSW paying the rest. The employee is entitled to unemployment benefits if the job does not work out.

In Czechia, a new project of the Labour Office, with finance from the European Social Fund, will train Labour Office staff to better tailor their support to migrant clients, including temporary protection status holders. It includes providing interpretation services.

In Poland, the 'intervention work scheme' is a form of subsidised employment based on a contract between the employer and the labour office. It had already been introduced before the arrival of people displaced from Ukraine and is available to all jobseekers registered with the labour office. It has proved particularly useful for employing Ukrainian-speaking teacher assistants and intercultural assistants.

On this scheme, the local district employs the person for 6–12 months. After that, the employer must employ the person for three or six months.

Still in Poland, the Warsaw labour office developed a special form of contract between the labour office, employers and the public health authorities to help train displaced Ukrainians in the restaurant sector. It allows the labour office to cover the expenses of the training [145].

In Estonia, in-job training is subsidised. Estonian employers can apply for financial support for job-related mentoring for employees who have international or temporary protection, and they can get reimbursed for the costs of obtaining the employee's qualification, job-related translation services and job-related training.

Employment offices play a pivotal role in including temporary protection beneficiaries in the labour market. For example, the French employment centre Pôle emploi set up an outreach programme on its website. A questionnaire is available in French and Ukrainian by means of a QR code. The programme supports temporary protection beneficiaries in seeking employment, provides language courses and helps the beneficiaries to design their training and professional paths. Assistance is more effective in small cities and towns as it can be more individualised than in megacities like Paris or Nice, according to the experts interviewed [146].

In Slovakia, the offices of labour, social affairs and families developed a specific project for displaced people. It includes subsidised education training or language courses; financial measures to support mentored training with an employer; volunteering activity, for which temporary protection beneficiaries receive some compensation; and a financial contribution for temporary protection beneficiaries moving for work.

3.3.2 Language classes

The first measure taken to improve access to employment is language training (see consultation finding box). Many localities across the Member States introduced language courses for temporary protection beneficiaries. Usually local public employment services or institutions cooperating with them offered them (Belgium, Czechia, France, Italy, Poland, Romania and Slovakia). In other countries, other institutions were involved. In Dublin, Ireland, the City of Dublin Education and Training Board provides language courses and so do several private, community and voluntary sector organisations.

In Austria, the Austrian Integration Fund offers language courses in several localities. Similarly, in Germany, Ukrainian temporary protection status holders with a residence permit or provisional registration certificate ('fiction certificate') for temporary protection are entitled to access integration and occupational language courses [147]. The responsible authorities usually submit their applications for language and integration courses. In Estonia, free language courses are offered to people registered with the Unemployment Insurance Fund.

In Czechia, the Labour Office offers a wide range of language courses to temporary protection beneficiaries. Since the beginning of the armed conflict, 2,838 temporary protection status holders have attended a language course set up by the Labour Office (out of 440,863 temporary protection status holders from Ukraine present in Czechia at the end of January 2023).

In some Member States, certain requirements might have to be met. For example, in Estonia, free language classes are available through the Unemployment Insurance Fund once the person has been granted temporary protection and is registered as unemployed.

Some countries provide dedicated professional language courses. Poland, for example, provides language courses tailored to jobs in the gastronomy and hospitality sector [148].

FRA consultation findings on availability of language courses

Most responding organisations that support education, employment and housing considered that the offer of free national language courses was not or only partly sufficient. In Vienna, although courses are offered, they mentioned long waiting times, lack of childcare support and poor quality of the courses. In Dublin, there are not enough places on language courses, respondents mentioned.

In Sweden, courses are offered in only some cities, support organisations reported. In Gothenburg, respondents disagreed on whether places available in language classes are sufficient or not.

Both responding organisations from Bruges considered the offer sufficient.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

Promising practice: language training combined with employment (Katowice)

The labour office in Katowice organises language training. It includes a one-month intensive Polish language course, followed by employment combined with language learning one day per week.

This form of language training has proved particularly successful, according to a representative. After just one month, jobseekers were able to undertake employment that required some knowledge of Polish. At the same time, the new employees have a chance to continue improving their language skills in a more targeted way.

The length of the programme is usually six months. After that period, the employer can employ them on a regular basis.

Source: Katowice Labour Office, 26 January 2023

Obstacles to language acquisition were reported in several Member States. In Estonia, only temporary protection status holders registered as unemployed can access language classes. In Germany, at least a fiction certificate (a temporary document issued until the temporary protection beneficiary receives the residence permit) is required to enrol in language classes. In Dublin, there are long waiting lists for English courses that the City of Dublin Education and Training Board provides. In Slovakia, more language courses are needed, including at advanced level [149].

3.3.4 Facilitating access to the labour market for healthcare professionals

The European Commission issued a recommendation on the recognition of academic and professional qualifications for people fleeing Russia's invasion of Ukraine. It provides Member States' authorities with guidance and practical advice to ensure a quick, fair and flexible recognition process.

In Estonia, the Unemployment Insurance Fund has been cooperating with relevant ministries to find a way of recognising the qualifications of Ukrainian care workers and medical staff. With the support of the Estonian Academic Recognition Information Centre, the Unemployment Insurance Fund staff have been instructed how temporary protection beneficiaries can have their qualifications recognised [150].

Italy passed legislation in 2022 to allow temporary protection beneficiaries with health care qualifications to practise in Italy on a temporary basis. The European Qualifications Passport for Refugees sufficed, as an exception to the ordinary recognition procedures. The derogation was in force until 4 March 2023.

In Poland, the Law on assistance to Ukrainian citizens provided for a facilitated path to practising medical professions without undergoing the diploma recognition process. This measure was available only for 18 months from the start of the war on 24 February 2022. To continue practising their professions after this initial period, medical professional diploma holders need to undergo the diploma recognition process.

Promising practice: facilitating access to the labour market for professions in short supply (Vienna)

The city of Vienna, Austria, sought people from Ukraine who are trained in teaching, psychology, sociology or healthcare. The training of elementary teachers worked particularly well, according to a representative of the Public Employment Service, Vienna. Fifteen trained teachers were accepted into kindergartens in Vienna in December 2022.

Source: Public Employment Service, Vienna, 27 January 2023

3.4 Challenges for successful integration into the labour market

Local employment agencies faced several practical challenges in referring temporary protection beneficiaries to employment matching their qualifications, as the examples in the box illustrate.

FRA consultation findings on obstacles to labour market referral

The main obstacles to referring temporary protection beneficiaries to jobs that match their qualifications are, according to the 12 support organisations consulted, not speaking the national language well enough (Bruges, Brussels, Bucharest, Dublin, Gothenburg, Prague, Styria, Stuttgart, Vienna, Warsaw); a mismatch between skills and local labour market demand (Bruges, Brussels, Bucharest, Dublin, Gothenburg, Prague, Styria, Stockholm, Warsaw); difficulty in recognising their qualifications (Bruges, Brussels, Bucharest, Dublin, Gothenburg, Prague, Styria, Stuttgart, Vienna); and lack of work experience (Bruges, Bucharest, Gothenburg, Prague, Styria, Vienna). In Brussels, Bucharest, Styria and Warsaw, a major obstacle was employers not using public employment services to find workers, responding organisations mentioned. Other obstacles mentioned include an observed lack of motivation of temporary protection beneficiaries to look for work (Bucharest), temporary protection beneficiaries getting used to bad employment conditions and low salaries (Gothenburg) and that work permits are not issued quickly enough (Stuttgart).

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

3.4.1 Limited registration with public employment services

In several Member States, it is mandatory for temporary protection beneficiaries to register with the public employment services, which connect jobseekers with employers. In Austria and Belgium, it is not mandatory. Only some of them do. That was mentioned as an obstacle.

At the beginning of January 2023 among the 27,300 Ukrainian displaced people registered in Vienna, Austria, only 2,200 were registered with the Public Employment Service [151].

In Bruges, Belgium, only one in three Ukrainian displaced people of working age were registered with the Flanders employment service and only one third of them had found a job, according to official data from December 2022. Flanders is preparing new legislation that will make it mandatory for temporary protection beneficiaries to register with the Flanders employment service.

In Brussels, Belgium, few Ukrainians had registered with Actiris by July 2022, according to the media. Reports suggest that this is because many do not plan to stay in Belgium for long, because they are still looking for housing and childcare, or because of the language barrier.

3.4.2 Burdensome and time-consuming recognition of qualifications

In April 2022, the European Commission issued a recommendation about how Ukrainian nationals fleeing the war can access regulated professions. It provided Member States' authorities with guidance to ensure that the process of recognising qualifications is quick. Implementation varied

significantly across Member States by June 2023.

Recognising qualifications is important to ensure early integration of temporary protection holders, to increase their chances of finding employment in line with their skills and qualifications, and to ensure access to adequate housing, education, healthcare and other social services.

In several Member States, the recognition of diplomas and professional qualifications was reportedly a major obstacle (see consultation findings box). In Belgium, the process can be slow and complex [152].

Trutnov, Czechia, is an industrialised area that has given work to many temporary protection status holders. Despite the need for specialised positions in medical care and education, delays in recognising qualifications obtained in Ukraine meant it was not possible to immediately employ many doctors and nurses [153]. They soon left, allegedly claiming that they could easily find a qualified job in the Baltic states or in Canada.

In Poland, recognising diplomas obtained abroad is a difficult process, according to the representatives of different labour offices [154]. Sometimes applicants have to take additional courses or build up additional work experience to have their diploma recognised. The labour office provides information on where to apply and how to get financial support for the recognition process.

FRA consultation findings on length of recognition processes

Recognition of temporary protection beneficiaries' professional diplomas in the healthcare sector and in the education sector takes more than six months on average, in the experience of employment support organisations in Bruges, Dublin, Gothenburg, Vienna and Warsaw. In Bucharest, Stuttgart and Styria, it takes between one and six months. In Brussels, it may take less than one month to have diplomas recognised in either sector.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

Promising practice: self-declaration replacing recognition of qualifications in some cases (Berlin, locations in Romania)

In Berlin, the recognition procedure for beneficiaries of temporary protection has been simplified and bureaucratic hurdles have been reduced. Applications are now free and processing has been accelerated. Seventy-nine Ukrainian teachers were employed in Berlin by September 2022.

