



**Eurodiaconia**  *Connecting faith  
and social justice  
through action*

**RECEPTION AND INTEGRATION OF  
REFUGEES FROM UKRAINE:  
THE VOICE OF SOCIAL SERVICE PROVIDERS**

**Eurodiaconia** is a European network of churches and Christian NGOs providing social and healthcare services and advocating social justice.

## Mission

Eurodiaconia is a network of churches and Christian organizations that provide social and health care services and advocate for social justice. Together we work for just and transformative social change across Europe, leaving no-one behind.

## Vision

Driven by our Christian faith, our vision is of a Europe where each person is valued for their inherent God-given worth and dignity and where our societies guarantee social justice for all people, including the most vulnerable and marginalized.

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# INTRODUCTION



Eurodiaconia is a European network of churches and Christian NGOs providing social and healthcare services and advocating social justice. Together our membership represents the needs and unique experiences of 58 national and regional organisations in 32 countries. This report summarises the efforts of Eurodiaconia members to respond to the humanitarian and integration challenges faced by displaced Ukrainians and lays out the key elements required from EU and national policymakers to facilitate this integration within the framework of the Temporary Protection Directive (TPD).

Eurodiaconia members have a long history of engagement in migrant and refugee integration services, from providing accommodation to asylum seekers, support to access education, the labour market, and housing, and provision of psychosocial assistance to traumatised refugees. They work with children, youth, adults, and elderly people, and with those facing complex barriers to integration, including people with disabilities, unaccompanied minors, and victims of human trafficking.

Our members provided input and recommendations for this report from February to October 2022. They comprise countries bordering Ukraine and in other parts of Europe and are diverse in their organisational size and types of service provision. This report outlines their perspectives on the current state of play on integration of Ukrainian refugees, the challenges they are currently confronting and those they foresee in the coming period, and best practice examples. Drawing on this knowledge, we suggest lessons that can already be drawn from the last year, and recommendations for EU and national level policy makers to better support the long-term integration needs of refugees in Europe, both in the context of the war in Ukraine and beyond.

# 1. HUMANITARIAN RESPONSE

The immediate needs faced by refugees coming from Ukraine to Europe continue to be safeguarding and prevention of trafficking, provision of food and necessities, and assistance to register and navigate administrative processes.

Eurodiaconia members responded to the influx of refugees into the EU by mobilising staff and volunteers to provide humanitarian aid at border crossings and train stations, coordinating accommodation, providing food and medical aid, and working with local authorities to deal with more complex cases, for example, unaccompanied minors and people with disabilities.

Our members are concerned about the risk of human trafficking faced by Ukrainian refugees. Several members are engaged in training volunteers, police, and other front-line responders to recognise and respond to signs of trafficking. Many Ukrainians are crossing the border through private transportation, and some of our members are providing transportation across the border.

However, there remains a concern that this reliance on private actors could allow for traffickers to pick up Ukrainian refugees. In many countries, entry points such as railway stations were quickly recognised as hotspots for traffickers and governments adapted to alert newcomers to the risk of trafficking through leaflets and making official volunteers becoming easier to identify.

However, our members remain concerned about trafficking, especially of women, who make up the majority of refugees from Ukraine, into labour and sexual exploitation. This concern would be mitigated by the full and complete implementation of the TPD, particularly the right to access employment and social benefits. This would help to reduce the risks often associated with being trafficked or exploited or working in the informal labour market, including not being able to speak the local language, being desperate for a job, and not having a local support network or knowledge of local labour laws.

Eurodiaconia is concerned about Member States' ability to adequately fulfil these rights for the high number of refugees, which arrived in a short time frame, especially given the already stressed social protection systems in Member States. Indeed, our members from several countries have reported that the elements of providing access to housing, employment, and social benefits under the TPD are not being adequately fulfilled.



