

INCREASED RISKS OF HOMELESSNESS FOR PEOPLE FLEEING UKRAINE AMID EXTENSION OF TEMPORARY PROTECTION AND RESTRICTIVE NATIONAL TRENDS



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Key messages

- The EU continues to show support for people fleeing Ukraine through an additional extension of the Temporary Protection Directive until **March 2026**.
- More than four million people fleeing Ukraine who have settled in EU countries following the Russian invasion are concerned by this extension (as of October 2024, 98.3% were Ukrainian; non-EU citizens under Temporary Protection came mainly from Russia (12,294; 0.3%), Nigeria (4,982; 0.1%) and Azerbaijan (4,214; 0.1%)).
- In an opposite trend, across 2023 and 2024, European countries moved to restrictive policies and reductions in support for those under Temporary Protection (or under other schemes of support). Changes in this sense were introduced in national legislation by at least 12 countries: **Czech Republic, Hungary, Poland, Lithuania, Greece, Romania, Ireland, Belgium, France, Netherlands, Norway, and the UK**.
- **Homelessness** among beneficiaries of Temporary Protection has been reported in at least six of the countries mentioned above (Czech Republic, Hungary, Poland, Germany, the UK - England and Scotland), with further increased risks of homelessness.
- The **Temporary Protection Directive implementation varies widely across Member States**, and support for access to accommodation and housing has become uneven.
- **Safe Homes initiative status is currently uncertain** and no additional support with accommodation and housing was announced by the European Commission.

Introduction

*EU Member States are required to offer **material support, which includes housing**, as part of their obligations under the Temporary Protection Directive. This can take the form of state-provided housing, NGO-supported arrangements, or private initiatives coordinated by governments. The **right to housing exists for the entire duration of the Temporary Protection**, which is initially set for one year but may be extended depending on the situation.*

On the 25th of June 2024, the Council of the EU extended the Temporary Protection Directive (TPD) for people fleeing Ukraine until March 2026.¹ This extension concerns more than four million individuals who have settled in EU countries following the Russian invasion. Of the people who fled Ukraine and were under Temporary Protection (TP) in the EU at the end of October 2024, 98.3% were Ukrainian. Among other non-EU citizens under TP, the main countries of citizenship were Russia (12,294; 0.3%), Nigeria (4,982; 0.1%) and Azerbaijan (4,214; 0.1%).² The renewal of the TP concerns the same categories of persons as in the March 2022 Council decision triggering the Temporary Protection Directive (TPD), respectively: 'Ukrainian nationals and their family members, non-Ukrainian nationals and stateless persons benefiting from international protection in Ukraine (e.g. refugees and beneficiaries of subsidiary protection) and their family members, non-Ukrainian nationals with a permanent residence permit who cannot return to their country of origin in safe and durable conditions' (adequate national protection can also apply).³ TP may also apply to 'Ukrainian nationals who fled Ukraine not long before 24 February or who were on EU territory just before this date and to non-Ukrainian nationals with a non-permanent residence permit who cannot return to their country of origin in safe and durable conditions'.⁴

While the consecutive extensions of the TP aimed to ensure continued support and rights for people fleeing Ukraine, in an opposing trend, changes have been made in national legislation by Member States (MS) to introduce restrictive policies and reductions in support for those under TP. In the face of prolonged uncertainty for millions of people temporarily residing in Europe, MS have moved towards reducing state support with the argument that the long-term character of the situation is putting high pressure on national resources.

1 <https://www.consilium.europa.eu/en/press/press-releases/2024/06/25/ukrainian-refugees-council-extends-temporary-protection-until-march-2026/>

2 [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Temporary_protection_for_persons_fleeing_Ukraine_-_monthly_statistics#:~:text=In%202023%2C%20over%201%20million,2022%20\(4%20331%20385\).](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Temporary_protection_for_persons_fleeing_Ukraine_-_monthly_statistics#:~:text=In%202023%2C%20over%201%20million,2022%20(4%20331%20385).)

3 <https://www.consilium.europa.eu/en/policies/refugee-inflow-from-ukraine/>

4 <https://www.consilium.europa.eu/en/policies/refugee-inflow-from-ukraine/>

The measures adopted range from reducing the number of days for which beneficiaries of TP may reside in state facilities for free, to reducing social welfare rates. Of particular concern is the fact that certain groups continue to be more affected by restrictive policies, namely people belonging to the Roma minority fleeing Ukraine and third-country nationals residing in Ukraine before the Russian invasion.

In 2023, Countries such as Poland, Czechia, and Latvia already moved to reducing the period of free residence in accommodation centres and introducing payment for longer stays (for example, for stays longer than 120 days in Poland and 150 days in the Czech Republic).⁵ Looking into changes introduced in 2024, this trend continued with further cuts to support measures being implemented in or planned for the near future. For example, Norway announced an end to automatic asylum for all people fleeing Ukraine.⁶ In Germany, the conservatives asked to cut benefits for Ukrainians, particularly unemployment benefits, arguing that these discourage people from finding work.⁷ Ireland has also moved to reduce State-provided accommodation to a maximum of 90 days (from being initially unlimited), as well as social welfare rates. Hungary has withdrawn housing support for people arriving from certain areas of Ukraine, a highly criticised measure which still awaits to be seen if it is in full agreement with EU law. Overall, at least 12 countries in Europe have adopted or announced reductions in the level of support to beneficiaries of TP (or under other schemes of support).