In Romania, if Ukrainian displaced people lack supporting documents proving their professional qualification or work experience, they can declare that they meet the conditions of professional qualification and experience required for the job. That allows them to be employed for 12 months, with a possible extension for one more year. This does not apply to regulated professions.

Source: Germany, Berlin Senate Department for Education, Youth and Family Affairs, February 2023; European Labour Authority, Overview of national measures regarding employment and social security of displaced persons coming from Ukraine: Country fiche – Romania*, February 2023*

3.4.3 Burdensome administrative procedures

In some Member States, delays in issuing residence permits slowed down the employment of temporary protection status holders. For example, in Stuttgart, Germany, the local Foreigners' Authority was slow to issue fiction certificates or residence permits. That represented a barrier to employing displaced teachers [155].

In Slovakia, temporary protection beneficiaries have to apply for a temporary residence permit to run their own business. That is considered a major limitation [156].

On the other hand, quick issuance of residence and employment permits facilitates smooth labour market integration. National authorities' representatives mentioned this in Styria, Austria, where it is the employer who applies for the employment permit. In Romania, Ukrainian citizens can be employed without a work permit; however, they need a work permit to be covered by health insurance.

3.4.4 Limited childcare places

Many temporary protection beneficiaries of working age are women with children. Some Member States therefore used legal entitlements to childcare for jobseekers.

For example, in Austria, people in a further education programme of the Public Employment Service, Vienna, have the right to childcare [157]. In Brussels, the job mediation centre Actiris

manages four daycare centres where jobseekers can leave their children when they go to a training course or a job interview, for example. In Poland, labour offices reimburse temporary protection beneficiaries the costs of caring for children up to seven years old and for dependent people.

The limited availability of childcare services was mentioned as a barrier in some Member States or specific cities within Member States. It discourages Ukrainian displaced women from looking for work.

For example, in Austria, sufficient childcare places for children under the age of three are reportedly available in Vienna but not in Graz. In Brussels (Belgium), childcare places are reportedly not always available [158]. In Germany, enough language courses are available on site, but not enough language courses with childcare [159]. In Romania, limited childcare was considered one of the two barriers to employment, together with language [160]. In Slovakia, lack of childcare is considered an obstacle to finding and keeping a job [161].

In Poland, childcare places are available for Ukrainian displaced children [162]. However, Ukrainian mothers are not always willing to send very young children to kindergartens [163].

3.4.5 Opening bank accounts

In Romania, temporary protection status holders encountered difficulties when opening bank accounts. In Estonia(see promising practice box), some banks accept a document issued in Ukraine, together with a temporary protection certificate or a copy of the decision to issue a residence permit. However, others require a document issued in Estonia.

Promising practice: facilitating opening bank accounts (Saaremaa; locations in Germany)

In Saaremaa, Estonia, temporary protection beneficiaries were strongly recommended to open bank accounts, according to the Saaremaa municipal government, consulted in January 2023. In spring 2022, an information point for beneficiaries of temporary protection was set up in Saaremaa. It directed them to open bank accounts once they were issued personal identification codes. Banks also carried out outreach activities themselves, inviting temporary protection beneficiaries to open bank accounts.

In Germany, BaFin facilitated access to a basic bank account. Banks are allowed to open up a bank account for people displaced from Ukraine who do not have a Ukrainian passport or recent Ukrainian ID document but can submit any Ukrainian identity document in connection with a document issued by a German authority, such as a certificate of initial registration, fiction certificate or registration certificate.

Source: Germany, BaFin, 'BaFin erleichtert Kontoeröffnung für Flüchtlinge aus dem ukrainischen Kriegsgebiet', 7 April 2022

3.4.6 Other barriers

Austria did not permit the employment of Ukrainians as 'temporary workers', in other words through temporary work agencies. That constituted a barrier to employment according to some experts [164]. This changed in April 2023 with an amendment to the Act Governing the Employment of Foreign Nationals (AuslBG). It exempted displaced residents, thus allowing them to take up any employment without permits, like Austrian nationals.

4. Healthcare

Access to adequate healthcare is essential for physical and mental health (see 'Legal corner'). Untreated chronic conditions can increase the long-term healthcare costs for individuals and host countries.

Legal corner

The TPD requires Member States to provide for medical care, including at least emergency care and essential treatment of illness, and to provide necessary medical or other assistance to temporary protection beneficiaries who have special needs, such as unaccompanied children or people who have experienced torture, rape or other forms of serious violence (Article 13). Article 35 of the Charter grants everyone the right to access preventive healthcare and the right to benefit from medical treatment under conditions established by national laws and practices. The Treaty on the Functioning of the EU emphasises in Article 168 that a "high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities".

In Article 11 of the European Social Charter (Revised), Member States agreed to take measures to ensure the effective exercise of the right to protection of health. The Istanbul Convention (Article 22) requires parties to take measures to provide specialist support services to women victims of violence and their children and ensure that preventive and protective measures take into account the needs of vulnerable people (Articles 12 and 18). Victims of torture have a right to full rehabilitation, as Article 14 of the UN Convention against Torture states.

4.1 Measures facilitating access to healthcare

Healthcare is primarily in the remit of Member State central authorities. Local authorities support access to services, and share in the responsibility for managing healthcare facilities to some extent. This section describes three measures that have facilitated access to healthcare at local level, illustrating them with examples.

4.1.1 Registration with insurance schemes

Local authorities facilitated registration for healthcare in conjunction with registration for temporary protection.

In Austria, displaced people are entitled to benefits of the regular healthcare system as soon as they register for temporary protection [165]. Staff of the provincial police are present at the arrival

centre in Vienna and generate national insurance numbers directly as part of the initial police registration [166] .

In Belgium, displaced people can register for free public health insurance upon applying for temporary protection.

In France, all displaced people from Ukraine with temporary protection status in France may benefit from universal health protection and complementary health insurance. That immediately covers health costs, besides family benefits and free childcare. The insurance coverage is issued automatically upon obtaining temporary protection status, and is valid for 12 months.

In Ireland, temporary protection beneficiaries are entitled to a medical card, which allows them to visit a doctor for free. They can also obtain medication and other medical services at a reduced price.

4.1.2 Integrating healthcare staff from Ukraine

Local healthcare facilities benefited from facilitated integration of healthcare staff from Ukraine. That included eased requirements, upgrading courses and supervision programmes.

In Czechia, for example, the health system had relied on medical professionals from Ukraine for many years. A total of 693 doctors who had acquired their diplomas in Ukraine were already working in the country by 3 March 2022, just after the beginning of the war.

The arrival of displaced people, especially mothers with children, increased the demand for doctors providing primary care for children and adults, as well as speech therapists, psychologists and special educators. For this reason, Czechia eased qualification requirements for certain professions were eased in the fields of education, psychology and speech therapy. A special recognition process applies to temporary protection beneficiaries who are medical professionals with diplomas acquired outside the EU. Doctors must spend at least three months under the supervision of a doctor with a recognised diploma before they can start practising on their own.

In Estonia, the Ministry of Social Affairs created guidelines for integrating temporary protection beneficiaries into the Estonian healthcare system. To work as a healthcare worker in Estonia, healthcare professionals with education from third countries must be registered with the Health Board. It checks that their education complies with Estonian requirements.

Since temporary protection beneficiaries may not have original documents regarding their education or work experience, the Ministry of Social Affairs cooperates with Ukrainian institutions to accept documents from Ukrainian registers in electronic form. The person is then directed to take a compliance exam. It consists of work practice and a theory exam in Estonian.

Nurses and midwives can work in Estonia as caregivers or in other support functions, since their education in Ukraine is shorter than it would be in the European Union. In cooperation with healthcare universities, a study programme specially aimed at Ukrainian nurses is being

developed.

In Poland, local authorities have helped healthcare professionals to find internships or voluntary service opportunities in local clinics and hospitals during the diploma recognition process [167].

Promising practice: medical staff from Ukraine providing healthcare (Bratislava)

The outpatient clinic in Bratislava, Slovakia, mostly employs Ukrainian temporary protection beneficiaries as medical staff. The exception is the head of the clinic, who is a Slovak doctor, on whose medical licence the clinic and the supervising doctors are registered. Ukrainians work under the supervision of Slovak doctors during the process of recognising their medical qualifications. Payments from the insurance company do not cover the running costs of the clinic, so it depends on financial support from the Bratislava self-governing region and UNICEF. Although the capacity of the clinic is limited, several experts perceive the clinic as a great advantage in comparison with other locations, which do not have such clinics.

Sources: Slovakia, interview with the head of the outpatient clinic for temporary protection holders from Ukraine, Bratislava, 23 January 2023; interview with the head of the Integration Department of the City Office, Bratislava, 19 January 2023; interview with a representative of Mareena, Bratislava, 27 January 2023

4.1.3 Provision of information

Local authorities have provided specific information on healthcare rights, including through information campaigns, counselling and specific websites. Examples include Tallinn, Warsaw, Katowice and Lublin.

In Bruges, Belgium, guides in diversity, social services case workers and care point staff regularly inform temporary protection beneficiaries about the Belgian healthcare system [168]. The Brussels regional government created a special health orientation centre that provided personalised information on accessing the health system until its closure in December 2022.

In 2023, the organisation of a Social and Health Orientation Centre was entrusted to the Ukraine Voices Refugee Committee. That is a non-profit organisation that Ukrainian volunteers created under the umbrella of the United Nations Refugee Agency. The centre will be in a community centre, where activities organised by and for the community take place [169].

In France, a leaflet available in French and Ukrainian informs temporary protection beneficiaries and medical insurance organisations about beneficiaries' rights regarding covering the costs of consultations, treatments and medicine.

