

Temporary Protection Hungary

2024 Update

This annex on temporary protection complements and should be read together with the [AIDA Country Report on Hungary](#).

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Temporary Protection Procedure

A. General

The Hungarian Asylum Act regulates two forms of temporary protection which vary as to their geographical scope of application:¹

- ❖ The form under point a) Section 19(1) transposes the provisions of EU Directive 2001/55/EC² (Temporary Protection Directive, TPD) into Hungarian law. For its application, the Council of the EU should declare that, on grounds of a massive influx of third-country nationals, temporary protection must be granted to a predefined scope of eligible persons in EU Member States.
- ❖ Temporary protection under point b) of Section 19(1) of the Asylum Act is independent from the TPD and exists only under Hungarian law and as such, it is to be applied only in Hungary. This 'national' type of temporary protection is also invoked in case of mass influx of displaced persons, if they fled their country due to an armed conflict, civil war or other internal armed conflicts, or due to general, systematic and frequent violation of human rights – such as torture, cruel, inhuman and degrading treatment. The cases when this latter form of protection has to be applied and the scope of eligible persons are laid down by a government decree. The provisions of the TPD may not be invoked in this case, only the provisions of the national Asylum Act may be relied upon.

On 24 February 2022 at 10:00 PM in the evening, Government Decree 56/2022 (II.24.) came into effect, invoking point b) of Section 19(1) of the Asylum Act. The Hungarian Government, being the first in Europe, decided to grant temporary protection to everyone who had a legal basis to stay in Ukraine and fled the country to Hungary, regardless of their nationality. The national protection provided thereby was applicable until 7 March 2022. Since 8 March 2022, Government Decree No. 86/2022. (III. 7.) (TP Decree) is applicable. The TP Decree, transposing the provisions of the Council Implementing Decision,³ activated temporary protection under point a) of Section 19(1) of the Asylum Act, under which the TPD becomes applicable in Hungary. The former government decree based on national TP accorded a more extensive protection than the rules promulgated in the TP Decree, because it allowed non-Ukrainian third-country nationals fleeing from and legally residing in Ukraine to apply for temporary protection. However, that is no longer possible under the TP Decree currently in force (see [Qualification for Temporary Protection](#)). The new decree is applicable for those whose procedures had not been concluded when it came into force. In practice this retroactive effect only concerned the determination of the applications lodged by third-country nationals.⁴

The rights and obligations of the applicant, beneficiary and asylum authority, relative to temporary protection, are set out in the Asylum Act and Asylum Decree in line with the TPD. After enacting the TP Decree, the Hungarian government issued a series of further decrees and set a more detailed framework for accommodation, employment, education, information and supply for people eligible for temporary protection in Hungary. The provisions of these laws either set out a more detailed 'executive' regulation to those promulgated in the Asylum Act and Decree or diverge from their provisions.

On the most essential applicable laws in force concerning temporary protection in Hungary, see the following table:

¹ Section 19 a.)-b.) of Act LXXX of 2007 on Asylum.

² Council Directive 2001/55/EC of 20 July 2001 on minimum standards for giving temporary protection in the event of a mass influx of displaced persons and on measures promoting a balance of efforts between Member States in receiving such persons and bearing the consequences thereof [2001] OJ L 212/12, available [here](#).

³ Council Implementing Decision (EU) 2022/382 of 4 March 2022 establishing the existence of a mass influx of displaced persons from Ukraine within the meaning of Article 5 of Directive 2001/55/EC, and having the effect of introducing temporary protection [2022] OJ L 71/1, available [here](#).

⁴ Section 12 of TP Decree.