Many of the grassroots organisations who have provided accommodation, food, and other necessities in the immediate and mid-term are limited in the resources and capacity they have and have faced difficulty receiving financial assistance by national or local government. The continuity of the work of small and medium- sized NGOs and grassroots organisations must be ensured through investment on the national and regional level and a strong understanding of the diversity of stakeholders that are needed to adequately respond to a crisis on this scale.

This is especially important because national governments have expressed a need to disperse Ukrainian refugees throughout more rural areas of the country to decrease the pressure on large urban centres. There is an important role for small service providers and communities to assist in social integration and provide material support for Ukrainian refugees who would like to relocate outside major urban areas but require support to do so. Eurodiaconia members also play a vital role to bolster the services provided by governmental social service providers, as they are often underfunded with limited capacity to meet the needs of such a large number of refugees.



*Photo by Yulia Dobrinina, 2022*

## 2. TEMPORARY PROTECTION

The EU's triggering of the Temporary Protection Directive served as the enabling framework for Eurodiaconia members to assist in fulfilling the rights that displaced Ukrainians are entitled to. **While we welcome the adoption of the Directive, there remain barriers to accessing these rights, including the varied implementation of the Directive in different Member States.**

Despite the adoption of the TPD, in many countries refugees still struggle to get information about their rights and how to access them and face administrative barriers in registering and receiving assistance. In Nordic countries, including Finland, Ukrainian refugees face long waiting times to get a national registration number which is needed to get a job. In Germany, for example, our members note that refugees need to fill out many documents in German, paperwork that varies in each locality. The refugees are then very dependent on their hosts or other volunteers' assistance to translate the German forms.

There is a noted lack of Ukrainian translators in many countries where our members work. Our members have also shared with us that many refugees have not registered, due to an unfounded fear of not being able to move to another EU country after receiving temporary protection in an EU country, or a belief that the war will end soon, and they will return to Ukraine. This shows that clarification of rights and clear access to information on these rights under the TPD are needed.

Furthermore, several of our members report that access to social welfare assistance is not a right given to recipients of temporary protection in their country. Our member in the Czech Republic, Diaconia of the Evangelical Church of Czech Brethren (ECCB), reports that Ukrainians who register for temporary protection are only eligible to receive a monthly sum that is lower than what Czech citizens would receive for unemployment benefits.

### 2.1 Accommodation

The immediacy of the humanitarian crisis has already given way to the long-term needs of Ukrainian refugees. Our members perceive the primary long term needs to include accommodation, assistance to access employment, education, psychological support, and services for those with disabilities and others with special needs. Underpinning these long-term needs is the ever-present need for adequate and sustainable funding for civil society. The need for long-term accommodation is evident as the war in Ukraine continues and the number of refugees from Ukraine grows. A significant number of Ukrainian refugees have been hosted by volunteers in temporary accommodation. While eager to help at first, many volunteers have become burdened by

the financial and emotional costs included in providing accommodation and assistance to refugees. Our members recognise the importance of creating sustainable systems of accommodation and regret their government's reluctance to invest in longer term accommodation solutions. Our member in Greece, Perichoresis<sup>1</sup>, reports that because short-term accommodation needs have been fulfilled by NGOs and residents who host refugees, the ministry of housing is not receptive to their calls to make long-term accommodation available. Diaconia ECCB<sup>2</sup> in the Czech Republic appeals to their national authorities to provide more sustainable solutions, as the ability for private hosts to accommodate refugees is no longer tenable and in some cases is forcing refugees back to Ukraine.

The influx of refugees has highlighted many countries' low stock of social housing. Even before the start of the war, this was a key issue of concern within our network. There is now concern for both the rising number of refugees who require accommodation and residents who were on long waiting lists who may now face even greater difficulty in accessible affordable accommodation. Increasing the availability of quality social housing is essential in the long term to meet the needs of both groups. Ending homelessness and inadequate housing goes hand in hand with creating pathways for integration for all refugees.