In Ireland, the Health Service Executive (HSE) has a thorough guide to the Irish health systemin English and Ukrainian for refugees and other migrants (see promising practice box). HealthConnectis a multilingual mobile-friendly website. It provides information on accessing health services for migrant communities in Ireland and is available in Ukrainian. Spunout has information specifically for children and young people on healthcare access across Ireland. The HSE website also provides information on how to access free, safe, and confidential sexual assault treatment units and about services for people with disabilities.

Local health authorities in Lublin and Warsaw, Poland, recognised the difficulty of providing information on healthcare [170]. Warsaw therefore developed leaflets and posters on the functioning of the healthcare system, in Polish and Ukrainian, and opened a special hotline providing information on health services [171]. Medical care coordinators were appointed in all healthcare entities created by the city. Their job was to cooperate with the Social Welfare Coordinator in identifying and securing the health needs of displaced people and to organise adequate medical care on the premises of the medical facility [172]. Information campaigns focused on specific issues, for example the campaign on vaccinations for children carried out in cooperation with UNICEF.

In Slovakia, the Ministry of Health told healthcare providers how much healthcare to provide to temporary protection status holders and applicants, and anyone fleeing the war in Ukraine [173]. The General Health Insurance Company also prepared a manual on how to report each medical procedure for reimbursement. However, healthcare providers tended to refuse patients from Ukraine, as they did not have enough information about how they would be reimbursed [174].

Promising practice: guidance for healthcare staff (Gothenburg)

Västra Götaland Regional Council in Sweden set up a special organisation to deal with health issues among displaced Ukrainians. It brought together information for caregivers on a website, initiated special training for healthcare staff and held regular information and discussion meetings involving all relevant local authorities.

Source: Sweden, Västra Götaland Regional Council, February 2023; website *on care for people from Ukraine*

Promising practice: information on healthcare rights (Ireland)

The Health Service Executive (HSE) has a thorough guide to the Irish health system for refugees and other migrants, in English and Ukrainian. It contains information on how to access different types of healthcare, including specialist services.

In addition, the Dublin City Council and Dublin City local community development committee set up the Dublin City Ukraine Response Community Noticeboard. It contains information in English, Ukrainian and Russian about how to access services such as healthcare, child welfare services and education.

4.2 Challenges to ensuring access to healthcare

Pre-existing bottlenecks in Member States' healthcare systems made it difficult for local authorities to ensure healthcare for all arriving temporary protection beneficiaries.

Specific obstacles relate to additional administrative requirements for healthcare professionals, gaps in healthcare rights or insurance coverage, the need for psychological care, language barriers, and identifying and considering people with special needs.

FRA consultation finding on obstacles to healthcare provision

The most prevalent challenges mentioned by the eight health organisations consulted were as follows:

There were delays in health coverage for people who had not yet applied for temporary protection (Brussels). Beneficiaries lacked temporary medical cards or information about healthcare (Brussels, Bucharest, Vienna). It was unclear what implications returning to Ukraine had for health insurance (Brussels).

Healthcare professionals lacked information (Brussels, Bucharest, Vienna). Medical staff had limited capacity (Brussels, Dublin, Prague). Funding for medicines was insufficient (Bucharest). There was a shortage of professional interpreters (Brussels, Bucharest, Vienna).

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

4.2.1 Capacity constraints and administrative burden

In many locations, healthcare workers faced more administrative tasks when treating temporary protection beneficiaries than when treating other patients. In some, this resulted in delays/long

waiting lists, overuse of emergency care, limited specialist attention or delayed medical procedures.

As solutions, local authorities contracted private practices (Tallinn) [175] , provided lists of doctors who accept new patients (Bruges) [176] , identified family doctors for refugee-inclusive clinics (Bucharest), operated low-threshold drop-in clinics (Bratislava) and facilitated the integration of healthcare professionals from Ukraine (Czechia, Estonia, Poland, [177] Slovakia).

Czechia, for example, lacks family doctors and specialised doctors. Two in five temporary protection beneficiaries considered the capacities of the healthcare system to be insufficient, according to a survey conducted in September 2022. Some explicitly stated that doctors did not accept them as patients.

In Tallinn, Estonia, family doctors may refuse to accept new patients, which has affected temporary protection beneficiaries. A contract with the private practice Confido has proven helpful. It allows displaced people to immediately receive high-quality service and, if necessary, referral to other specialists [178] .

The town of Portmagee in Kerry, Ireland, has only four GPs in the area and is far away from acute hospital services. Local councillors have expressed concern that meeting the needs of those living there is proving to be a challenge. Rural access to family doctors became even more difficult for temporary protection beneficiaries because they were accommodated in large groups and transport was challenging [179] . A major challenge arose when temporary protection beneficiaries applied for medical cards and the authorities subsequently moved them to other accommodation without organising a forwarding service [180] .

A general lack of family doctors makes it challenging in certain parts of the country for temporary protection beneficiaries to get a named family doctor on their medical cards. To address this issue, sessional family doctor clinics are being arranged at accommodation centres [181] .

In Bucharest and Constanța, Romania, temporary protection beneficiaries had only a minor impact on the medical system despite unlimited access under the same conditions as for Romanian citizens. However, technical difficulties in registering with a family doctor were a common barrier.

Only the few family doctors that the authorities listed for each county accepted patients from Ukraine, for bureaucratic reasons. A consultation takes longer than with Romanian patients because of administrative requirements. Doctors receive less financial compensation. In some cases, doctors refused patients from Ukraine, as their temporary protection ID cards did not show a registered address because they moved frequently or were in collective accommodation.

For this reason, temporary protection beneficiaries in Bucharest resorted to emergency services even for non-emergency conditions.

In Bratislava, Slovakia, doctors often refuse temporary protection beneficiaries because they are unable to accept new patients or fear that the General Health Insurance Company will not

reimburse the medical procedure. Specialists can only report medical procedures under three codes that the Ministry of Health has specifically designated for healthcare provided to temporary protection beneficiaries. The lump sums corresponding to these codes do not fully cover the real costs of the medical procedures [182].

Furthermore, the General Health Insurance Company does not always reimburse the costs of medical procedures provided to temporary protection beneficiaries. In such cases it tends to inquire specifically if the procedure was necessary and why, before paying [183]. This requires additional administrative effort.

In Bratislava and Nitra, support organisations such as Tenenet help temporary protection beneficiaries trying to set up appointments with specialist doctors [184]. However, this is a time-consuming additional task. It may take some 30 phone calls to get through to the specialist needed [185]. For this reason, the outpatient clinic for temporary protection holders from Ukraine has also treated patients with chronic diseases unless specialist attention was absolutely necessary.

4.2.2 Gaps in healthcare rights or insurance coverage

In most Member States, people gain more healthcare rights when they registration or receive temporary protection permits. That entitles them to statutory healthcare provided within the public health insurance system as well as emergency care.

An exception is Slovakia, where temporary protection beneficiaries may only get medically indicated necessary care. They have full benefits as available to nationals only if they are employed for more than the minimum wage (€ 646 a month).

In Sweden, beneficiaries can still have only the same care asylum applicants. That includes emergency medical care, emergency dental care and medical care 'that cannot wait' subject to the health service's assessment.

Gaps may also arise if healthcare access depends on permits that are not yet issued. For example, in Belgium, it is difficult to register for health insurance without a residence permit and to have disabilities recognised [186]. In exceptional cases, social services can provide access to urgent medical help before a person is registered for temporary protection, according to instructions from the Federal Department for Social Integration.

In Germany, one needs a residence permit or a fiction certificate to be entitled to general healthcare benefits. Until then, beneficiaries have the same access to healthcare as asylum applicants.

In Ireland, temporary protection beneficiaries are entitled to the same medical care and social welfare benefits as Irish citizens. To access services, some of which are free of charge, they must apply for a medical card.

In Italy, temporary protection beneficiaries similarly need to get a health card after registering with the local health authorities and getting a fiscal code. The card allows them free prescriptions and visits by GPs and/or paediatricians. Lazio region provided a guide listing the bodies authorised to issue the card.

In Poland, access to healthcare generally requires a PESEL. Temporary protection beneficiaries may apply for one within 30 days. However, one may also prove one's right to healthcare benefits by submitting a declaration instead of a PESEL. The Ministry of Health developed a template for such a declaration in Polish, Ukrainian and Russian.

FRA consultation finding on scope of healthcare

Health support organisations responding to FRA's question have split opinions about whether healthcare coverage of temporary protection beneficiaries sufficiently addresses their needs. Four say it does not (in Bucharest, Dublin, Prague and Vienna).

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

4.2.3 Psychological care/mental healthcare

Many people have trauma resulting from war-related experiences. That makes access to mental healthcare crucial. In most Member States, temporary protection beneficiaries may access psychological and psychiatric care as provided in the national healthcare system. They usually require a referral by a GP.

In practice, psychological care is primarily provided by NGOs, for example in Bratislava, Nitra, Styria and Vienna. Services are more easily and quickly accessible than those through the public healthcare system. They are free of charge, with a low threshold and/or with interpreters or Ukrainian- or Russian-speaking professionals. Common challenges include long waiting lists, the lack of sufficient specialists and interpretation arrangements.

In Vienna, Austria, access to psychological care is provided in cooperation with NGOs. Sometimes there are long waiting times and fees [187].

In Belgium, public health insurance only partly covers psychological care. In Bruges, free of charge offers, for example provided by a psychologist from social services or NGOs such as Solentra, may entail long waiting times [188].

In Saaremaa, Estonia, children receive support from school psychologists. Adults face long waiting times, as the number of psychologists is limited, although Ukrainian psychologists have been employed for help [189]. The Tallinn refugee centre employs two Ukrainian psychologists offering free consultations and would benefit from a third psychologist [190].

In Naples, Italy, NGOs help temporary protection beneficiaries to access psychological services. Many of them report post-traumatic stress disorder [191]. The NGO ActionAid noted language and cultural barriers. They sometimes result in a lack of cooperation from the authorities [192].