Title (EN)	Original Title (HU)	Web Link
Act LXXX of 2007 on Asylum (Asylum Act)	2007. évi LXXX. törvény a menedékjogról	https://bit.ly/3RgsYea (HU)
Government Decree No.301/2007 (XI. 9.) on the implementation of Act LXXX of 2007 on asylum (Asylum Decree)	301/2007. (XI. 9.) Korm. rendelet a menedékjogról szóló 2007. évi LXXX. törvény végrehajtásáról	https://bit.ly/3fUA0DK (HU)
Government Decree No. 86/2022. (III. 7.) on rules applicable in state of danger and related to persons recognized as eligible for temporary protection, and on derogations from the rules of: Act CVI of 2011 on public employment, on the amendment of acts related to public employment and of other acts (TP Decree)	86/2022. (III. 7.) Korm. rendelet az ideiglenes védelemre jogosultként elismert személyekkel kapcsolatos veszélyhelyzeti szabályokról, továbbá a közfoglalkoztatásról és a közfoglalkoztatáshoz kapcsolódó, valamint egyéb törvények módosításáról szóló 2011. évi CVI. törvény szabályainak eltérő alkalmazásáról	http://bit.ly/3JyzV8u (HU) Unofficial EN translation by the HHC: https://bit.ly/3XLoHSs
Government Decree No. 95/2022 (10.III.) on the performance of the humanitarian tasks of the Budapest and county defence committees	95/2022. (III. 10.) Korm. rendelet a megyei, fővárosi védelmi bizottságok humanitárius feladatai ellátásáról	http://bit.ly/3ReZD3Z (HU)
Government Decree No. 104/2022 (12.III.) on the support of providing accommodation to persons arriving with respect to a humanitarian disaster in a neighbouring country during the state of danger, and on other related (financial support for entities offering accommodation to Ukrainians)	104/2022. (III. 12.) Korm. rendelet a veszélyhelyzet ideje alatt a szomszédos országban fennálló humanitárius katasztrófára tekintettel érkező személyek elhelyezésének támogatásáról és az azzal kapcsolatos egyéb intézkedésekről	http://bit.ly/3Y9mpMY (HU)
Government Decree No. 106/2022 (12.III.) on certain rules related to the employment of and benefits to persons recognized as beneficiary of temporary protection and on the amendment of Government Decree 301/2007. (XI. 9.) on the implementation of act LXXX of 2007 on Asylum, with respect to a humanitarian disaster in a neighbouring country during the state of danger	106/2022 (III. 12.) Korm. rendelet a veszélyhelyzet ideje alatt szomszédos országban fennálló humanitárius katasztrófára tekintettel, az ideiglenes védelemre jogosultként elismert személyek foglalkoztatásával és juttatásaival kapcsolatos egyes szabályokról, valamint a menedékjogról szóló 2007. évi LXXX. törvény végrehajtásáról szóló 301/2007. (XI. 9.) Korm. rendelet módosításáról.	http://bit.ly/3HH9Anz (HU)
Government Decree No. 147/2022 (14.IV.) on the provision of childcare services to accompanied children who have arrived from the territory of Ukraine, with respect to the state of danger	147/2022 (IV. 14.) Korm. rendelet a veszélyhelyzetre tekintettel az Ukrajna területéről kísérővel érkezett gyermekek gyermekfelügyelettel történő ellátásáról	http://bit.ly/3RflCb0 (HU)
Government Decree No. 171/2022 (29.IV.) on certain issues of data	171/2022. (IV. 29.) Korm. rendelet az ukrajnai válsággal összefüggő egyes, az	http://bit.ly/3Juqqr0 (HU)

processing relevant to health care services, related to the Ukrainian crisis	egészségügyi ellátást érintő adatkezelési kérdésekről	
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There are no official statistics available regarding the number of those who were displaced directly or indirectly by the conflict present in Ukraine but that do not come under the scope of TPD in Hungary, however two groups are worth mentioning in this context.