This problem could temporarily be alleviated by making payments to host families and volunteers. However, in Poland, our member Diakonia Kosciola Ewangelicko-Augsburskiego (Diakonia Poland) reports that the government halted their reimbursement for hosts of refugees in June, leaving many hosts unable to continue without financial support, especially with rising cost-of-living prices. Our members are also concerned about safeguarding related to volunteering and host families and about the lack of experience of volunteers. They are struggling to support refugees whilst also supporting volunteers who have limited training or experience with people who have experienced the trauma of war and displacement.

***“The main challenge right now is for the State to facilitate access to sustainable accommodation, as most displaced persons from Ukraine are hosted by citizens. After many months, this setting can create some tension, especially since many of the hosting families did not expect that they would host people for so long.”***

***Claire Cabrol, NGO Platform Coordinator for the reception of refugees, Fédération de l'Entraide Protestante (FEP)***

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<sup>1</sup> [Perichoresis NGO – Embracing the Spirit of Inclusion](#)

<sup>2</sup> <https://www.diakonie.cz/en/>



## 2.2 Employment

One of our Romanian members, Fundatia Filantropia Timisoara<sup>3</sup>, reports that Ukrainian refugees have started language classes and are looking for work. As most refugees are women and children, our members report a mismatch in what jobs are available. For example, there is a need in many countries for workers in construction and trades, professions that are not often taken up by women. Furthermore, as many women are mothers of young children, they need childcare to be able to work. However, many European countries already face a shortage in childcare, and therefore, this is another pressing concern to be addressed for the benefit of everyone.

Language and slow or unclear avenues to recognition of qualifications also presents a significant barrier in accessing employment. Our members in Sweden and the Czech Republic both shared that the social welfare that Ukrainian refugees are entitled to is very low which will necessitate them to find work quickly, a difficult task for those without sufficient knowledge of the local language.

There are also not enough language classes, a gap that NGOs including our members have helped to fill. Finally, even for those able and willing to work, getting certifications or finding a job can be difficult. In many countries, there is no targeted employment support for refugees, and they are forced to navigate the Public Employment Services on their own. Our members play a crucial role in helping individuals navigate the local job market. Many run job counselling services, run social enterprises, and partner with private companies to match migrants and refugees seeking work with.

## 2.3 Psychological support and support for vulnerable groups

A concern emphasised by many of our members is the psychological needs of refugees and volunteers. Our member Deaconess Foundation<sup>4</sup>, which has a programme dedicated to providing psychological care for survivors of war trauma and torture and are highly specialised in this area, emphasise the need for quick and long-term access to therapy.

These services also need to be tailored to specific groups, such as children, and account for the ongoing trauma many are facing, as they communicate with loved ones back in Ukraine and face an uncertain future. The provision of psychological care to volunteers who may experience compassion fatigue or secondary- post traumatic stress disorder due to their proximity to those living with trauma should also not be overlooked. Many of our members also report that volunteers are overworked and

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<sup>3</sup> [Homepage - Fundația Filantropia Timișoara \(fft.ro\)](http://www.fft.ro)

<sup>4</sup> <https://www.hdl.fi/en/>

facing burn-out. Repeated exposure to the trauma of the people they are assisting as well as prolonged co-living situations where hosts must navigate sharing close living space with Ukrainian refugees can result in strain on their mental health.

Our members have identified people with Roma background as a particularly vulnerable group, as they have been denied accommodation by hosts in some countries and disproportionately fall through the gaps in the reception system due to widespread antigypsyism. In a major refugee reception centre in Warsaw, for example, many Roma women and children have been living since February, with no long-term accommodation solution proposed by local authorities. A significant number of Roma people are also stateless<sup>5</sup> or hold dual Ukrainian-Hungarian citizenship and thus face difficulty accessing temporary protection.

Identification of people with disabilities or other needs is another concern, due in part to the relatively simple process of registering in most countries. This simplified process in some countries, while facilitating swift registration, makes it easy for people to fall in the cracks and not receive the assistance and specialised services they need.