In Bratislava, Slovakia, it is mainly NGOs such as Tenenet that provide psychological help at local level [193]. Psychiatric outpatient clinics were overburdened in mid-2022 [194].

Promising practice: facilitating contact with local support organisations (Warsaw)

In Warsaw, Poland, outpatient clinics established psychological and psychiatric help points staffed by psychologists and doctors fluent in Ukrainian or Russian. Local psychological and pedagogical counselling centres in Katowice, Lublin and Warsaw, employing Ukrainian- and Russian-speaking psychologists, offer help for children and their parents. Local authorities provide information and contact details of various organisations providing psychological support in Ukrainian and Russian.

Source: Poland, 'Pomoc medyczna dla obywateli Ukrainy'

4.2.4 Interpretation

Local authorities in many Member States considered the language barrier the main challenge in providing healthcare.

FRA consultation findings on interpretation in healthcare

The eight health organisations consulted considered that interpretation in healthcare settings is only sometimes (Brussels, Dublin, Prague, Stockholm, Vienna) or rarely (Brussels, Bucharest, Vienna) available when needed. Suggestions to address possible gaps in the provision of healthcare consistently referred to increasing information on healthcare rights.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

Health insurance usually does not cover the costs of interpreters necessary for medical treatment (see consultation findings box). However, reimbursement may be possible upon application in special individual cases where necessary (Germany, Estonia) [195]. An exception is Ireland. The HSE has a duty under legislation to ensure that information and services are accessible to all (see promising practice box). In practice, that requires hospitals to request the services of an interpreter if needed, at no cost to the patient [196].

Local-level solutions have included video interpretation (Vienna) [197], relying on volunteers from

the Ukrainian community (Stuttgart) and employing Ukrainian- or Russian-speaking healthcare staff (Saaremaa, Lublin, Warsaw) [198]. Local authorities consulted considered it useful to establish short-term agreements with interpreters and a structured procedure for involving them temporarily in case of future need.

In Brussels, Belgium, various services partly resolved language barriers. Examples were the NGOs Caritas, SeSo and Convivial; the mobile team organised by Ukrainian Voices Refugee Committee [199]; and Brussels Onthaal and SeTIS [200]. In Bruges, health professionals and social service case workers can use the interpretation service of social services. It has approximately 15 interpreters for Ukrainian and Russian.

In Tallinn, Estonia, local authorities may reimburse translation costs during the first two years after protection is granted. They receive funding for this based on contracts with the Social Insurance Board. It will pay translation costs for administrative situations in local governments, state institutions, educational institutions and “other places that require translation”. However, the procedure for applying for the compensation is unclear.

Saaremaa municipality used this option often: some 200 times by the end of December 2022. Its Kuressaare hospital employed one Ukrainian- and Russian-speaking temporary protection beneficiary as an interpreter while also using online translation services such as Google Translate [201].

In France, temporary protection beneficiaries were uncomfortable relying on Russian-speaking interpreters, NGOs pointed out [202].

Local authorities in Germany set up agreements with hospital associations to offer scheduled time slots with interpreters. In Stuttgart, the relevant city department quickly set up a pool of interpreters with the help of the local Ukrainian community [203]. In Berlin, the programme SprInt offers language mediation in the health sector. It has increased and supplemented its services by adding Ukrainian and Russian language mediation [204].

The city of Lublin, Poland, cooperated with the Voluntary Service Centre. This organisation offers various forms of support to migrants, including assistance with visits to doctors. However, there is no legal requirement to provide interpretation during visits to doctors or hospitals.

In Romania, doctors often used online translation tools. In Constanța, an integrated community centre was set up that also hosts interpreters.

Promising practice: healthcare card (Kerry)

Ireland already had an emergency healthcare record card for refugees from Iraq and Syria. Kerry piloted rolling it out in Ukrainian. The card is useful for people with little knowledge of English who need emergency treatment, as it contains important details such as allergies, medication and emergency contacts.

Source: Ireland, Kerry HSE, 1 March 2023

4.2.5 Responding to people with special needs

The TPD requires Member States to provide medical or other assistance to people who have special needs (see consultation findings box), such as unaccompanied children or people who have undergone torture, rape or other serious forms of violence. The high prevalence of vulnerability among arrivals made it difficult for local authorities to provide adequate support. In addition, many displaced people had further or multiple vulnerabilities besides the examples listed in the TPD. This required flexibility and a broad interpretation of assistance required for people, for example, single parents with children, traumatised people, possible victims of trafficking or people susceptible to labour exploitation.

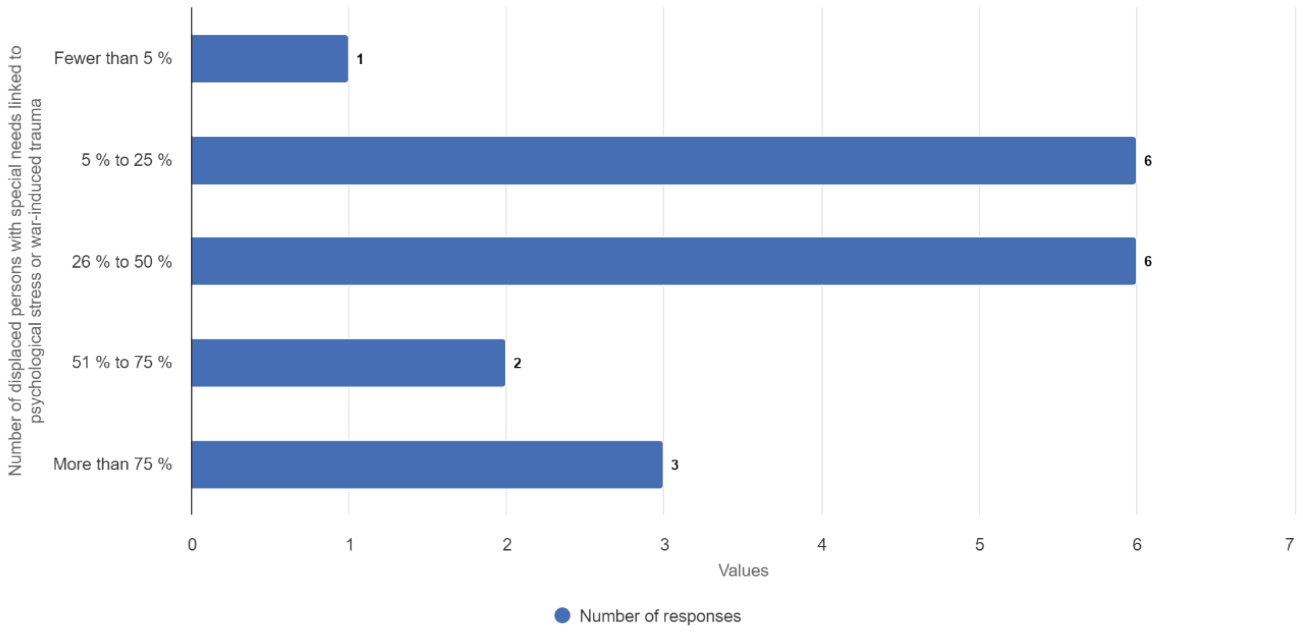
FRA consultation findings on prevalence of special needs

Most of the support organisations that FRA consulted estimate that more than 25 % of the displaced people they support have special needs linked to psychological stress or war-induced trauma (Figure 4). Health organisations in Bucharest, Lublin and Styria estimate the percentage to be 75 %.

Besides medical assistance, “other assistance” to people with special needs provided at local level included social and psychological counselling, counselling of pregnant women, financing abortions for victims of rape, specialised care for unaccompanied children, victim support services and post-traumatic stress disorder support. Local authorities adopted different ways of identifying and assisting vulnerable people. They often relied on procedures set up during previous large-scale arrivals of refugees.

Source: FRA online consultation with 30 support organisations in 17 locations, June 2023

Figure 4 – Displaced people with special needs linked to psychological stress or war-induced trauma



Alternative text: A bar chart showing how many organisations gave each answer. One organisation responded 'fewer than 5 %', six responded '5 % to 25 %', six responded '26 % to 50 %', two responded '51 % to 75 %' and three responded 'more than 75 %'.

Question: "Based on your experience supporting displaced persons, how many have special needs linked to psychological stress or war-induced trauma?" 12 respondents indicating 'don't know' are not reflected in the numbers.

Source: online consultation with 30 support organisations in 17 locations

Local authorities provided support to people with special needs, primarily those with disabilities and people who had experienced violence or torture.

Styria, Austria, saw an especially high number of victims of torture in late summer and autumn 2022, including from occupied territories in Ukraine [205]. Victims were frequently identified during German language courses and in seminars dealing with issues of victim support in Austria. Almost all displaced Ukrainians attend these language courses, so they are very likely to access information and contact details about these services. Thus, organisations that provide language courses are good sources of information about this [206]. The Integration Centre Styria refers clients to an NGO called Zebra, which offers psychological support and trauma therapy, or to the women's shelter. In Vienna, referrals are made to the association Hemayat – Care Centre for Torture and War Survivors [207].

In Poland, when people are suspected of having suffered psychological, physical and sexual

violence, the procedure includes several stages. Initial verification is through an interview and examination. Detailed information about the available support is provided. Then come medical examination and treatment. Information is forwarded to the police, unless the violence was in Ukraine, and/or the local centre for family assistance.

Community healthcare organisations (CHOs) in Dublin and Kerry, Ireland, have created mobile, or in-reach, teams. They go into accommodation settings to conduct health assessments, through which they hope to catch any particular special needs. Setting up health assessments immediately upon arrival proved not conducive to disclosure of violence or mental health needs.

Dublin's CHO9 has made referrals to the National Centre for Survivors of Torture in Ireland for specific mental health support when it has identified victims of torture [208]. South Dublin County Council's website also provides information on services for those experiencing violence.

When CHO4 in Kerry goes into group accommodation settings and meets unaccompanied children, the members look for documentary evidence that a family member is present with them. If not, they refer the child to Tusla [209].