A possibly significant number of Hungarian-Ukrainian dual citizens residing in Ukraine fled to Hungary as a result of the war. For reasons of historical specificity, around 150,000 ethnic Hungarians live in the **Zakarpattia** Oblast region in Ukraine, close to the Hungarian border.⁵ Although there is no official data as to the number of those who hold both Hungarian and Ukrainian citizenship within the group of ethnic Hungarians, according to the 2015 data of the Hungarian Central Statistical Office, 88,339 persons were living in Ukraine with Hungarian citizenship,⁶ and it might be assumed that most of them belong to the Hungarian minority. Naturally, after 24 February 2022, dual citizens and Hungarian-speaking Ukrainians also started to flee to Hungary, primarily from the **Zakarpattia** region. These people, however, did not fall under the Asylum Act and temporary protection scheme due to their Hungarian citizenship. At the same time, most of them could not enjoy all the rights to which Hungarian citizens are entitled, since most of those rights are tied to Hungarian social security status and registered address. Therefore, the TP Decree activating the application of the TPD and Council Decision introduced a special provision concerning dual citizens by stating that all benefits and advantages that are granted to a temporary protection beneficiary are to be granted to Hungarian citizens who had a permanent residence in Ukraine and arrived from Ukraine on or after 24 February 2022, unless they are granted more favourable treatment by virtue of their Hungarian citizenship.⁷ This means in practice that dual citizens may access reception conditions and financial support (see Status and residence and Housing) in the same manner as temporary protection beneficiaries (see [Residence Permit](#)). Although there is no official data as to the numbers of Hungarian-Ukrainian dual citizens residing in Ukraine fled to Hungary as a result of the war, but based on the information the Hungarian Helsinki Committee (HHC) received from the Ministry of National Economic, 32. 061 requests for financial support were submitted by dual citizens to competent government authority between February 2022 and 31 December 2024.⁸ This figure is, of course, only indicative regarding the number of dual citizens who wished to claim financial assistance under the TP scheme, but there is no official information on the exact number of dual citizens who fled from Ukraine to Hungary for the war.

Although the number may be lower than that of dual citizens, a group of indirectly displaced people that fall outside of the scope of TPD but that must be highlighted is that of Russian nationals staying in Hungary without (more permanent) legal basis who, having strong anti-war sentiments or fearing military conscription and/or the negative consequences of the newly adopted anti-LGBTQ law, do not want to return to Russia, but have no permanent basis to stay in Hungary either. The HHC provided legal assistance to 4 such Russian nationals in 2022 and 9 such Russian nationals during 2023 and 2024. These clients generally wish to claim asylum, but currently it is not possible to submit an asylum application directly in Hungary, only if it is preceded by the so-called embassy procedure initiated at the Hungarian embassy in Ukraine or Serbia (see [General Report – Embassy Procedure](#)). No such asylum procedures have been initiated with the help of HHC, however, in 2023, 6 Russian asylum-seekers were transferred to Hungary under the Dublin Regulations - generally for having been issued with a Hungarian tourist visa earlier - and have been represented by the HHC. In these cases, it was possible to submit the

⁵ Krisztina Lajosi, 'Disinformation, Digital Nationalism and the Hungarian Minority in Ukraine', 25 April 2022, available [here](#).

⁶ Hungarian Central Statistical Office, *New Hungarian Citizens. Changes following the introduction of simplified naturalisation procedure (Új magyar állampolgárok. Változások az egyszerűsített honosítási eljárás bevezetése után)*, 2017, available [here](#).

⁷ Section 8 of TP Decree.

⁸ Information received from the Ministry of National Economic on 19 February 2024 and 11 February 2025 by the HHC.

asylum applications. In 5 cases, following a judicial review procedure, the asylum application was refused, notwithstanding the applicants' strong anti-war sentiments.⁹ In the one remaining case, also following a judicial review procedure, the judge instructed the asylum authority to conduct a repeated procedure and grant refugee status for the applicant due to his well-established fear of persecution for being a member of LGBTQ community and facing real risk of conscription despite opposing the war.¹⁰ The applicant was accordingly granted refugee status in the repeated procedure conducted by the asylum authority.¹¹