At the European level, the European Commission initiative titled ‘Safe Homes’ – the main support programme in the area of access to accommodation and housing - has come to a stale point. In 2022, the International Red Cross was awarded a project budgeted at €5.5 million with the aim of testing and operationalising the Safe Homes Guidance.⁸ The project incorporated an operational and a lessons-learned module and covered activities related to private hosting by National Red Cross Societies in 10 EU Member States.⁹ Following the end of the project in summer 2024, no follow up was announced on what the Safe Homes will become or what type of further support the EC will implement to further ensure access to accommodation and housing for beneficiaries of TP. Meanwhile, in an increasingly difficult situation to access affordable housing, issues remain with overcrowding, reduced shelter availability, and a high risk of homelessness, with some cases registered where people have been sleeping on the streets.

In the context of the extension of the TP as well as considering the restrictive trend in national legislation changes, and the lack of follow up from the European Commission on its initiative dedicated to housing (Safe Homes) – FEANTSA raises awareness on **the need to ensure access to suitable and affordable accommodation and housing for people fleeing Ukraine**. Particularly considering the general context where housing prices have

5 <https://migrant-integration.ec.europa.eu/system/files/2023-02/ECRE-Update-January-2023-Implementation-of-the-TPD.pdf>

6 <https://www.rte.ie/news/ukraine/2024/0927/1472347-norway-ukraine/>

7 <https://www.dw.com/en/germany-cdu-conservatives-cut-unemployment-social-benefits-ukraine-war-refugees-v2/a-70844203>

8 Stand with Ukraine: EC awards €5.5 million to ensure safe homes for those fleeing Ukraine, 30 November 2022.

9 Red Cross EU Office, Annual Report 2022, REF. RCEU 04/2023 – 002, April 2023.

increased and challenges to gain affordable accommodation are multiple, reducing support measures and adopting restrictive policies will in turn have a negative impact on the situation with housing and accommodation for people who are fleeing Ukraine, including an increased risk of homelessness.

Country	Number of Ukrainian refugees (October 2024)	Estimates of individuals experiencing or at risk of homelessness
Czech Republic	379,370	<p>24,834 Ukrainian TP holders reside in collective accommodation facilities (approx. 16% of Ukrainian refugees in Czechia)</p> <p>33,000 supported by social organisations in Prague</p>
Hungary	38,480	Estimated 3,000 beneficiaries of TP face destitution and homelessness following Government Decree 134/2024
Poland	983,880	<p>Approximately 31,000 people are living in homelessness (The Ministry of Family, Labour and Social Policy in Poland, February 2024)</p> <p>10% of 31,000 are migrants. As many as 60% of these migrant individuals are Ukrainian citizens</p>
Germany	1,140,705	<p>136,900 Ukrainian refugees in shelter accommodation (>10% total; January 2024)</p> <p>1,168 sleeping rough (January 2025)</p>
The UK	244,560 (July 2024)	<p>9,540 Ukrainian families who have been at risk of homelessness in England since February 2022; 6,330 were on the Homes for Ukraine scheme</p> <p>Of these, 5,760 had been at risk of homelessness due to sponsor arrangements breaking down</p>
Scotland	47,796 (August 2024)	Nearly 600 Ukrainian refugees in Scotland have faced homelessness or the threat thereof (February 2022)

Homelessness in Ukraine

“Every day more people lose their homes because of occupation, shelling or because they’re close to the frontline. We cannot help everyone alone.”

- Anna Skoryk, interim chief executive of Depaul Ukraine, in the Guardian

The purpose of this briefing is not to take account of the levels of homelessness within Ukraine, which would be impossible at this point given that there is no collection of reliable data. However, given the high-level of destruction of housing in the country and the impact that this will have on the returns of people who fled to Europe when the situation is stable enough, we will begin by taking note of what is known about homelessness in Ukraine.

Before the full-scale invasion of Russia in Ukraine, the latest homelessness count revealed 50,000 people officially registered as experiencing homelessness, though this was believed to be an underestimate. Local organisations stated that 200,000 was a more realistic figure.¹⁰ Despite the lack of reliable data, a recent report by Depaul International and Depaul Ukraine shows that following the Russian invasion in 2022, ‘undoubtedly hundreds of thousands of people are experiencing homelessness and millions are at-risk. This includes people sleeping rough, in emergency shelter, in temporary accommodation and at-risk in institutions such as hospitals and prisons’.¹¹

The report goes on to show that the large-scale internal displacement and destruction of homes caused by the war are fundamental factors leading to homelessness in Ukraine. An estimated 3.5 million people have fled their homes to other parts of the country. One in ten houses have been damaged or destroyed, affecting an estimated two million households. Almost a quarter (22%) of the people sleeping rough or in emergency shelters who were interviewed for the study were people who had been displaced following the Russian invasion.¹² With a reduced state support for internally displaced people as of March 2024, and a protracted, dynamic, and unpredictable conflict ongoing, the organisations behind the report predict an increase of homelessness within Ukraine in the coming period.

10 Yuliia Turba, “Local government relationships in addressing homelessness”, Master’s thesis, Central European University, 2023

11 https://uploads.guim.co.uk/2024/09/23/Final_Homelessness_in_Ukraine_Report.pdf

12 https://uploads.guim.co.uk/2024/09/23/Final_Homelessness_in_Ukraine_Report.pdf

Europe: risk of homelessness and restrictions for people fleeing Ukraine

Despite a lack of data, experiences of and an increased risk of homelessness for people fleeing Ukraine has been observed in many countries where they have settled under TP or other forms of protection. In 2023, there were already reports of problems with accessing suitable accommodation across all MS for people who were fleeing Ukraine.¹³ Across 2024, experiences of homelessness have been noted and in the context of reduced support, this risk will continue to heighten. As recounted in the next pages, at least 12 countries in Europe have moved towards adopting or already announced reductions in the level of supports to beneficiaries of TP (or under other schemes of support). In minimum six of those countries, we have identified reports of people having faced homelessness or the threat thereof.