There is huge stigma around mental health in the Ukrainian population. Members are reluctant to contact the police, and do not trust state institutions to report abuse taking place in accommodation [210]. Differences in disability schemes are an obstacle to accessing adequate care [211].

Practical handbook on sexual and gender-based violence

The International Federation for Human Rights released a Ukrainian version of its handbook on sexual and gender-based violence. It summarises the key dos and don'ts of engaging with survivors. The glossary is intended to inform practitioners of the essential terms, the context in which such crimes are committed, and the standards that stakeholders must adhere to when engaging with survivors.

Source: International Federation for Human Rights, 'Sexual and Gender-Based Violence: FIDH glossary available in Ukrainian'

Concerning assistance to people with disabilities, the Integration Centre in Styria reported challenges in dealing with deaf-mute temporary protection beneficiaries, since communication had to be paid for privately or through donations [212]. In Vienna, qualified case managers assess the needs of temporary protection beneficiaries with disabilities [213]. Benefits from the disability assistance or care system are also granted, subject to the same prerequisites as for anybody else.

Promising practice: adjusting to evolving healthcare needs (Vienna)

Responding to the acute traumatisation among displaced people, the Vienna Social Fund, in cooperation with support organisations, provided psychological care and psychiatric outreach consultations. As it became obvious that there was a great need for care for children and adolescents, healthcare offers increasingly included this target group. The regular structured exchange of information and networking among the relevant organisations has proven effective.

Source: Austria, Vienna Social Fund, 24 January 2023

Tableexample, they book appointments and refer them to specialised services such as *Huis van het Kind* ('House of the Child') or the *FOD Personen met een handicap* (Federal Agency for People with a Disability). In Brussels, the administrative recognition of disabilities can present barriers. Some people had difficulties understanding what their health insurance covered and the additional costs involved [214].

In Bucharest and Constanța, Romania, local authorities had limited resources to ensure access to rehabilitation centres for children or adults with disabilities. The centres offered services such as speech therapy, behavioural therapy for children diagnosed with autism, and physiotherapy for people recovering from injuries or other chronic illnesses. Several NGOs provided some of these services in both Bucharest and Constanța [215].

In Slovakia, victims of sexual violence from Ukraine do not systematically receive assistance. The COMIN centre had several victims of sexual violence in its care, and cooperated with the Slniečko Centre, helping abused and sexually abused children and victims of violence [216].

The Tenenet Association assesses the kinds of disability and related restrictions of children from Ukraine so that they can receive financial benefits. It cooperates with UNHCR, UNICEF and the NGO Platform of Families of Children with Disabilities. The municipality in Nitra opened a grant programme that would make it possible to apply for reimbursement for medical devices and medicines for children from Ukraine under two years of age.

Conclusions

The Temporary Protection Directive is the key EU legislative instrument providing people displaced from Ukraine with access to housing, education, employment and healthcare in EU Member States. Member State authorities had no prior experience in implementing the directive, because it was first activated in March 2022. Local authorities took the lead in ensuring access to rights under temporary protection.

Recurrent challenges and various good practices, outlined throughout the report, have emerged to different extents. Advantages could be realised in locations that engaged the local population as hosts and volunteers, actively involved Ukrainian communities and adjusted existing frameworks for employment, education and healthcare, scaling up local capacities and applying administrative flexibility. Local labour market demands and language similarities also clearly helped temporary protection beneficiaries into employment in some locations.

One of the most consistent challenges has been the uncertainty about the length of stay. Planning the demand for housing or schooling has been challenging in many locations. Numbers of people from Ukraine residing locally have fluctuated, or authorities have lacked the information. That has made it difficult for local authorities to adjust support measures to demand. The uncertainty has also affected employers and landlords as well as displaced people themselves.

Meanwhile, the duration of temporary protection has been extended until March 2025. Therefore, it is ever more important to shift to long-term solutions and support local authorities through the priority actions outlined in this report.

Annex 1 – Methodology

The report draws on the findings of desk research and consultations with local and national authorities in 2022 and 2023. It is based on desk research and individual consultations with local authorities and organisations, primarily carried out between November 2022 and March 2023, in the 26 selected locations across 12 EU Member States. Consultations included written or oral input provided by local authorities responsible for supporting temporary protection beneficiaries to access housing, education, employment and medical care. In a few cases, where it is mainly national law that addresses these policy fields, national authorities were consulted.

FRA's multidisciplinary research network, Franet, conducted desk research. On this basis, it later carried out detailed, targeted interviews and consultations with local authorities, carried out in-person or over the phone, and email exchanges. Table 1 shows the total number of authorities consulted, either through in-person or phone interviews or email requests (see also Annex 2). In some cases, more than one staff member was interviewed and some stakeholders were consulted more than once. National authorities were also consulted where they are primarily responsible for certain aspects of temporary protection-related rights.

The consultations helped to illustrate the measures taken and challenges arising in practice at the specific location. The examples provided in the text are not representative of the Member States. Some local authorities had to decline requests for consultation because they were overloaded with work or the locally responsible resource people could not be identified. In those few cases, the research reverted to local support organisations, including NGOs.

Table 1 – Number of authorities/stakeholders consulted, November 2022 to March 2023

Member State and locations	Total number of consulted authorities	Local-level authorities	National-level authorities
Austria (Graz/Styria, Vienna)	6	6	
Belgium (Bruges, Brussels)	11	11	
Czechia (Prague, Trutnov)	7	7	
Estonia (Saaremaa, Tallinn)	8	3	5
France (Alpes-Maritimes, Île-de-France)	7	5	2
Germany (Berlin, Stuttgart, Uckermark)	14	14	
Ireland (Dublin, Kerry)	9	7	2
Italy (Naples, Rome)	4	4	
Poland (Katowice, Lublin, Warsaw)	10	10	
Romania (Bucharest, Constanța)	6	6	
Slovakia (Bratislava, Nitra)	17	15	2
Sweden (Gothenburg, Malmö)	12	12	
Total	**111**	**100**	**11**

Alternative text: . Table 1 lists the total number of authorities/stakeholders consulted per country covered by this report. Slovakia with 14 consultations leads the list, followed by Germany with 14 and Poland with 10. Italy with 4 consultations closes the list.

In addition, FRA carried out online consultations with 30 local organisations supporting temporary protection beneficiaries in 17 of the 26 locations covered by this report, in May and June 2023 (see Annex 3). They included organisations providing support to access housing (9 organisations), education and childcare (13 organisations), employment (12 organisations) and healthcare (8 organisations).

The consultations focused primarily on challenges and needs to improve the provision of support in these areas and were an opportunity to cross-check information obtained through the interviews with local authorities. They combined open and closed questions on the main challenges encountered, prepared in light of the findings of FRA's Fleeing Ukraine survey of displaced people's experiences in the EU. The analysis did not reflect replies indicating 'don't know' unless they had a particular meaning for the specific question. Examples from the online consultations are presented in boxes.

FRA invited organisations to contribute to the consultation if they had agreed to be contacted in the research that Franet carried out. FRA also invited interested partners of its Fundamental Rights Platform, which is the agency's channel for cooperation and information exchange with civil society organisations working on fundamental rights in the EU. The online consultation was open between 3 May and 16 June 2023.

Given the small number of respondents, the results cannot be considered representative. They are merely examples of challenges that support organisations experienced in their areas of work and locations. The results of the consultation are included separate boxes throughout the report. Figures reflecting quantitative data are based on the numbers of respondents to the specific questions.

National authorities checked the report for factual accuracy in July 2023.

This report refers to those fleeing Russia's war of aggression against Ukraine as 'displaced people'. They include Ukrainian nationals and other non-EU nationals. A 'refugee', as defined in the 1951 Refugee Convention (introductory note), is "someone who is unable or unwilling to return to their country of origin owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group, or political opinion" and who has crossed an international border to find safety in another (here, EU) country. Refugees may or may not be beneficiaries of the TPD.

Annex 2 – Stakeholders consulted

Austria

Styria

- Integration Centre Styria (Regional Consulting Centre of the Austrian Integration Fund) – 24 January 2023.
- Public Employment Service, regional branch, Graz – 23 December 2022.
- Department of Education and Integration, City of Graz – 12 January 2023.

Vienna

- Office of the Vice Mayor of Vienna and Executive City Councillor for Education, Youth, Integration and Transparency – 31 January 2023.
- Public Employment Service, regional branch – 27 January 2023.
- Vienna Social Fund – 24 January 2023.

Belgium

Bruges

- Coordinator of the City Council – 27 January 2023.
- Guide in diversity – 2 February 2023.
- PSCW President and coordinators of the City Council and the PCSW – 10 January 2023.
- Coordinator of the PCSW – 23 January 2023.
- VIVES University – 24 January 2023.

Brussels

- Coordinator at the Brussels Capital Region – 31 January 2023.
- Manager of collective facility Hotel Leopold – 6 February 2023.
- Helpdesk Ukraine, Caritas International – 2 February 2023.
- Assistant coordinator of the Ukraine team at the PCSW of Woluwe-Saint-Pierre – 8 February 2023.

- Schools Service of the Brussels Government Centre for Expertise, Perspective. Brussels – 21 February 2023.
- Host families project manager, Municipality of Schaarbeek – 30 January 2023.

Czechia

Prague

- Prague Municipality – 20 and 25 January, 3 February and 23 March 2023.
- Centre for Follow-up Support of Ukrainian Refugees – 24 March 2022 and 3 February 2023.
- NGO META – 20 January 2023.
- Labour Office – 15 February 2023

Trutnov

- Municipal official from Trutnov who coordinated most municipally led initiatives concerning displaced people from Ukraine – 17 February 2023.
- Municipal office worker – 17 and 27 February 2023.
- Community centre – 3 March 2023.

Estonia

National level

- Ministry of Education and Science – 30 January 2023.
- Ministry of Social Affairs – 30 March 2022.
- Unemployment Insurance Fund – 30 January 2023.
- Labour Inspectorate – 5 January 2023.
- Social Insurance Board – 6 February 2023.