As to 2024, the HHC is aware of one case of a gay Russian man who was transferred to Hungary under the Dublin procedure and he claimed asylum for his sexual orientation and anti-war sentiments. In his case the authority rejected the asylum application, however, in the judicial review procedure, the judge instructed the authority to conduct a new procedure and to grant refugee status to the applicant. Worryingly, in a case represented by the HHC 2024, a bisexual male of military age, who was also a political activist, was expelled to Serbia by the aliens policing authority, without any assessment of non-refoulement.¹² Serbia, as the destination country of expulsion was designated for the fact that the applicant mentioned in a hearing on their case that, instead of returning to Russia, he might be able to be admitted to Serbia. However, he also declared he had no assurance he could secure long-term stay in said country. The applicant presented an appeal against the expulsion decision with the assistance of the HHC, but the court did not change the authority's decision, and argued that it was not necessary to examine non-refoulement and the possibility of chain-refoulement regarding Serbia, accepting that the appellant statements could be regarded as undertaking voluntary departure for Serbia.¹³ The HHC represented 6 other Russian nationals who previously lived in Ukraine, reached Hungary to flee the war. Two of them, who had permanent residence permits in Ukraine, managed to obtain temporary protection in Hungary, due to the court holding that there was not any other 'adequate protection' available for them apart from temporary protection (for the details of their cases see section B, [Qualification for temporary protection](#)) Others who lived in Ukraine but did not have valid permanent residence permits when coming to Hungary generally had difficulties to either obtain temporary protection status or claim asylum (see [Qualification for temporary protection](#)) and, as a result, they face(d) the risk of being expelled to Russia.

There is no data available as to how many individuals potentially entitled to temporary protection are present in Hungary. The only somewhat relevant data in that regard is the number of individuals entering from Ukraine to Hungary. According to UNHCR, as of 22 April 2025, 6,397,855 people crossed the Ukrainian- Hungarian border since 2022 February 24.¹⁴ However, this number also includes the daily cross-border commute of people living in one country and working in the other.

As regards applicants and beneficiaries, there were:

- ❖ 39,168 temporary protection beneficiaries on 31 December 2024.
- ❖ 395 pending temporary protection applications on 31 December 2024.
- ❖ 33,273 individuals registered for temporary protection between 25 February and 31 December 2022¹⁵ ; in 2023, 7, 776 applications were registered and, in 2024, 8, 070.¹⁶
- ❖ Between 24 February 2022 and 31 December 2024, 1, 597 individuals who registered for temporary protection but because of the procedure and for the applicability of non-refoulement received tolerated status instead of temporary protection status.¹⁷

⁹ Case numbers 106-M-886/2023, before the asylum authority, Judgments of Budapest Court nr. 14.K.704.358/2023. and 14.K.704.364/2023.

¹⁰ Judgment nr 106.K.700.709/2023 of Court of Metropolitan Area of Budapest of 12 September 2023.

¹¹ Decision of the NDGAP of 04.04.2024 in case nr. 106-M-45386/2023.

¹² Case nr. 106-1-28740/2024-ké.

¹³ Judgment nr. 48.K.701.728/2024/22 of 3.07.2024. of the Budapest Court.

¹⁴ [Situation Ukraine Refugee Situation](#).

¹⁵ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023.

¹⁶ Data received from the National General Directorate of Aliens Policing by the HHC on 19 February 2024 and 20 February 2025.

¹⁷ *Ibid*.

Applicants and beneficiaries			
	As of 31 December 2022	As of 31 December 2023	As of 31 December 2024
Individuals registered for TP	33,273	41,049	49,119
Pending TP applications	1,083	460	395
TP beneficiaries	28,908	33,882	39,178
Tolerated status beneficiaries	923	1,597	1710

Source: regarding 2022, data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023; regarding 2023, data received from the National General Directorate of Aliens Policing by the HHC on 19 February 2024; regarding 2024, data received from the National General Directorate of Aliens Policing by the HHC on 19-20 February 2024.

B. Qualification for temporary protection

Currently, in line with the Council Implementing Decision, the TP Decree provides that the following persons may apply for temporary protection:

- a. Ukrainian nationals residing in the territory of Ukraine before 24 February 2022;
- b. stateless persons, and nationals of third countries other than Ukraine, who benefited from international protection (for example, having a refugee status) or equivalent national protection in Ukraine before 24 February 2022; and
- c. family members of persons referred to in points a) and b).