In the **Czech Republic**, Local for Local 2023's Report on the situation of people from Ukraine in Prague in the context of homelessness rang the alarm over one year ago regarding the threat of homelessness among people from Ukraine. They confirmed this hypothesis following four-months of research in Prague. As main causes they highlight the reduction in support for Ukrainians in the Czech Republic, combined with the already high percentage of newcomers remaining below the poverty line (57%) as well as the increased share of the extremely vulnerable individuals – even though 72% of the economically active have jobs and incomes continued to grow, the majority were said to still work below their qualifications and very often in precarious conditions.¹⁴

Lex Ukraine V which entered into force on 1 April 2023 repealed the payment of the accommodation allowance to solidary households and limited direct payment to Ukrainian TP holders under the humanitarian benefit to 50 days. After this period, the allowance was only to be provided to vulnerable Ukrainian TP holders.¹⁵ On 1 January 2024 Lex Ukraine VI entered into force and introduced a further number of changes to the assistance provided to Ukrainian TP holders. One such change is a shortened period of cost-free accommodation for newly arrived TP holders provided by the state, reducing it from 150 to 90 days, including for vulnerable persons. As a

13 FEANTSA Policy Paper: Standards for reception conditions under the Temporary Protection Directive – challenges and needs in accessing adequate accommodation, August 2023.

14 Local to Local *Report on the situation of people from Ukraine in Prague in the context of homelessness*, December 2023 <https://mistnimistnim.cz/wp-content/uploads/2024/02/situacni-zprava-UA-2023.pdf>

15 For more details on the changes, please consult IOM's *Accommodation and Financial Situation of Ukrainian Refugees*, p. 5.

result, many residents of collective accommodation facilities would need to relocate to standard housing as of the 1st of September when the legislative provision on housing came into effect. Among available options would be to begin paying for housing in collective accommodation facilities or to move into standard housing.

Following this change, the Office of the United Nations High Commissioner for Refugees and the International Organization for Migration were commissioned with examining the options for the safe and dignified relocation of beneficiaries of TP from collective accommodation facilities to regular housing.¹⁶ Their report, published in April 2024 shows that there is a need to address the rental housing market situation and provide alternative financial support to prevent debt, exploitative labour, social exclusion, and **homelessness**. The report further notes that, to systematically mitigate the risks of homelessness, negative coping mechanisms and other serious risks, after entry into force of the limited cost-free accommodation (September 2024) vulnerable groups should be supported through increased humanitarian allowance for Ukrainian TP holders. As for individual factors that prevent residents to move to regular housing, psychological difficulties were identified as well as a dire financial situation. Simultaneously, accommodation was identified as the most urgently reported need with respondents in collective accommodation facilities highlighting challenges in accessing sustainable and affordable housing (especially considering the precarious financial situation of many). 78% respondents said they would not be able to pay more than CZK 5,000 (EUR 200) a month for accommodation which is well below the market price.

A few days after the Council extended TP for Ukrainian refugees until March 2026, **Hungary** has withdrawn housing support for people arriving from certain areas of Ukraine. Access to central state accommodation was limited only to those from the Ukrainian territories affected by war operations. Hungarian Government Decree 134/2024 (amending Decree 104/2022) stipulates that people fleeing from areas of Ukraine where there is no fighting will no longer be eligible to receive state housing as of 21 August 2024.¹⁷ Back in July 2023, the Hungarian Helsinki Committee had already reported that the Hungarian government amended the decree that regulates the services available to beneficiaries of TP, significantly limiting access to state-funded mass shelter. The changes, entering into force on 1 August 2023, prescribed among others that free (mass) shelter is only provided for one month upon receiving TP, except for certain groups of vulnerable beneficiaries (e.g. pregnant women, persons living with disability).¹⁸ As the TPD requires Member States to ensure that beneficiaries of TP have access to suitable accommodation, this restriction was denounced as a violation of EU law.¹⁹

¹⁶ https://migrant-integration.ec.europa.eu/library-document/czech-republic-supporting-dignified-relocation-ukrainian-temporary-protection_en

¹⁷ <https://english.nv.ua/nation/hungary-tightens-regulations-for-ukrainian-refugees-limiting-aid-50444775.html>

¹⁸ https://www.refworld.org/reference/countryrep/hhc/2024/en/148648?prevDestination=search&prevPath=/search?ss_document_type_name%5B%5D=Country+Reports&sort=score&order=desc&result=result-148648-en

¹⁹ https://www.refworld.org/reference/countryrep/hhc/2024/en/148648?prevDestination=search&prevPath=/search?ss_document_type_name%5B%5D=Country+Reports&sort=score&order=desc&result=result-148648-en

The strict measure introduced by Decree 134/2024 was highly criticised by both local and international stakeholders. The Hungarian Helsinki Committee urged that ‘the unprepared and ruthless regulation must be withdrawn’ while showing that the changes also meant that for ‘those who are currently living in state accommodation, but there is no military activity in their former place of residence, are given only six days by the decree to apply for continued accommodation, given their special situation. (...) It is not clear who will inform them about this and who will help them with the administration. Another significant restriction is that the state will only provide accommodation for new arrivals for one month or until the end of the asylum procedure if they come directly from war-torn areas and can “credibly prove it.” Only people over 65, people with disabilities, pregnant women, children, and “a legal representative living in the same household” will be allowed to stay in such accommodation. The latter means that only one parent will be allowed to stay in a couple with children, meaning that the persecuted family will be torn apart by the state.’²⁰

The European Roma Rights Centre (ERRC) highlighted that ‘the decree’s impact is most severe on the Hungarian-speaking Romani refugees from Transcarpathia, a region in western Ukraine.’ The ERRC further notes that the decree represented a threat ‘to expel tens of thousands of Ukrainian Romani refugees from their subsidized housing and that this sudden policy shift puts already vulnerable families, including women and children, in an even more risky situation, forcing them to choose between homelessness in Hungary or returning to their war-torn country.’²¹