Our member in Romania, Federatia Filantropia Timisoara, was asked by municipal authorities to receive and accommodate for groups of people with special needs, including the elderly, people with disabilities, and children coming from institutional care. Because the organisation already has facilities and expertise to deal with the specialised needs of these groups, they are able and willing to do so, but the lack of funding by municipal authorities provides a challenge to the long-term ability of their organisation to respond to this need.

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<sup>5</sup> [4616 file1 roma-belong-ukraine-english-language.pdf \(errc.org\)](#)

## 3. TAKING STOCK OF LESSONS LEARNED

### AND THE FUTURE OF INTEGRATION POLICIES

Taking stock of lessons learned in times of crisis is crucial for building more resilient policies, systems, and communities. Several themes emerged in feedback provided by Eurodiaconia members on the prevailing needs in refugee integration, as well as lessons to integrate into migration policy more widely. These include the importance of cultivating strong relationships between service providers and local authorities to facilitate the integration of migrants and refugees with a multi-stakeholder response, sustainable funding for service providers and NGOs facilitating reception and integration, and the role of the Temporary Protection Directive for future refugee crises.

#### 3.1 Multi-stakeholder coordination

The coordination of reception and integration of refugees is an ongoing matter that requires the continued attention of EU institutions and national level governments. According to our members, the coordination of stakeholders can often be problematic. Our member the Church of Sweden<sup>6</sup> notes that they have received an unusually high number of invitations to coordination meetings from different government authorities and other actors and that it is quite time consuming for them to attend all these meetings. In this case, it has been identified as a problem and a government authority has mentioned that they will investigate this concern and try to solve it.

Our member in Poland shared with us that there is no existing model to coordinate the reception and integration of refugees, and that there needs to be clear establishment of roles, responsibilities, and capacity building. The coordination of different actors engaged in receiving refugees, particularly ministries related to housing, labour, education, health, and asylum, needs to be centralised, with clear contact points for service providers to be able to liaise with.

One best practice example conducted by Diakonia Poland in partnership with Diakonie Katastrophenhilfe involved cash payments to Ukrainian refugees in three different areas in Poland. These cash payments afforded a level of dignity to Ukrainians fleeing the war, who were able to spend the money on items they needed, whether it was cell phone service, accommodation, food, or medicine. This project was unable to be sustained for long due to lack of funding but filled a vital gap in Polish refugee reception.

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<sup>6</sup> [English \(engelska\) - Svenska kyrkan](#)

Poland and many other EU countries do not offer additional monetary assistance to refugees, beyond the social welfare available to all Polish citizens that requires an application process. Bridging the gap between the time of first arrival

and the receipt of social welfare, as well as the inadequacy of social welfare allowance, cash payments are a necessary but often overlooked need for recipients of Temporary Protection. Recipients of the cash assistance programme in Poland reported that they spent the money on food, winter clothing, phone credit, security deposits for renting an apartment, and rent.

As mentioned previously, coordination between different stakeholders was essential to meeting the needs of refugees from Ukraine, particularly in the early days of the outbreak of the war. Several of our members mentioned that they had experience working with local authorities in high-pressure situations, for example during the 2015 refugee reception crisis. This experience allowed them to respond quickly and effectively to respond to the gaps in the government's response. Moving forward, coordination and emergency plans for reception and integration of large numbers of refugees should be formally established at national and municipal levels. Furthermore, working relationships between civil society actors and volunteer organisations should be formalised to respond quickly and effectively to emergency situations.

Taking advantage of this positive mobilisation, governments have continued to disproportionately rely on NGOs to provide services and assistance without receiving sufficient support to do so. Even when NGOs have called on their governments and responsible ministries to provide long-term accommodation solutions, they have not received positive responses.