The following persons shall be considered as family members: spouses, minor children, and other close relatives who lived together as part of the family before 24 February, and who were wholly or mainly dependent on a person referred to in point a) or b) at the time.

In practice, the Hungarian asylum authority also grants temporary protection to the unmarried partner living in a stable relationship with a person referred to in point a) or b), and to third-country nationals who are the parents of minors referred to in point a) or b).¹⁸

When it comes to the interpretation of “dependency”, in the practice of both the National Directorate-General of Aliens Policing¹⁹ and the courts, a permissive and a restrictive approach may be highlighted.

The notion was interpreted in a restrictive manner in a case where the court upheld the decision of the NDGAP refusing the temporary protection applications of a Russian mother and her daughter, who had lived together in the same household with the mother's Ukrainian mother for 27 years before fleeing to Hungary, in a property owned by the Ukrainian mother. The court held that “dependency can only be understood as a relationship of responsibility and burden which is complete or close to it, or close to financial dependence, or personal care or nursing which is equivalent in its closeness to full or near-full financial dependence. If merely the emotional attachment, living together and running a household together would suffice as a status for a family member, the EU and national legislator would have provided for this, rather than much stricter dependency-dependency relationship.”²⁰ The Russian women were later granted temporary protection in 2024, but not for their dependency with their Ukrainian relative, but

¹⁸ Practice-based observation by the Hungarian Helsinki Committee, April 2023.

¹⁹ Hereinafter: NDGAP.

²⁰ Judgment nr. 11.K.703.874/2022/8 of Budapest Court, 9 January 2023.

because of the court holding that there was not any other ‘adequate protection’ available for them apart from temporary protection.²¹

Conversely, the NDGAP applied a permissive approach concerning a Belarusian citizen temporary protection applicant, also represented by the HHC.²² The applicant's mother is a Belarusian citizen, her half-sibling sister, however, is Ukrainian as she was born from a Ukrainian father. The mother and the applicant lived in Ukraine for more than 20 years, they also got a Ukrainian permanent residence permit in 2017. The sister, since she was born, also lived with her mother and half-brother all her life, in a house that is owned by the applicant. The mother and the sister were granted temporary protection status without any problems, but in the applicant's case the NDGAP wanted further evidence. The authority accepted that dependency was established between the applicant and the sister, as the sister, who is a minor, had lived in the applicant's apartment and they had a strong emotional connection too. The Belarusian applicant was consequently granted temporary protection status.

The ‘*direction*’ of dependency is also interpreted by the NDGAP in a permissive manner. The HHC knows of two cases of Nigerian citizen parents, whose children were born in Ukraine and therefore had Ukrainian citizenship, but the NDGAP eventually granted temporary protection not only to the children but to their parents too.²³

Furthermore, it is worth noting that following the litigation efforts of the HHC, the Budapest Court stated that a third-country national family member of a dual (Hungarian-Ukrainian) citizen shall also be granted temporary protection status, notwithstanding the fact that the family member is not entitled to and does not need temporary protection for being a Hungarian citizen. The court argued that the legislator obviously did not want to place the third-country family members of Hungarian citizens who had lived in Ukraine in a less favourable position than the third-country family members of Ukrainian citizens who may be granted asylum status under the TP decree.²⁴

The Asylum Act, in line with the TPD, also sets out the grounds of exclusion from temporary protection. No temporary protection shall be granted when there are reasonable grounds to believe that the person had committed:

- a. a crime against peace, a war crime or a crime against humanity as defined in international instruments;
- b. a serious, non-political criminal act outside the territory of Hungary prior to the submission of the application for recognition as a beneficiary of temporary protection;
- c. a crime contrary to the purposes and principles of the United Nations.