Several Members of the European Parliament (MEPs) have called for Hungarian accountability on withdrawal of help and they have written to the European Commission to enquire on the compatibility of such a measure with EU law. MEPs also enquired on the urgent actions the EC was planning to take ‘before 21 August 2024 to safeguard the relevant harmonised standards on the basis of the TPD, and to ensure that Ukrainians seeking or enjoying TP status in Hungary will continue to have access to housing?’²² In the written question, MEPs note that ‘As a result, most of the Ukrainians currently seeking TP in Hungary will have their rights curtailed and those currently enjoying TP status on the basis of the TPD face uncertainty about whether or not they will continue to have a roof over their heads.’ At the moment of writing, there is no available answer from the EC to the MEPs written question submitted on 26 June 2024, the status being that ‘The Commission is in the process of conducting an assessment of the legislative changes introduced by Hungary.’²³

In 2024, UNHCR Hungary reported a continued reduction of refugees hosted in collective sites (from 14% to 9%) and an increase in private accommodations (from 43% to 58%). Additionally, more refugees seem to be covering fully housing costs themselves and while 76% of households reported paying their rent on time, 22% faced delays, which could jeopardise

20 <https://helsinki.hu/a-kormany-nem-ad-tovabb-szallast-a-karpataljai-menekuloknek/>

21 <https://www.errc.org/news/hungarian-governments-new-decree-threatens-ukrainian-romani-refugees>

22 https://www.europarl.europa.eu/doceo/document/P-10-2024-001430_EN.html

23 https://www.europarl.europa.eu/doceo/document/P-10-2024-001430-ASW_EN.html

their housing security if the issue persists.²⁴ Nearly a third of the households surveyed were lacking a written formal tenancy agreement which leaves people vulnerable to arbitrary changes and potential exploitative behaviours by landlords,²⁵ as well as at risk of homelessness. The situation becomes even more worrisome when considering employment, which is often unstable or low-wage, and therefore insufficient to cover essential costs such as those of housing and food. Uncertainty for long term housing, poor living conditions, and discrimination from landlords have also been reported.²⁶

In **Poland**, which has welcomed nearly one million Ukrainians fleeing to safety, concerns about social benefits arise as the conflict prolongs. The Polish foreign minister has called for putting an end to EU benefits for men of fighting age, arguing that “it encouraged draft dodgers in Ukraine”.²⁷ On 1 July 2024, Poland cancelled the 40+ program for Ukrainian refugees which provided monetary compensation for housing Ukrainians for homeowners.²⁸ Initially, the programme was set up to run for up to 120 days from the date of the first entry into Poland, and longer for vulnerable groups. At the end of the first quarter of 2024, approximately 50,000 people benefited from such support, more than half of whom were people from particularly vulnerable groups - with disabilities, chronic diseases, the elderly or families with many children.²⁹ Citing the need to support domestic social programs and investments in economic development, the Ministry of the Interior and Administration of Poland put an end to the programme, shifting responsibility to local authorities, in particular voivodeship governments, for placing people in collective centres. Accommodation in these centres is to be free for the first 120 days. Vulnerable categories will be able to stay free of charge in the future, while other beneficiaries will have to pay up to 60 zlotys (approx. 14 Euro) per day.³⁰ Other support options can be found with charitable organisations, portals created by the government to help Ukrainians with temporary housing, and free housing offers through solidarity networks or small hotels and guesthouses.

While most Ukrainian households lived in rented apartments (53% were renting on their own) and host families (14%),³¹ the most vulnerable refu-

24 https://migrant-integration.ec.europa.eu/library-document/hungary-socio-economic-insights-survey-2024_en

25 https://migrant-integration.ec.europa.eu/library-document/hungary-socio-economic-insights-survey-2024_en

26 UNHCR 2024. The data were collected in June and early July 2024, before a significant policy change was announced in July. This change, which came into effect on August 21, revised subsidized accommodation provided by the Hungarian government to refugees from “war-affected areas” in Ukraine, specifically 13 oblasts. Therefore, the findings do not account for the potential impact of this policy shift.

27 <https://www.euronews.com/2024/09/15/poland-calls-for-end-to-eu-benefits-for-ukrainian-men-of-fighting-age>

28 <https://visitukraine.today/blog/4278/where-can-ukrainian-refugees-find-free-housing-in-poland-in-2024?srsId=AfmBOopRblQ-EKsaUmgCIgYaTpmxkyfBGhJk80ufgP3xtA4AVz2R6PYq>

29 <https://www.polskieradio.pl/395/7991/artykul/3425025,do-some-ukrainian-war-refugees-in-poland-face-a-homelessness-crisis>

30 <https://visitukraine.today/blog/4278/where-can-ukrainian-refugees-find-free-housing-in-poland-in-2024?srsId=AfmBOopRblQ-EKsaUmgCIgYaTpmxkyfBGhJk80ufgP3xtA4AVz2R6PYq#what-is-the-40-program-and-why-was-it-canceled>

31 <https://migrant-integration.ec.europa.eu/system/files/2024-04/IOM-Poland-Integration-snapshot.pdf>

gees continue to live in collective centres (7%)³² and in hostels (13%)³³, which used to be supported by the governmental programme 40+. At the same time as not being able to count on the 40+ programme anymore, residents of the collective centres have registered the highest rates in needing financial support – when asked if they could afford an unforeseen expense of approximately 232 Euro, as much as 92% of individuals residing in collective sites reported inability to afford such an expense.³⁴ Discrimination against people with mental disabilities that are not accepted in collective centres has been reported, and as a result people decide to go back to Ukraine or must rely on NGO support that is diminishing each year. Discrimination on the private rental market was also signalled, especially in the case of the Roma minority, with reported cases of bias when trying to secure private housing, including higher levels of refusals and risks of forced eviction.