It is crucial for Member States to take greater responsibility for the provision of services and to formalise their relationship with NGOs and respond to their needs with concrete action and funding. As during the early days of the COVID crisis, recognition of essential service providers is not sufficient. The provision of funds, infrastructure, and responsiveness of various governmental ministries is necessary.

## Best practice example

Our member Fédération de l'Entraide Protestante (FEP)<sup>7</sup> in France created a platform of four nationally active NGOs with the aim to conduct a small study taking place in areas of high concentration of Ukrainian refugees in France. The purpose of the research is to assess the implementation and success of the national mechanism to see what worked and what did not. Within the context of this research, they will also research citizen mobilisation within the national mechanism that guided the response to the influx of Ukrainian refugees and how NGOs shared resources and worked together.



<sup>7</sup> [Accueil - FEP - Fédération de l'Entraide Protestante | Vers de nouvelles fraternités](#)

## 3.2 Taking forward temporary protection

The primary difference between the refugee flows into the EU in 2015 and the current movement of Ukrainian refugees into the EU is the availability of temporary protection and the tension between Member States on the distribution of refugees with significant pressure on countries of first entry. One of the successes of the temporary protection directive is the ability of individuals to move freely between EU Member States, thereby relieving pressure on countries of first entry. This clear success provides a real-life example of mandatory solidarity that could be replicated in the New Migration Pact.

Under the Temporary Protection Directive, refugees coming from Ukraine are entitled to social benefits, education, access to the labour market, and access to healthcare. While the timely adoption of the Directive was a step in the right direction, there remain gaps in the interpretation of the scope of the directive and many of these rights are being realised not through government assistance, but through NGOs, including Eurodiaconia members.

The sustainability of NGOs who are often funded through donations and project funding must be ensured through adequate funding by national and local government and facilitated further through EU funding. Furthermore, there must be greater clarity on the responsibilities of Member States and rights of refugees under the TPD.

The adoption of the Temporary Protection Directive has been widely hailed as a success, as it has allowed for a great number of Ukrainian refugees to integrate into life in Europe with minimal administrative burden in a short amount of time. Whilst the success of the TPD is clear, our members have also witnessed the fallout of the unequal rights given to Ukrainian refugees and refugees from other countries. Similarly, the status of refugees coming from Ukraine, but of different nationality, to the EU remains a matter of concern to our members, as they are currently not covered by the TPD.

***“But this determination and drive for solidarity is still missing in our migration debate. Our actions towards Ukrainian refugees must not be an exception. They can be our blueprint for going forward.”***

***2022 State of the European Union address by European Commission President Ursula von der Leyen***



Another emerging issue related to the Temporary Protection Directive is the role of the Solidarity Platform, put in place to monitor the implementation of the Directive. While the platform plays an important role for Member States to coordinate and share best practices, we are concerned that the voluntary participation of Member States on the Platform and the lack of independent monitoring has overlooked human rights abuses, including the unequal treatment of Roma and other ethnic minority groups in accessing their rights under the TPD, segregation in reception centres, and unequal access to services.

In order to curtail instances of discrimination, which have already been reported, the Solidarity Platform should be authorised to put in place structured monitoring mechanisms, consult other stakeholders including NGOs to uncover instances of discrimination and failure to implement the TPD. These multi-stakeholder reports should then be used to communicate gaps in implementation and fundamental rights abuses to the EU institutions for further action.

### **3.3 Two-tiered approach**

Beyond the scope of the war in Ukraine, refugees from countries like Afghanistan and Syria have had to give up their space at asylum centres and face long waiting times, creating tension and the feeling of unfairness. The immediacy of the war in Ukraine has also drawn attention away from other crises, including the refugees at the Belarus/Poland border, where pushbacks have been legalised under Polish legislation in direct

***“Germany and, in particular, Berlin have been doing a good job with integration measures – the outrageous thing is that other refugees, for example, many from Afghanistan and Syria, do not receive the same opportunities.”***

***Petra Schwaiger, Policy Officer on Migration, Diakonie Berlin-Brandenburg***

opposition to EU and international law. Our member in Poland, Diakonia Poland<sup>8</sup>, reports that refugees who came from the Belarus border are in closed centres and do not have adequate access to services, healthcare, and basic supplies while Ukrainian refugees are provided accommodation, can move freely, and for the most part, have access to all services and necessities. While some would argue that the use of the TPD in the situation of Ukraine is different from others due to Ukraine's proximity to Europe and the unprecedented scale of the number of refugees, Eurodiaconia believes that this division sets a dangerous precedent, creating different levels of human rights that are afforded to some and denied to others.