Saaremaa

- Saaremaa Municipality Government – 12 January 2023.

Tallinn

- Head of the Department for Supporting the Integration of New Immigrants, Tallinn City Government – 17 January 2023.
- Education Department, Tallinn City Government – 10 January 2023.

France

National level

- Pedagogical Continuity project, Ministry of Education, – 3 March 2023
- Department of Education, Prevention and Family Ties, French Red Cross.

Alpes-Maritimes

- NGO Agir pour le Lien social et la Citoyenneté, manager of collective housing for temporary protection beneficiaries.
- French Association of Ukrainians of the Côte d'Azur, 18 January 2023.

Île-de-France

- NGO France terre d'asile, operating in the main registration centres for displaced people from Ukraine in Paris – 25 January 2023.
- NGO Equalis, manager of collective housing for temporary protection beneficiaries – 27 January 2023.
- Mon coeur ukrainien – 18 January 2023.

Germany

Berlin

- Berlin State Office for Refugee Affairs – January 2023.
- Department of Integration and Migration, Berlin Senate Department for Integration, Labour and Social Affairs – January 2023.
- Department for Family Affairs and Early Childhood Learning, Berlin Senate Department for Education, Youth and Family Affairs – January 2023.
- Department for Education, Berlin Senate Department for Education, Youth and Family Affairs

– February 2023.

- Department of Labour and Vocational Education, Berlin Senate Department for Integration, Labour and Social Affairs – January 2023.
- Regional directorate Berlin-Brandenburg – January 2023.

Stuttgart

- Foreigners' Authority Stuttgart – January 2023.
- Department of Youth and Education Stuttgart – January 2023.
- Education Authority Stuttgart – January 2023.
- Department of Social Affairs and Integration – January 2023.
- Migration Department, Jobcenter – January 2023.

Uckermark

- Department II (District Social Welfare Office, Jobcenter Uckermark, District Youth Welfare Office, Integration Commissioner, District Public Health Office), District Administration Uckermark – January 2023.
- Foreigners' Authority of Uckermark – January 2023.
- Ministry of Education, Youth and Sport, Brandenburg – January 2023.
- District Department of Social Affairs, Uckermark, 16 December 2022.

Ireland

National level

- Irish Refugee Council – 23 January 2023.
- Cairde – 12 January 2023.

Dublin

- City of Dublin REALT – 16 February 2023.
- South Dublin County Council – 23 January 2023.
- Educate Together – 15 February 2023.

Dún Laoghaire-Rathdown (Dublin)

- Dún Laoghaire-Rathdown County Council – 27 January 2023.

Kerry

- Kerry Education and Training Board – 23 February 2023.
- Kerry HSE – 1 March 2023.

Italy

Naples

- Global Inequality and Migration Unit, ActionAid – 12 January 2023.
- Cidis Onlus – 9 March 2023.
- Representative of Campania region – 9 March 2023.

Rome

- Social Policy Department – 5 December 2022.

Poland

Katowice

- Katowice Labour Office – 26 January 2023.
- Education Department of Katowice municipal authority – 9 January 2023.

Lublin

- Strategy and Entrepreneurship Office of Lublin municipal authority – 13 January 2023.
- Education department of Lublin municipal authority – 7 February 2023.
- Initiatives and Social Programmes Department of Lublin municipal authority – 10 February 2023.
- Healthcare Department of Lublin municipal authority – 5 January 2023.

Warsaw

- Labour Office of Warsaw City Council – 4 January 2023.
- Education Office of Warsaw City Council – 5 January 2023.
- Healthcare Department of Warsaw City Council – 21 February 2023.
- Assistance and Social Projects Department of Warsaw City Council – 20 and 21 February 2023.

Romania

Bucharest

- Head of General Directorate for Social Assistance and Child Protection – 7 February 2023.
- School Inspectorate Bucharest – 8 February 2023.
- Bucharest Centre for Coordination and Management of the Intervention – multiple meetings between January and March 2023.

Constanța

- Centre for Management and Coordination of Intervention – 6 February 2023.
- Constanța County School Inspectorate – 15 February 2023.
- Public Health Department – 20 March 2023.

Slovakia

National level

- National Labour Inspectorate – 18 January 2023.
- Central Office of Labour, Social Affairs and Family – 26 January 2023.

Bratislava

- District Office of Labour, Social Affairs and Family – 20 January 2023.
- Mareena – 27 January 2023.
- Head of emergency room, Assistance Centre at Bottova St – 25 January 2023.

- Head of outpatient clinic for temporary protection holders from Ukraine at Rovniankova St – 23 January 2023 and 1 March 2023.
- Tenenet, Assistance Centre at Bottova St. – 13 and 27 January 2023
- Human Rights League – 23 January 2023.
- District Office – 27 January 2023.
- Centre for Educational Analysis – 19 January 2023.
- Head of Education Department, Old Town City Office – 20 January 2023.
- Head of Integration Department, City Office – 19 January 2023.

Nitra

- COMIN centre – 18 and 25 January 2023.
- District Office of Labour, Social Affairs and Family – 2 February 2023.
- Head of Education Department, City Office – 18 January 2023.
- Mareena – 24 January 2023.

Sweden

Gothenburg and Malmö

- Swedish Migration Agency – 27 January and 3 March 2023.

Gothenburg

- Västra Götaland Regional Council – 3 February 2023.
- Department for Assigned Housing – 12 December 2022.
- Department for Compulsory Education – 30 November 2022 and 7 February 2023.
- Department for Preschools – 23 February 2023.
- Department for Upper Secondary Education – 21 February 2023.

Malmö

- Scania Regional Council – 9 December 2022.
- Department of Labour Market and Social Welfare – 30 November and December 2022.
- Department for Preschools – 23 February 2023.

- Department for Upper Secondary Education – 8 March 2023.
- Swedish Employment Agency, local branch – 13 January 2023.
- Department for Compulsory Education – 30 November 2022.

Annex 3 – Respondents to online consultation

Table 2 – Respondents to online consultation

Location	Type of organisation	Area(s) of work
Bratislava	Municipality	Other (general assistance)
Bruges	School	Education
Bruges	Municipality	Housing, employment
Brussels (City)	Civil society organisation	Other (registration centre)
Brussels (City)	Municipality	All
Brussels (City)	Civil society organisation	Health
Brussels (Region)	Municipality	Housing
Bucharest	Civil society organisation	All
Czechia	Ministry of Labour and Social Affairs	Employment
Dublin	Civil society organisation	Education, employment, health
Dublin	Public service	Other (income support)
Dublin	Civil society organisation	Education, employment
Gothenburg	Civil society organisation	Education
Gothenburg	Civil society organisation	Education, employment
Gothenburg	University	Housing, education
Kerry	Public service	Other (children)
Lublin	Municipality	Education
Lublin	Municipality	Education
Malmö	Local authorities	Education
Nice	Civil society organisation	Other (social field)
Prague	Municipality	Health
Stuttgart	Civil society organisation	Housing
Stuttgart	Civil society organisation	Employment
Styria	Public service	Employment
Sweden (including Gothenburg and Malmö)	Civil society organisation	Housing, employment, health
Sweden south region (including Malmö)	Municipality	Other (social work)
Tallinn	Municipality	Education
Vienna	Civil society organisation	Housing, education, employment, health
Vienna	Public service	Housing, health
Warsaw	Municipality	Employment

Alternative text: Table 2 lists the different type of organisations with their specific areas of work that responded to the online consultation in the 17 locations covered by this report.

Annex 4 – National legal scope determining access to employment

Austria

Legal basis:

- Administrative decree of the Federal Ministry of Labour (2022-0.178.109, not published), regulating the granting of employment permits under facilitated conditions for people displaced from Ukraine, is no longer valid since the amendment to the AuslBG, Federal Law Gazette I No. 43/2023, on 21 April 2023. Since then, people displaced from Ukraine who have a temporary right of residence according to the Displaced Persons Ordinance and who have a displaced person's ID card are generally exempt from the scope of the AuslBG and can take up any employment without permit, that is, under the same conditions as Austrian nationals.

Self-employment: Yes

Vocational training: Yes

Belgium

Legal basis:

- According to the Royal Decree of 2 September 2018, beneficiaries of temporary protection are authorised to work on condition they are in possession of their residence permit or the document they receive while awaiting the delivery of their residence permit.
- According to the Royal Decree of 3 February 2003, beneficiaries of temporary protection do not need a professional card to be self-employed in Brussels or Flanders. They are, however, obliged to register at one of the accredited business counters.
- Law of 9 May 2018 on the occupation of foreign nationals in a special residence situation, in particular its Article 5.1, which entered into force on 24 December 2018
- Royal Decree of 2 September 2018 implementing the Law of 9 May 2018 on the occupation of foreign nationals in a special residence situation, in particular its Article 10 (6), added by Royal Decree 2022-03-29/05, Article 1, 005, which entered into force retroactively on 4 March 2022
- Royal Decree of 30 July 2022 amending the Royal Decree of 3 February 2003 exempting certain categories of foreigners from the obligation to hold a professional card in order to exercise a self-employed professional activity, which entered into force on 20 August 2022

Self-employment: Yes

Vocational training: Yes

Czechia

Legal basis:

- Act No. 221/2003 Coll. on Temporary Protection of Aliens
- Act No. 66/2022 Sb. on measures in the area of employment and social security relating to the armed conflict within the territory of Ukraine caused by an invasion of the army of the Russian Federation provides for rules on access to the labour market, for instance. It was approved through an accelerated procedure in March 2022, effective as of 21 March 2022, and in place for a limited term until 31 March 2024 (as amended by Act No. 198/2022 Sb., effective as of 30 June 2022, and Act No. 20/2023 Sb., effective as of 24 January 2023). The act was originally introduced for a term of one year and extended for an additional year.
- Act No. 67/2022 Sb. on measures in the area of education relating to the armed conflict within the territory of Ukraine caused by an invasion of the army of the Russian Federation regulates how individuals can document their education. It was approved through an accelerated procedure in March 2022, effective as of 21 March 2022 and in place for a limited term until 31 August 2024 (as amended by Act No. 199/2022 Sb., effective as of 30 June 2022, and Act No. 20/2023 Sb., effective as of 24 January 2023). The act was originally introduced for a term of one year and extended until 31 August 2024.
- Act No. 198/2009 Sb., the Anti-Discrimination Act, prohibits any discrimination on the basis of nationality. This act was adopted on 29 June 2009 and is effective as of 1 September 2009.
- Act No. 262/2006 Sb., the Labour Code, defines the principle of equal treatment concerning all third-country nationals lawfully residing and working in Czechia, and the principle of equal pay for equal work/work of equal value. This act was adopted on 7 June 2006 and is effective as of 1 January 2007.
- Act No. 435/2004 Sb., the Employment Act, provides rules on the labour offices, including the fact that all jobseekers can use their support. It was adopted on 27 July 2004 and is effective as of 1 October 2004.