In February 2024, the latest nationwide study on homelessness conducted by the Ministry of Family, Labour and Social Policy showed approximately 31,000 people were living in homelessness in Poland. Out of these, 10% were migrants and 60% of these migrant individuals were Ukrainian citizens.³⁵ In the context of further restrictive policies and generally an affordable housing crisis, the risk of homelessness among beneficiaries of TP in Poland is a real threat as signalled by organisations such as Habitat for Humanity³⁶ or the International Rescue Committee.³⁷

In **Lithuania** there have been reports of multiple challenges faced by beneficiaries of TP, included amongst which are the risk of human trafficking, mental health problems and trauma, unemployment, illegal employment, exploitation, language barriers, as well as discrimination. Housing difficulties persist in this case as well, as finding suitable long-term accommodation is challenging, individuals often relying on temporary housing solutions. The scarcity of affordable housing options exacerbates this issue, leading to uncertainty and instability³⁸ as well as an increased risk of homelessness. Authorities offer the possibility to access temporary accommodation if an individual is of high risk, as well as financial aid, easier process of qualification recognition, language courses. In practice, it is mostly NGOs who provide financial support, accommodation, humanitarian aid, social, legal consultations, psychological help, activities, and language courses.

In 2024, Lithuania implemented legislative changes affecting support for Ukrainians. Effective from the 1st of September 2024, Lithuania ended special provisions that had facilitated employment for Ukrainian nationals

32 <https://reliefweb.int/report/poland/regional-refugees-response-ukraine-situation-shelterhousingaccommodation-sector-poland-january-2024-enpl>

33 <https://reliefweb.int/report/poland/regional-refugees-response-ukraine-situation-shelterhousingaccommodation-sector-poland-january-2024-enpl>

34 <https://migrant-integration.ec.europa.eu/system/files/2024-04/IOM-Poland-Integration-snapshot.pdf>

35 https://migrant-integration.ec.europa.eu/news/poland-homelessness-among-migrants_en#:~:text=The%20study%20found%20that%20approximately,migrant%20individuals%20are%20Ukrainian%20citizens.

36 <https://www.polskieradio.pl/395/7991/artykul/3425025,do-some-ukrainian-war-refugees-in-poland-face-a-homelessness-crisis>

37 <https://www.rescue.org/eu/press-release/irc-report-reveals-urgent-needs-ukrainian-refugees-poland-amidst-legal-uncertainty>

38 <https://lithuania.iom.int/news/iom-lithuania-main-challenges-ukrainians-baltic-states-financial-stability-employment-and-language-barrier?utm>

before receiving the relevant temporary residence permit. Previously, these individuals could work without a residence permit; with the change, they now require appropriate permits to engage in employment.³⁹

Greece has repeatedly reported not meeting immediate needs for refugees, as well as for beneficiaries of TP. Access to accommodation, overcrowding and access to food or are recurring problems. Instances of homelessness among Ukrainians are noted, particularly among unaccompanied minors and vulnerable individuals. Organisations like METAdrasi have established shelters to accommodate children and women experiencing homelessness from Ukraine. Their dormitory in Athens, operational since April 2021, has hosted numerous children facing homelessness, including those from Ukraine.⁴⁰

Additionally, the general housing shortage in Greece has affected asylum seekers and refugees, including Ukrainians. Many face challenges in securing stable accommodation, leading to increased risks of homelessness.^{41 42} It is important to note that while people fleeing Ukraine are entitled to access public services in Greece, including healthcare, the overall strain on resources and infrastructure can impact the level of support available.⁴³

A New Migration Code adopted on 1st of January 2024 in Greece (Law 5028/2023), amended previous provisions related to residence permits, family reunification, and labour market access.⁴⁴ While the code primarily addresses the broader migrant population, it may indirectly impact Ukrainian nationals, especially those seeking long-term residency or family reunification.

In 2023, the legislation stipulating the support available to displaced people from Ukraine in **Romania** has been changed, introducing a new scheme to regulate accommodation and food subsidies. The new scheme replaces the original mechanism - which allocated a certain amount towards accommodation and food per person per day - with a lump sum for accommodation granted to cover a period of four months per family or per single person, and a second lump sum per person for food. After these four months recipients could continue to receive the accommodation subsidy until the end of 2023, provided they fulfil certain additional conditions. These conditions include the ability to show proof of employment or that they are actively job seeking, and proof that any children are enrolled in the mainstream education system or other accredited educational programmes.⁴⁵ Authorities cited as reasons the goal to reduce the possibility of fraud in the accommodation subsidies system. However, certain conditions are considered difficult to meet and risks of destitution, including

39 <https://www.sorainen.com/publications/the-special-regulation-regarding-citizens-of-ukraine-has-been-abolished/?utm>

40 <https://metadrasi.org/en/the-dormitory-of-metadrasi-sheltering-homeless-refugee-children-and-women-from-the-ukraine/?utm>

41 <https://www.infomigrants.net/en/post/52725/asylum-seekers-bear-the-brunt-of-the-greek-housing-shortage?utm>

42 Rescue.org

43 UNHCR Help

44 https://migrant-integration.ec.europa.eu/library-document/greece-new-migration-code_en

45 https://migrant-integration.ec.europa.eu/library-document/romania-changes-support-those-displaced-ukraine_en?utm

homelessness, appear.