***“We jumped from one refugee crisis to another. Since last summer, we have had the crisis at the border between Belarus and Poland. People were dying in the forest and were pushed back when they tried to cross the border. We did our best to provide help through the chaplains at the army border guard and Commissioner for Human Rights in Poland, the constitutional authority for legal control and protection, the only civil institution authorised to enter the border area.***

***In general, NGOs and journalists were not allowed there. You look at the comparison of treatment of people who are still stuck on border or at closed centres compared to Ukrainian refugees now. Attention is now diverted to Ukrainian refugees, both in terms of reactions from individuals and the State.”***

***Iwona Baraniec, Senior Project Officer, Diakonia Poland***

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<sup>8</sup> [Diakonia Polska](#)

### 3.4 Looking ahead

Our members are anticipating new challenges to arise in the coming winter months with rising energy and gas prices, inflation, and the continuation of the Russian war against Ukraine. A new wave of displaced Ukrainians is anticipated, and numbers of refugees from other countries, including Afghanistan, is growing. Concern is growing over increasing poverty due to growing costs of energy, housing, and food. Our member in Berlin reports dramatic increases in the number of people at food banks. These interlinking crises require urgent policy solutions that put the well-being of people, not profit, at the centre.

These upcoming challenges require integration policies that are flexible, yet structured and grounded in evidence-based policies. However, we remain concerned that the EU and Member States remain more concerned with immediate humanitarian response over funding and policy responses to long-term integration. We urge the European Institutions to respond to the growing cost of living and accommodation crisis, with a view to the specific needs of displaced Ukrainians.



## 4. FUNDING INTEGRATION

The EU has taken several positive steps to ensure flexible funding is available to address immediate and medium-term needs in response to the effects of the Russian war against Ukraine, including through REACT-EU, CARE, and the Home Affairs fund. However, only 1 billion euros from the CARE package have been committed so far by Member States, and none or very little of these funds have reached civil society organizations. It appears that there is still an unclear long-term strategy, and service providers working on the ground keenly feel this lack of sustainable funding. There is a need for more transparent financing mechanisms, definite programming cycles, and the participation of CSOs in the preparation, execution, monitoring, and assessment of the EU budget. The involvement of CSOs is necessary to ensure the longevity of programmes and to anchor them at the local level.

On the 7<sup>th</sup> of June 2022, for the 2023 annual budget, the European Commission proposed €1.6 billion for migration-related spending, of which €1.4 billion was earmarked to support migrants and asylum-seekers. Whilst this is a positive development, additional funding is required, and the existing EU funds should be used to give migrants and refugees equal access to mainstream services. This should be done in accordance with previous guidelines on the use of EU funds for the inclusion of migrants and refugees, to prevent creating a tiered system where refugees from Ukraine receive better or faster access to services. The EU must also ensure that resources are not diverted from other equally important social priorities, including measures to combat poverty and homelessness, and increasing access to the labour market and education.

Eurodiaconia calls on the European Commission to implement a clear path of distribution for FAST-CARE, which adds flexibility to the use of cohesion funds and asks that they ensure that these regulations are respected by Member States and that they reach the designated parties. Our members report concern that despite increased flexibility on the use of funds, Member States will "gold-plate" the use of these funds, or create unreasonable criteria needed to access the funds for organisations that are already providing essential services.