Moreover, no temporary protection shall be granted to persons whose stay in the territory of Hungary violates the interest of national security and/or:

- a. in whose case a court established by a final and binding judgement that they had committed an intentional criminal offence punishable by imprisonment for five or more years;
- b. who are sentenced by a final and binding judgement of a court to imprisonment for having committed a criminal offence as recidivists, multiple recidivists or violent multiple recidivists;
- c. who are sentenced by a final and binding judgement of a court to imprisonment of a term of three years or more for having committed a criminal offence against life, physical integrity, and health, a criminal offence endangering health, a criminal offence against human freedom, a criminal offence against the freedom of sexual life and sexual morality, a criminal offence against public

²¹ Judgments 13.K.700.905/2024.16 of 29 April 2024 and 11.K.704.104/2023/15 of 9 April 2024 of Budapest Court.

²² Case number 106-M-26231/2022 before the NDGAP.

²³ Case number 106-M-6958/2022 before the NDGAP.

²⁴ Judgment nr 13.K.700.433/2023/7 of Budapest Court, 30 March 2023.

peace, a criminal offence against public safety, or a criminal offence against the order of public administration.²⁵

The Constitution Protection Office and the National Counterterrorism Centre are the competent expert authorities to determine whether the stay of the applicant in the territory of Hungary presents a threat to national security.²⁶

Issues related to the temporal scope and date of arrival in Hungary

Although the Commission strongly encouraged member states to extend TP to those who fled before 24 February 2022, the Hungarian Government decided not to do so regarding those, who would otherwise belong under the personal scope of the TP Decree but reached the country before the said date. Depending on whether or not these individuals arrived in the country either shortly or a long time before 24 February 2022 and have no legal basis to stay (e.g., application for or extension of residence permit for a defined purpose) they may be subjected to the following procedures.

Firstly, if the person arrived in Hungary shortly before 24 February (1-3 weeks), temporary protection applications can be submitted, despite the fact that based on the TP Decree, the applicant is not eligible for the protection status. According to the experience of HHC lawyers, the authority registers these applications and conducts the TP procedure, but as a result, the application is rejected in an official decision. Nonetheless, the asylum authority, acting under the Asylum Act and Asylum Decree, also holds in these cases that *non-refoulement* is applicable and that the applicant cannot be sent back to their country of origin (Ukraine). Consequently, the asylum authority grants tolerated stay/exile status to these applicants.²⁷ For the duration of the procedure, the applicant is issued with a humanitarian residence permit granting the right to stay and reside in the territory of the country. The same permit, valid for a year, is granted to those who are granted tolerated status.²⁸ After a year, the status is reviewed by the asylum authority.²⁹ There have been no reports suggesting that those receiving tolerated status would have experienced any difficulties with regard to the status-review procedure.

Tolerated status ensures much less rights than the temporary protection status or any international protection status. Persons with tolerated status shall be entitled to:

- ❖ pre-school and are obliged to participate in public education,³⁰
- ❖ be a private entrepreneur,³¹
- ❖ be employed, but only after obtaining a work permit,³²
- ❖ in case they are not insured under the social security scheme, to treatments by a general practitioner, to emergency care, to mandatory vaccinations and to certain epidemics related health care services.³³

However, if the person arrived in Hungary long before 24 February 2022 and stays without any legal basis, an expulsion procedure might be initiated either *ex officio* by the NDGAP or by the person's own initiative, if the person presents themselves before the authority.³⁴ In this case, the aliens policing authority

²⁵ Section 21(1) of the Asylum Act.

²⁶ Point a) of Section 2/A. of Government Decree 301/2007. (XI. 9.) on the implementation of Act LXXX of 2007 on Asylum (Asylum Impl. Decree).

²⁷ Sections 25/A-25/B of Asylum Act.

²⁸ Section 29 (1) b.) of Act II of 2007 on the Entry and Stay of Third-Country Nationals.

²⁹ Section 25/B (2) Asylum Act.

³⁰ Section 92(1) a.) of the Public Education Act.

³¹ Section 3(1) d.) of the Private Entrepreneurs Act.

³² Sections 3-6 of Gov. Decree 445/2013. (XI. 28.).

³³ Section 44 (3)-(4) of the Asylum Decree.