While there have not been widespread reports of homelessness among Ukrainians in Romania, there have been some challenges and concerns regarding housing and living conditions. Challenges with temporary housing and transition to permanent housing have been raised, while some shelters in Romania became overcrowded, leading to uncomfortable living conditions. Overcrowding can sometimes lead to issues of displacement or temporary homelessness, where families or individuals are forced to stay in inadequate conditions while they wait for more permanent housing. Organisations active in the homelessness sector, such as Carusel, collaborate with Romanian authorities and other organisations to arrange temporary housing for those who have lost their homes due to the conflict. Carusel also provides emergency shelters in both government-managed centres and those run by the NGO itself. Beyond accommodation, the organisation offers legal advice, job assistance, social integration support, food, and medical care.⁴⁶

In **Ireland**, while the protections for Ukrainians have prevented them from ending up in the emergency accommodation system, there are still signs of reduced entitlements and homelessness. For those who registered for TP and State-provided accommodation at any time from 14 March 2024, they started being accommodated for a maximum of 90 days, as opposed to not having a time limit initially. Furthermore, social welfare rates have been reduced: 'Standard social welfare payments will no longer be available to a person while they are resident in Designated Accommodation Centres'. On the website offering information to people fleeing Ukraine it is also stated that 'There is a shortage of accommodation in Ireland. The type of place you will be offered depends on what is available at that time. You may have to stay in a community centre, sports ground or in tented accommodation for a period. In some cases, you might not get anywhere to stay.'⁴⁷

Already in 2023 Ukrainians have faced recurrent episodes of homelessness in Ireland, including sleeping rough, amongst government plans to house up to 6,000 people in refurbished accommodation by end of 2024.⁴⁸ In the past year, asylum seekers in the country have also experienced homelessness and racist attacks, with a makeshift camp in Dublin city centre being set alight.⁴⁹

Since February 2022, over 88,812⁵⁰ Ukrainians have sought refuge in Belgium under the EU's TPD. A majority (63,546) does not need accommodation/shelter, but a number of 18,334 individuals remain in need of accommodation. The Belgian government has implemented a two-phase housing strategy, including crisis reception and longer-term accommodation. Housing was also provided by private individuals, local authorities, or organisations offering spaces upon request from the local authority.

46 <https://carusel.org/causes/solidaritate-cu-ucraina/>

47 <https://www.citizensinformation.ie/en/moving-country/asylum-seekers-and-refugees/the-asylum-process-in-ireland/coming-to-ireland-from-ukraine/#4583cd>

48 <https://www.irishtimes.com/politics/2023/06/09/up-to-6000-ukrainians-could-be-housed-in-refurbished-accommodation-by-end-of-2024-ministers-hear/>

49 <https://www.thejournal.ie/garda-protest-tents-sandwith-street-6066908-May2023/>

50 <https://statbel.fgov.be/nl/visuals/oekraiense-ontheemden>

Accommodation was organised in assisted living facilities, service flats, hotels, hostels, youth centres, holiday homes, B&Bs, holiday parks, or other tourist accommodations. Two Emergency Villages were opened in Antwerp and Mechelen and have been operational since mid-2022 but closed at the end of 2024, when residents will have to seek housing in the private rental market. The housing crisis also makes private rentals and social housing harder to access, forcing many to stay with friends or family, with some ending up on the street.

While these diverse forms of accommodation and housing contributed to preventing widespread homelessness, the sheer volume of arrivals has placed a strain on Belgium's housing and social services. Cases of Ukrainians sleeping rough in the immediate period after arrival in Belgium have been registered, and the homelessness sector has been more and more involved in supporting with accommodation solutions, for beneficiaries of TP as well as for asylum seekers - one year after the outbreak of the war, Samusocial accounted for providing accommodation to almost 3,000 people from Ukraine.⁵¹ In October 2024, reports came out that Ukrainians in Belgium, including children, were forced to sleep on the streets.⁵² Despite their right to TP, the shortage of places has seen Ukrainian men being denied shelter since September.

In Brussels, the influx of refugees and asylum seekers, including Ukrainians, has led to the occupation of vacant buildings as informal shelters. For instance, in December 2022, approximately 350 refugees, (primarily from Moldova and Ukraine, began squatting in an empty office block in Zaventem, a suburb of Brussels.⁵³ Additionally, in October 2022, around 200 asylum seekers occupied a large empty building in central Brussels that was initially being renovated for Ukrainian refugees.⁵⁴ These squats highlight the challenges faced by displaced individuals in securing adequate housing and the strain on Belgium's asylum system. Broader issues of inequity in refugee treatment have emerged, with non-Ukrainian asylum seekers often facing tougher conditions, including homelessness and overcrowded reception centres.

As of November 2024, over 1.1 million Ukrainian refugees reside in Germany.⁵⁵ At the end of January 2024, around 439,500 housed homeless people in Germany and 136,900 Ukrainian refugees were recorded in the statistics, meaning that 31% of those housed in rented housing, collective accommodation, or facilities for the homeless were Ukrainians.⁵⁶ In January 2025, the estimates for people who live on the streets without any accommodation, as well as forms of hidden homelessness were also published: 1,168 Ukrainians were found sleeping rough and 218 were in hidden homelessness.⁵⁷

51 <https://samusocial.be/crise-ukraine-un-an-apres-pres-de-3000-refugie%C2%B7e%C2%B7s-he-berge%C2%B7e%C2%B7s-par-le-samusocial/>

52 <https://www.brusselstimes.com/1280648/ukrainian-refugees-left-sleeping-rough-again-due-to-belgian-shelter-crisis>

53 <https://www.vrt.be/vrtnws/en/2022/12/01/350-refugees-squatting-in-zaventem-office-block/?utm>

54 <https://www.reuters.com/world/europe/asylum-seekers-shelter-brussels-squat-belgian-asylum-system-comes-under-strain-2022-10-28/?utm>

55 <https://www.kyivpost.com/post/43064?utm>

56 https://www.destatis.de/DE/Presse/Pressemitteilungen/2024/07/PD24_282_229.html