Although the EU is reporting a quick mobilisation of funds, the need for funding by NGOs in Member States has only increased and there remains a lack of transparency on how civil society can access this funding. Our member in The Czech Republic, Diaconia ECCB, reports that funding that was initially planned to be provided for the duration of 2023 has now been cut. This will affect centres that provide afterschool programmes for students, counselling, and assistance to access the labour market that adapted their services to provide additional services for Ukrainian refugees whilst continuing to serve local communities. Especially for countries like the Czech Republic that do not have as much expertise on integration, NGOs are a key actor in facilitating long-term integration services and should receive the funding necessary to do so.



Photo by Yulia Dobrinina, 2022

## 5. RECOMMENDATIONS

The below recommendations were elaborated based on consultations with our members working in varied geographical contexts throughout Europe, including countries bordering Ukraine such as Poland, Romania, and Slovakia. Several common priorities regarding actions on both EU level and national level exist amongst Eurodiaconia members, with particular importance to be given to the interaction of these levels in ensuring strong policy and practical solutions to the integration of migrants.

Our members, as NGOs, see their role as social service providers for migrants and refugees to be essential to fill in the gaps of the needs of migrants and refugees not addressed by public authorities. Indeed, their work has proved essential to responding the extraordinary need that has arisen in the past few months. Therefore, the following recommendations include both the needs of migrants and refugees and the elements facilitating this integration through the work of volunteers, NGOs, and social service providers.

### 5.1 EU level recommendations

#### **Establishing and accessing rights under the TPD**

- The Solidarity Platform should be utilised to monitor the implementation of the Temporary Protection Directive
  - The Solidarity Platform should formalise the involvement and input by civil society on the implementation of the TPD, both from national and EU level;
  - The Solidarity Platform should follow-up on the implementation of the plan to address the risks for trafficking in human beings for people fleeing the war in Ukraine, paying particular attention to preventing and identifying instances of labour trafficking;
  - The Solidarity Platform should be utilised to ensure that rights under the TPD are respected and covered by national governments, however this should be supplemented by putting in place more stringent monitoring mechanisms, with particular concern for equal treatment of refugees, including those from Roma or other ethnic and national backgrounds;
  - The Solidarity Platform should be utilised to build capacity of Member States to respond to the long-term needs of integration of migrants by sharing best practices and utilising the expertise of civil society and other stakeholders;



- The European Commission should clarify the rights and responsibilities under the TPD in order to create coherent implementation of the TPD amongst Member States, with particular concern for the right to social welfare and access to the labour market.

### **Facilitating integration**

- The European Commission should establish recommendations and guidance on the recognition of skills and qualifications of Ukrainian refugees and establish a skills and needs matching platform;
- The Safe Homes Initiative, or another appropriate mechanism, should shift focus from temporary hosting housing to sustainable long-term housing solutions and put forward specific, practical guidance for member states to increase housing stock whilst ensuring safeguarding for Ukrainian refugees who remain with hosts, and guidelines for financial and practical support for hosts;
- The European Commission should encourage Member States to fully implement the Integration and Inclusion Action Plan to adequately respond to the needs of current and future migrants and refugees.

### **Preventing a two-tiered system**

- The European institutions should clarify that non-Ukrainian refugees should not be given lower priority in access to services and accommodation and should address current situations where non-Ukrainian asylum seekers are denied accommodation, leading to situations of sleeping rough and deprivation of basic human rights;
- The EU institutions should respond to instances of deprivation of rights of refugees from countries other than Ukraine and should not create a two-tier system of refugees, and should respond to the legalised pushbacks, arbitrary detention, criminalisation of humanitarian assistance, and violence against refugees at European borders by initiating infringement proceedings and further investigating and addressing the role of Frontex and other actors in human rights abuses.