Self-employment: Yes

Vocational training: Yes

Estonia

Legal basis:

- Protection Law

- Amendment Law of the Protection Law and the Aliens Act (Amendment Law)
- Government Regulation of 15 March 2022
- Aliens Act

Self-employment: Yes

Vocational training: Yes

France

Legal basis:

- Article L 5221-2 of the French Labour Code provides that beneficiaries of temporary protection are authorised to exercise a professional activity, as long as they have the documents and visas required by the international and national legislation in force.
- Article R581-4 (1 and 2) of the Code of entry and residence of foreigners and right to asylum stipulates that a beneficiary of temporary protection is granted a temporary residence permit, valid for six months (renewable).

Self-employment: Yes

Vocational training: Yes

Germany

Legal basis:

- Immigration Act of 5 August 2004 (BGBl. I S. 1950), effective as from 1 January 2005

Self-employment: Yes

Vocational training: Yes

Ireland

Legal basis:

- Terms of Employment (Information) Acts, 1994–2014 (entered into force on 16 May 1994)
- National Minimum Wage Act, 2000 (entered into force on 1 April 2000)
- Organisation of Working Time Act, 1997, covering a number of employment conditions, including maximum working hours, night work, annual leave and public holiday leave
- Maternity Protection Act, 1994 (entered into force on 19 October 1994)

- Safety, Health and Welfare at Work Act 2005 (as amended) replacing the provisions of the Safety, Health and Welfare Act 1989 (entered into force on 1 September 2005)
- Employment Equality Acts, 1998–2015, banning discrimination, including gender, civil status, family status, age, race, religion, disability, sexual orientation and membership of the Traveller community (entered into force in October 1999)
- Redundancy Payments Acts, 1967–2014, providing for minimum entitlements to a redundancy payment for employees who have a set period of service

Self-employment: Yes

Vocational training: Yes

Italy

Legal basis:

- Article 7 of the Ordinance of the Head of the Civil Protection Department No. 872 of 4 March 2022, regulating access to work for people coming from Ukraine as an exception to the regulations in force
- Legislative Decree No. 215 of 9 July 2003 implementing Directive 2000/43/EC on equal treatment between persons irrespective of racial or ethnic origin, published in Official Gazette No. 186 of 12 August 2003, in force from 27 August 2003
- Legislative Decree No. 216 of 9 July 2003 implementing Directive 2000/78/EC on equal treatment in employment and occupation, published in Official Gazette No. 187 of 13 August 2003, in force from 28 August 2003

Self-employment: Yes

Vocational training: Yes (access to 'vocational training or internships in enterprises for temporary protection holders refers to general access for all jobseekers, so there are no special channels or specific opportunities)

Poland

Legal basis:

- Act of 12 March2022 on assistance to Ukrainian citizens in connection with the armed conflict on the territory of this state
- Act of 13 June 2003 on granting protection to foreigners on the territory of the Republic of Poland
- Act of 20 April 2004 on the promotion of employment and labour market institutions, in force since 1 June 2004

- Act of 6 March 2018 – provisions introducing the Entrepreneurs Act and other acts concerning economic activity, in force since 30 April 2018
- Act of 6 March 2018 on the rules for the participation of foreign entrepreneurs and other foreign persons in economic transactions on the territory of the Republic of Poland, in force since 30 April 2018

Self-employment: Yes

Vocational training: Yes

Romania

Legal basis:

- Government Ordinance No. 25/2014 on the hiring and posting of foreigners in Romania, as well as for the amendment of certain legal enactments as regards the foreigners regime in Romania (GO 25/2014)
- Bilateral agreement between Romania and Ukraine on the mutual recognition and equivalence of education documents and academic degrees, signed in Bucharest, on 19 February 1999

Self-employment: Yes

Vocational training: Yes

Slovakia

Legal basis:

- Act on Certain Other Measures in Connection with the Situation in Ukraine, known as the Lex Ukraine, entered into force on 30 March 2022.

Self-employment: Yes

Vocational training: Yes

Sweden

Legal basis:

- Chapter 21, Section 7, of the Aliens Act states that a person who is granted a residence permit with temporary protection shall be granted a work permit valid for the entire period of temporary protection.

Self-employment: Yes

Vocational training: Yes

Acronyms and abbreviations

- **EU** - European Union
- **EUAA** - European Union Agency for Asylum
- **FRA** - European Union Agency for Fundamental Rights
- **the Charter** - Charter of Fundamental Rights of the European Union
- **TPD** - Temporary Protection Directive
- **UN** - United Nations
- **UNICEF** – United Nations Children's Fund

Endnotes

[1] Council Implementing Decision 2022/382, 4 March 2022.

[2] European Migration Network, Application of temporary protection, forthcoming (end of 2024).

[3] EUAA, Surveys of Arriving Migrants from Ukraine (SAM – UKR), Factsheet, 14 June 2022; 'Temporary protection for displaced persons from Ukraine'.

[4] United Nations High Commissioner for Refugees (UNHCR), Lives on Hold: Intentions and perspectives of internally displaced persons in Ukraine, UNHCR Ukraine, 2023.

[5] Eurofound and FRA, Barriers to Employment of Displaced Ukrainians, Eurofound research paper, Publications Office of the European Union, Luxembourg, 2023.

[6] See, for example, Directive 2013/33/EU, 26 June 2013; Council Directive 2003/109/EC of 25 November 2003; Council Directive 2009/50/EC, 25 May 2009; Directive 2008/115/EC, 16 December 2008.

[7] Austria, consultation with a representative of the Integration Centre Styria, 24 January 2023.

[8] Belgium, consultation with the coordinator of the Public Centre for Social Welfare (PCSW), Bruges, 23 January 2023.

[9] Sweden, Gothenburg, consultation with a representative of the Department for Assigned Housing, 12 December 2022.

[10] Belgium, Bruxelles Logement, 'Report of good practices based on the outcome of a conference of local actors' ('Recueil des bonnes pratiques de l'hébergement temporaire'), November 2022. Not published.

[11] Sweden, consultation with a representative of the Department for assigned housing, Gothenburg, 12 December 2022.

[12] Sweden, email response of the Unit for Assigned Housing, Department of Labour Market and Social Welfare, Malmö, 8 December 2022.

[13] Austria, consultation with the Vienna Social Fund, 24 January 2023.

[14] Austria, consultation with the Integration Centre Styria, 24 January 2023.

[15] Italy, interview with the two representatives of Cidis Onlus, 9 March 2023.

[16] Sweden, response from the Department for Assigned Housing, Gothenburg, 12 December 2022.

[17] Belgium, interview with Coordinator of the Brussels Capital Region, October 2022; Berlin Senate, 'Aktionsplan Ukraine in Berlin'.

[18] Austria, Civil Code, § 974.

[19] Belgium, interview with the coordinator of the PCSW, Bruges, 23 January 2023.

[20] Belgium, consultation with an assistant coordinator of the Ukraine team at the PCSW of Woluwe-Saint-Pierre, Brussels, 8 February 2023.

[21] Slovakia, interview with a representative of the COMIN centre, Nitra, 25 January 2023.

[22] Belgium, interview with the assistant coordinator of the Ukraine team at the PCSW of Woluwe-Saint-Pierre, 8 February 2023.

[23] Slovakia, consultation with a representative of the Human Rights League, 23 January 2023.

[24] Belgium, interviews with the PCSW President and coordinators of the City Council and the PCSW, Bruges, 10 January 2023.

[25] Belgium, interview with the coordinator of the City Council, Bruges, 27 January 2023.

[26] Germany, consultation with Department of Social Affairs and Integration, Stuttgart, January 2023.

[27] Germany, consultation with Department of Social Affairs and Integration, Stuttgart, January 2023.

[28] Germany, Berlin Senate Department for Integration, Labour and Social Affairs, reply to a written request, 19/12793, 22 August 2022, pp. 10–11.

[29] Poland, interview with the Assistance and Social Projects Department of Warsaw City Council, 21 February 2023.

[30] Austria, information provided by the Vienna Social Fund, 24 January 2023.

[31] Belgium, written explanation by a guide in diversity, Bruges, 2 February 2023.

[32] Czechia, interview with a municipal official from Trutnov who coordinated most municipally led initiatives concerning displaced persons from Ukraine, 17 February 2023.

[33] Estonia, response to information request, Saaremaa Municipality Government, 12 January 2023.

[34] Germany, interview with the District Department of Social Affairs, Uckermark, 16 December 2022.

[35] Slovakia, interview with a representative of Mareena, Bratislava, 27 January 2023; interview with a representative of the Human Rights League, Bratislava, 23 January 2023.

[36] Slovakia, interview with a representative of Mareena, Bratislava, 27 January 2023.

[37] Slovakia, interview with a representative of the COMIN centre, Nitra, 25 January 2023.

[38] Belgium, consultation with the coordinator at the Brussels Capital Region, Brussels, 31 January 2023.

[39] Ireland, consultation with a representative from South Dublin County Council, 23 January 2023.