57 *Wohnungslosenbericht der Bundesregierung, Germany, January 2025*

Since 2022, Germany has maintained its support for Ukrainian refugees, though there have been discussions and proposals regarding potential changes. In 2022, the federal government decided to provide Ukrainians with «Bürgergeld» (citizen's income) to streamline bureaucracy. However, by mid-2024, some municipal associations began debating whether to continue this approach. The German County Association (Deutscher Landkreistag) suggested reverting to asylum seeker benefits for new arrivals, while the German Association of Cities (Deutscher Städtetag) advocated for maintaining the current system to facilitate refugees' integration into the workforce. As of January 2025, there have been no official cuts in support for Ukrainian refugees in Germany. The federal government continues to provide financial assistance, and the «Bürgergeld» remains in place for Ukrainian refugees. While other European countries have reconsidered their support levels, Germany has sustained its commitment, although public and political scrutiny has increased.⁵⁸

In October 2024, in **France**, the government instructed displaced Ukrainians in the Grand-Est region to vacate their subsidised accommodations by 31 October, citing insufficient progress toward professional integration and autonomy.⁵⁹ This directive has affected numerous people who fled the conflict in Ukraine and were housed by aid organisations with government rental assistance. Ukrainian associations have criticised the decision, highlighting that many displaced individuals are vulnerable due to age, illness, or young children, and arguing that the transition to alternative housing has been poorly managed. Following interventions from human rights organisations, eviction deadlines were postponed to the end of December. This decision, combined with challenges related to accessing housing, will contribute to an increased risk of homelessness as well as compelling some to consider returning to Ukraine, even to frontline regions.

The French programme titled Rental Intermediation / Intermédiation Locative (IML) Ukraine⁶⁰ was established to support individuals displaced by the ongoing war in Ukraine. Since the IML Ukraine was gradually set up, association managers have noted a lack of visibility for the scheme and its funding, dependent on political arbitration that is slow in coming and short-term, while the war in Ukraine continues and an end of the conflict is not foreseen any time soon. A survey conducted among program managers revealed that 87% lack visibility on funding beyond the initial six months, with 31% not having received their full 2023 allocations by the end of the first quarter of 2024. The majority of those assisted are single-parent families with children, facing significant barriers in accessing employment, housing, and social benefits. French associations recommend maintaining the programme for as long as the TP is extended, to a minimum of €2,375 in funding per IML Ukraine measure to ensure adequate support.⁶¹ This would contribute to prevent overburdening

58 <https://www.welt.de/politik/deutschland/plus252120158/Buergergeld-fuer-Ukraine-Fluechtlinge-Jetzt-zerbricht-die-Einigkeit-der-Kommunen.html?utm>

59 https://www.lemonde.fr/en/france/article/2024/10/24/french-government-orders-displaced-ukrainians-to-give-up-subsidized-accommodation_6730353_7.html?utm

60 <https://interaide.fr/iml>

61 <https://www.federationsolidarite.org/actualites/enquete-iml-ukraine-les-associations-inquiet->

existing asylum and general support systems and establishing dedicated channels within social security organisations for displaced individuals from Ukraine.

In the **Netherlands**, discussions have emerged regarding potential adjustments to the support provided to Ukrainian beneficiaries of TP. In early 2024, a reduction of the living allowance was suggested by Dutch legislators in the case of employed Ukrainians, who should contribute more towards their housing and food expenses.⁶² This proposal aims to adjust the financial support system to reflect individuals' employment status. Though this measure was not put in practice throughout 2024, concerns remain on limitations of rights for beneficiaries of TP in the Netherlands, with debates on shortening the residency duration to two years initiated towards the end of 2024. Overall, the government has maintained a focus on finding ways to encourage voluntary returns for Ukrainians, for example by creating conditions for further employment or participation in Ukraine's reconstruction programs.⁶³ In October 2024, Dutch authorities closed a large reception centre, leaving many refugees to find housing independently. This move has raised concerns about the adequacy of support and accommodation for Ukrainians.

The situation concerning third-country nationals who fled Ukraine due to the conflict and sought refuge in EU Member States is particularly concerning. Overall, a limited number of countries made use of Article 7 of the TPD which allowed the optional extension of the TPD beyond the minimum groups covered. Initially, the Netherlands has applied the optional provision of Article 2(3) of the Implementing Decision to the group of third-country nationals with temporary residence permits in Ukraine but has proceeded with rolling back this measure later in 2023. FEANTSA and its Dutch members at Valente have raised awareness on the risk of destitution and homelessness that this type of measure may bring for third country nationals in the country.⁶⁴ This decision faced legal challenges and led to a case before the Court of Justice of the European Union (CJEU). At the end of 2024, the Court of Justice of the EU issued an unfavourable opinion on TP regarding the rights of third country nationals with temporary residence in Ukraine.. The court ruled that Member States have discretion to end TP for those groups who were not primarily covered by the TPD.⁶⁵ The CJEU has noted that a Member State which has extended TP to certain categories of persons, beyond what is required by EU law, may withdraw that protection from them without waiting for the TP granted under EU law to end.