## Funding

- The European Commission should encourage member states to invest in resilient social systems by encouraging investment in social housing stock, public employment services, education, social enterprises, and social services and to allocate a portion of ESF+ funding to achieve this;
- The European Commission should make funding available beyond funds previously allocated under ESF and other funding mechanisms for refugee integration to ensure that other vulnerable groups are not de-prioritised;
- The European Commission should implement a clear path of distribution of FAST-CARE funds and ensure that these regulations are respected by Member States and that they reach the designated parties;
- The European Commission should implement more transparent financing mechanisms, definite programming cycles, and the participation of Civil Society Organizations (CSOs) in the preparation, execution, monitoring, and assessment of the EU budget;
- The European Commission should clarify how the transnational calls for proposals under AMIF will be redistributed and re-programmed to mitigate the lack of calls for the last two years.



*Photo by Yulia Dobrinina, 2022*

## 5.2 National level recommendations

### Establishing and accessing rights

- Member States should ensure that the rights under the TPD are respected and fully implemented;
  - Member States should lower administrative barriers, where possible, including by translating documents to Ukrainian and Russian and utilising digital solutions, and should provide clarity on the rights given under the Temporary Protection Directive, the benefits of registering to receive temporary protection, and the ability of recipients of temporary protection to return to Ukraine and maintain their status or to move another Member State and receive temporary protection in that Member State;
  - Member States should consider the rights under the TPD as minimum standards and allow for more generous allowances, particularly regarding the right to receive social welfare, which some EU countries have interpreted in a way that limits the monthly allowance of Ukrainian refugees to a lower amount than the amount received by residents.
- Member States should make every effort to identify and safeguard vulnerable groups;
  - Member States should ensure that registration for temporary protection includes identification of certain vulnerabilities, including disabilities and UAMs, by training professionals tasked with registration to detect these vulnerabilities and referral to appropriate services;
  - Member States should safeguard vulnerable groups, including women and children, who are being housed by volunteers, by providing gender- sensitive accommodation, running security checks on hosts and implementing a clear system for identifying, referring, recording, and reporting instances of harm;
  - Member States should provide targeted support for people from Roma ethnic background and those at risk of experiencing any form of discrimination in accessing accommodation and services;
  - To prevent situations of trafficking, front-line professionals should be trained to recognise and respond to potential situations of trafficking and ensure the full realisation of the rights laid out in the TPD, particularly to access employment, accommodation, and social welfare.

## **Facilitating integration**

- Member States should not create double standard between the treatment of refugees from Ukraine and refugees from elsewhere by providing the same standard of care and services for all;
- Volunteers should be supported through provision of psychological care for them, and through availability of reliable information and resources, for example in the form of a helpline;
- Avenues should be created for NGOs, social service providers, and grassroots organisations to provide feedback about Ukrainian refugees and actively participate in the development and implementation of policy;
- Social benefits should be adequate to live and at the same level of residents to prevent situations of trafficking or exploitative work before they have the chance to integrate, learn the local language, and enter the formal labour market;
- Early skills assessment, language classes, vocational training, cultural orientation, and targeted support to enter the labour market should be provided as early as possible.

## **Funding**

- Information on budget availabilities and re-programming should be made publicly available and transparent, including the timeline, process of applying, and qualifications to access funding;
- EU funding should be allocated to NGOs and grassroots organisations who are already active and providing services on the ground delivering front-line support, humanitarian aid, and long-term integration assistance to refugees and migrants;
- Financial reimbursement should be provided to volunteers and hosts providing accommodation to refugees to ensure sustainability of support for refugees and prevent a further crisis of lack of accommodation and housing;
- ESF+ funds should not be re-allocated to Ukrainian refugees, instead, new funding streams should be provided for Ukrainian refugees to prevent the loss of funding for other vulnerable groups;
- Funding to assist Ukrainian refugees to enter the labour market should include funding for social enterprises and assistance to access the labour market for mothers of young children and groups who have difficulty accessing the labour market, including youth, those with low levels of skills or education, people with disabilities, and people who encounter discrimination on the labour market, including Roma people.





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