[40] Sweden, information provided by the Department for Assigned Housing, Gothenburg, 12 December 2022.

[41] Belgium, interview with the President of the PCSW, 10 January 2023; interview with the coordinator of the PCSW, Bruges, 23 January 2023; interview with the coordinator at the City Council, Bruges, 27 January 2023.

[42] Belgium, interview with the coordinator at the Brussels Capital Region, Brussels, 31 January 2023.

[43] Estonia, interview with the head of the Department for Supporting the Integration of New Immigrants of Tallinn, Tallinn City Government, 17 January 2023.

[44] Estonia, consultation with Saaremaa Municipality Government, 12 January 2023

[45] France, interview with a representative of the French Association of Ukrainians of the Côte d'Azur, Alpes-Maritimes, 18 January 2023.

[46] Ireland, interview with a representative from Dún Laoghaire-Rathdown County Council, 27 January 2023.

[47] Slovakia, information provided by the head of the Integration Department of the City Office of Bratislava, 19 January 2023.

[48] Slovakia, information provided by a representative of the assistance centre at Bottova St, Bratislava, 13 January 2023.

[49] Slovakia, interview with a representative of Mareena, Nitra, 24 January 2023.

[50] Slovakia, interview with a representative of the COMIN centre, Nitra, 25 January 2023.

[51] Slovakia, interview with a representative of the Human Rights League, 23 January 2023; interview with a representative of Mareena, Nitra, 24 January 2023.

[52] Belgium, Bruxelles Logement, 'Report of good practices based on the outcome of a conference of local actors' ('Recueil des bonnes pratiques de l'hébergement temporaire'), November 2022. Not published.

[53] Internews, Barriers&Bridges, September 2022, Pp.31

[54] Romania, interview with the head of the General Directorate for Social Assistance and Child Protection, Bucharest, 7 February 2023.

[55] Slovakia, interview with a representative of Mareena, Bratislava, 27 January 2023.

[56] Slovakia, Act No 480/2002 Coll on asylum as amendedZákon č. 480/2002 Z.z. o azyle v znení neskorších predpisov, 20 June 2002.

[57] Slovakia, interview with a representative of Mareena, Nitra, 24 January 2023.

[58] Slovakia, interview with a representative of the Human Rights League, 23 January 2023; interview with a representative of the assistance centre at Bottova St, Bratislava, 13 January 2023.

[59] Slovakia, interview with a representative of the Human Rights League, 23 January 2023.

[60] Austria, information provided by the Vienna Social Fund, 24 January 2023.

[61] Austria, consultation with a member of the Integration Centre Styria on 24 January 2023.

[62] Belgium, interview with the coordinator of the PCSW, Bruges, 23 January 2023.

[63] Ireland, consultation with a representative from Educate Together, 15 February 2023.

[64] Italy, interview with the head of the Global Inequality and Migration Unit of ActionAid, Naples, 12 January 2023.

[65] Austria, email from the Vienna Social Fund, 24 January 2023.

[66] Germany, interview with a representative of the Berlin Senate Department for Integration, Labour and Social Affairs, January 2023.

[67] Ireland, interview with a representative of South Dublin County Council, 23 January 2023.

[68] Italy, interview with the head of the Social Policy Department of Rome, 5 December 2022.

[69] Poland, interview with a representative of the Assistance and Social Projects Department of Warsaw City Council, 20 February 2023.

[70] Slovakia, head of the Integration Department, City Office of Bratislava, 19 January 2023.

[71] Slovakia, representative of the District Office, Bratislava, 27 January 2023.

[72] Slovakia, interview with a representative of the COMIN centre, Nitra, 25 January 2023.

[73] Austria, information provided by the Vienna Social Fund, 24 January 2023.

[74] Belgium, interview with the assistant coordinator of the Ukraine team at the PCSW of Woluwe-Saint-Pierre, 8 February 2023.

[75] Poland, interview with the Assistance and Social Projects Office of Warsaw City Council, 20 February 2023.

[76] Slovakia, information provided by the head of the Integration Department, City Office of Bratislava, January 2023.

[77] Sweden, response from the Unit for Assigned Housing, Department of Labour Market and Social Welfare, Malmö, December 2022.

[78] Belgium, interview with the assistant coordinator of the Ukraine team at the PCSW of Woluwe-Saint-Pierre, 8 February 2023.

[79] Belgium, information provided by the national authorities when reviewing this report in July 2023.

[80] Belgium, interview with the coordinator of the PCSW, Bruges, 23 January 2023.

[81] France, interview with a representative of the association Equalis, Île-de-France, 27 January 2023.

[82] France, interview with a representative of the association France terre d’asile, Paris, 25 January 2023.

[83] Estonia, response to information request, Saaremaa Municipality Government, 12 January 2023.

[84] Germany, interview with a representative of the Department II of the District Administration, Uckermark, January 2023.

[85] Slovakia, information provided by the head of the Integration Department, City Office, Bratislava, 19 January 2023; interview with a representative of the COMIN centre, Nitra, 25 January 2023.

[86] Slovakia, interview with a representative of Mareena, Bratislava, 27 January 2023.

[87] Slovakia, interview with a representative of the COMIN centre, Nitra, 25 January 2023.

[88] Germany, information provided by the Department of Social Affairs and Integration, Stuttgart, January 2023.

[89] Belgium, Law promoting the integration of beneficiaries of the temporary protection status (Wet tot bevordering van de integratie van de begunstigden van het tijdelijk beschermingsstatuut), 18 May 2022; Flemish Government, executive decree granting a subsidy to local authorities for the construction of reception capacity for temporarily displaced persons from Ukraine, 26 December 2022.

[90] According to Art. 2 of the decree, among the defining characteristics of private accommodation are that it is situated in a reception location that is the principal, secondary or supplementary residence of a private person, or a building or mobile unit that an actor other than a local authority makes available and manages on its own initiative.

[91] Sweden, interview with the Swedish Migration Agency, 3 March 2023.

[92] Sweden, response from the Department of Labour Market and Social Welfare, Unit for Assigned Housing, Malmö, 8 December 2022.

[93] Slovakia, interview with a representative of the Centre for Educational Analysis, Bratislava, 19 January 2023.

[94] Slovakia, interview with the head of the Education Department, Old Town City Office, Bratislava, 20 January 2023.

[95] Poland, interview with the Education Office of Warsaw City Council, 5 January 2023.

[96] Poland, online interview with the Education Department of Lublin municipal authority, 7 February 2023.

[97] Based on the memorandum of understanding between the City of Bratislava and the United Nations Children's Fund as an emergency response to the situation with refugees from Ukraine; leaflet of the City Council of Bratislava, not available online.

[98] Italy, video interview with the head of the Global Inequality and Migration Unit, ActionAid, Naples, 12 January 2023.

[99] Czechia, video call with Prague Municipality, 25 January 2023.

[100] Belgium, written information provided by the Schools Service of the Brussels Government Centre for Expertise, Perspective, Brussels, 21 February 2023.

[101] Consultation with the Office of the Vice Mayor of Vienna and Executive City Councillor for Education, Youth,

Integration and Transparency via email on 31 January 2023.

[102] Estonia, response to information request, Education Department, Tallinn, 10 January 2023.

[103] Germany, Berlin Senate Department for Education, Youth and Family Affairs, consulted in February 2023; Süddeutsche Zeitung, 'In Berlin sind 79 ukrainische Lehrkräfte angestellt', 20 September 2022.

[104] Poland, Education Office, Warsaw City Council, 5 January 2023.

[105] Article 3 (3) of the TEU; Articles 7, 14, 24, 32 and 33 of the Charter. For example, see von der Leyen, Ursula, A Union that Strives for More: My agenda for Europe. Political guidelines of the European Commission 2019–2024, July 2019; European Commission, 'EU action on the rights of the child'; European Commission, 'The EU Strategy on the Rights of the Child and the European Child Guarantee'; European Parliament Resolution of 11 March 2021 on children's rights in view of the EU Strategy on the rights of the child (2021/2523(RSP)).

[106] Estonia, response to information request, Ministry of Education and Science, 30 January 2023.

[107] Slovakia, head of the Education Department, City Office, Nitra, 18 January 2023; interview with a representative of the COMIN centre, Nitra, 18 January 2023.

[108] Sweden, email, Department for Preschools, Malmö, 9 March 2023.

[109] Czechia, Prague Municipality, 20 and 25 January, 3 February and 23 March 2023.

[110] Ireland, consultation with a representative from City of Dublin REALT, 16 February 2023.

[111] Austria, interview with the head of the Department of Education and Integration, City of Graz, 12 January 2023.

[112] Slovakia, head of Education Department, Old Town City Office, Bratislava, 20 January 2023.

[113] Slovakia, Centre for Educational Analysis, Bratislava, 19 January 2023.

[114] Poland, interview with the Education Office of Warsaw City Council, 5 January 2023.

[115] Poland, consultations with Education Department of Katowice municipal authority, 9 January 2023, and Education department of Lublin municipal authority, 7 February 2023.

[116] Poland, interview with the Education Office of Warsaw City Council, 5 January 2023. See also FRA (2023), The Russian aggression against Ukraine – Displaced children finding protection in the EU – Bulletin 3, 29 September 2023; section 4.2 access to education.

[117] Poland, interview with the Education Office of Warsaw City Council, 5 January 2023.

[118] Belgium, consultation with the coordinator of the PCSW, Bruges, 23 January 2023.

[119] Estonia, response to information request, Education Department, Tallinn, 10 January 2023, Germany, Department for Education, Berlin Senate Department for Education, Youth and Family Affairs, January 2023 and education authorities, Stuttgart, January 2023.

[120] Czechia, video calls with Prague Municipality, 25 January and 3 February 2023.

[121] Austria, Office of the Vice Mayor of Vienna and Executive City Councillor for Education, Youth, Integration and Transparency, 31 January 2023.

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[180] Ireland, interview with a representative from Cairde, 12 January 2023.

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