After Russia's invasion of Ukraine in February 2022, **Norway** decided to provide *collective protection* to all Ukrainians by granting automatic asylum. Almost two years later, the Norwegian authorities decided they will no longer automatically grant asylum to all Ukrainians, and they

ent-pour-lavenir-du-dispositif/

62 <https://english.nv.ua/nation/dutch-mps-suggest-cutting-aid-to-ukrainian-refugees-50397305.html>

63 <https://fact-news.com.ua/en/the-minister-of-migration-of-the-netherlands-proposed-to-reduce-the-period-of-residence-for-refugees-to-two-years/>

64 <https://www.feantsa.org/en/feantsa-position/2023/08/22/feantsa-and-valente-for-the-extension-of-temporary-protection-for-third-country-nationals-in-the-netherlands?bcParent=27>

65 <https://curia.europa.eu/jcms/upload/docs/application/pdf/2024-12/cp240203en.pdf>

will start examining case-by-case the applicants arriving from western Ukraine (Lviv, Volhynia, Transcarpathia, Ivano-Frankivsk, Ternopil and Rivne). The decision was to be effective immediately. Having taken in an estimate of 85,000 Ukrainians since 2022, the authorities now justify the change by referring to the pressure put on housing, health care and schools in some cities.⁶⁶

While there have been no widespread reports of homelessness among Ukrainians in Norway, the recently implemented policy changes could impact their housing stability. Additionally, Norway has introduced measures to reduce financial support for Ukrainians. These include discontinuing financial aid for those staying outside asylum centres and implementing longer residency requirements before eligibility for certain welfare benefits. Such changes may increase the risk of housing instability among this population.⁶⁷

In the **UK**, the British Red Cross reported that more than 9,000 Ukrainian refugee households have been put at risk of homelessness due to a reduction in the number of hosts offering accommodation and inadequate local authority support. Ukrainians were found to be four times as likely as the general population to experience homelessness.⁶⁸ The main reasons for the risk to homelessness for those hosted under the Homes for Ukraine scheme were a breakdown of relationships with host families followed by further difficulties in accessing the private housing market. The report shows that safeguarding challenges led to some instances of exploitation and abuse, highlighting cases of sexual exploitation, homelessness experienced over night as well as overcrowding and poor living conditions. Similarly to several countries in the EU, most people displaced from Ukraine to the UK have experienced challenges in accessing longer-term accommodation. Factors cited in relation to this were difficulties meeting the requirements of landlords, the high cost of living, and a lack of social and affordable housing options.

Since Russia's invasion of Ukraine in February 2022, nearly 600 Ukrainian refugees in **Scotland** have faced homelessness or the threat thereof.⁶⁹ Many have lost their sponsor placements, leading to instability and a scramble for accommodation. Factors contributing to this crisis include breakdowns in relationships with host families, cultural differences, the cost-of-living crisis, and underfunded councils. Support organisations are urging local authorities to improve access to stable housing and provide more information on applying for social housing. The Scottish Government's Super Sponsor scheme offered Welcome Accommodation in hotels for up to six months, facilitating better resettlement opportunities. However, many refugees remain in temporary accommodations or are staying with friends, highlighting the need for better support and quicker transitions to permanent housing.

66 <https://www.rte.ie/news/ukraine/2024/0927/1472347-norway-ukraine/>

67 ETIAS

68 <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/how-people-displaced-by-the-conflict-in-ukraine-are-finding-safety-in-the-uk>

69 <https://www.thescottishsun.co.uk/news/13651185/ukrainian-refugees-homeless-crisis-scotland/?utm>

Conclusion

The situation of people fleeing Ukraine in various European countries is marked by uncertainty as well as high poverty rates, precarious employment, and systemic policy challenges that collectively elevate the risk of homelessness. Further legislative changes have compounded these challenges, such as the Czech Republic's Lex Ukraine V and VI, Hungary's Decree 134/2024, or Poland's cancellation of the 40+ housing program. These policy shifts have reduced financial and housing support, directly impacting vulnerable groups among those fleeing the war, thereby increasing the risk of homelessness. Even when individuals gain employment, many struggle to cover basic expenses.

Specific groups, including women, children, the elderly, and minorities such as the Roma, or third country nationals living previously in Ukraine are particularly vulnerable due to discriminatory practices in both the housing market and the allocation of state-provided accommodation. Moreover, as many countries, including Ireland, Germany, and Poland, shift from collective or state-provided accommodations to private housing, refugees often encounter exploitative landlords, inadequate tenancy agreements, and increased financial burdens, exacerbating their housing insecurity. The introduction of time-limited housing assistance, such as Ireland's 90-day rule and Hungary's one-month allowance, has further heightened risks of eviction and homelessness. Refugees, especially those without sufficient integration support or access to affordable housing, are often left unprepared to transition to self-funded housing. Discrimination in the private rental market and public housing systems adds another layer of difficulty, particularly for people from racialised communities.

Restrictive national policies adopted in the past two years by Member States across the EU are in incompatibility with the TPD's objectives and raise questions about the uniform implementation of the directive. While the TPD mandates certain rights, implementation varies widely, and support has become uneven. Furthermore, the status of the European Commission initiative Safe Homes is currently uncertain, and no additional support was announced by the EC in this regard.

In the general context of an affordable housing crisis in Europe, the increase of homelessness among people fleeing Ukraine is becoming an emerging concern, given multiple uncertainties in accessing rights in the context of a prolonged state of the war. Several reports indicate that more individuals are living in shelters, squatting, or resorting to informal housing arrangements. These trends underscore the **urgent need for policy reform and enhanced support to prevent homelessness among people fleeing Ukraine.**

Key recommendations

- **Ensure governmental support across Europe:**
 - **Enhanced financial support:** Governments should reassess and increase housing allowances for refugees, particularly for vulnerable groups.
 - **Stronger legal protections:** Policies ensuring long-term tenancy security, social housing, subsidise for private housing and protection from discrimination in housing are crucial.
 - **Integration measures:** Programs to recognise qualifications, improve employment conditions, and provide accessible childcare can enable refugees to transition into stable housing.
 - **Innovative housing solutions:** Governments should collaborate with NGOs to explore community-based and affordable housing initiatives to address the ongoing crisis.
- **EU oversight:**
 - The European Commission must hold states accountable regarding the **enforcement of the TPD** to ensure minimum standards of support across Member States, including for access to housing.
 - The European Commission must renew its commitment to ensure access to housing for people fleeing Ukraine by guaranteeing **continuation of its Safe Homes initiative** and investing in long-term housing solutions.



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