³⁴ Section 42 of Act II 2007 on the Entry and Stay of Third-Country Nationals (effective till 29 February 2024), Sections 97 (1) and 98 (1)b.) of Act XC of 2023 on the General Rules of the Entry and Stay of Third-Country Nationals (effective from 1 March 2024).

would conduct a procedure in which they have an obligation to assess whether *non-refoulement* applies. In case of persons fleeing Ukraine, the aliens policing authority would likely perceive that the principle of *non-refoulement* may be applicable and the person in question may be granted tolerated stay / exile status³⁵ (see above). This procedure is likely to be conducted not only regarding those who would otherwise be eligible for temporary protection, but arrived in Hungary long before 24 February 2022, but also for all third country nationals not covered by the personal scope of the TP Decree, but are unable to return to their countries of origin in a safe and durable manner, regardless of the time of their arrival in the country. The situation is as such because the Transitional Act precludes applying for asylum without going through the embassy procedure.

The HHC in its information requests sent to the NDGAP asked whether, beside a rejection of a temporary protection application and/or asserting the non-applicability of *refoulement*, anyone who applied for temporary protection was issued with an expulsion order. The NDGAP stated in its answer that no temporary protection applicant was expelled throughout 2022, 2023 or 2024 as a result of a negative decision in a temporary protection procedure.³⁶

Scope of protection and procedures applied to third country nationals and stateless persons

Persons recognised as stateless in Ukraine – without having benefited from international or equivalent protection in Ukraine prior to 24 February 2022, as the unfortunate wording of the Council Decision and TP Decree perhaps suggest – are covered by the TP Decree and are eligible for temporary protection according to the communication of the asylum authority.³⁷ The personal scope of the TP Decree was not broadened to cover additional categories of displaced persons however.

Nonetheless, the Hungarian implementation of the Council Implementing Decision poses some compliance issues with regard to third country nationals and stateless persons. Although the Council Implementing Decision requires Member States to provide temporary protection or adequate protection to those stateless persons and third-country nationals, who were legally residing in Ukraine before 24 February 2022 on the basis of a valid permanent residence permit and are unable to return to their country of origin in a safe and durable manner, the TP Decree states that “it does not apply the Council Decision” with regard to that group of people. According to the TP Decree, the aliens policing authority shall proceed in line with the general rules in the cases of these individuals.³⁸ This ‘general’ procedure can either mean a residence permit procedure or an aliens policing procedure aiming at the person’s expulsion but may result in granting tolerated status, as explained in the previous paragraph.³⁹ Neither the residence permit procedure, for which the applicant has to fulfil a long list of conditions (e.g., proven income, health-insurance etc.) nor tolerated stay may qualify as ‘adequate protection’ within the meaning of Council Implementing Decision.⁴⁰ Those third-country nationals who were residing in Ukraine but would be able to return to their countries of origin in a safe and durable manner are likely expelled as a result of an alien policing procedure, should they not be able to obtain a residence permit for a specific purpose.

For the duration of the aliens policing procedure persons are provided with a temporary residence document by the aliens policing authority valid for 1 to 3 months. The rules related to the temporary

³⁵ Sections 52-52/A of Act II of 2007 on the Entry and Stay of Third-Country Nationals.

³⁶ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023 and on 19 February 2024 and 20 February 2025.

³⁷ NDGAP, ‘Tájékoztató az Ukrajnából menekülő ukrán állampolgárok részére’, available in Hungarian [here](#).

³⁸ Section 2 (2)-(3) of Government Decree No. 86/2022. (III. 7.) (TP Decree).

³⁹ These procedures are regulated by Act II of 2007 on the Entry and Stay of Third-Country Nationals.

⁴⁰ Adequate protection as defined in the Commission’s document: European Commission, *Communication from the Commission on Operational guidelines for the implementation of Council implementing Decision 2022/382 establishing the existence of a mass influx of displaced persons from Ukraine within the meaning of Article 5 of Directive 2001/55/EC, and having the effect of introducing temporary protection* [2022] OJ C 126/1, available [here](#).

residence document are laid down in the TCN Act.⁴¹ The temporary residence document, with which does not come with any right apart from being able to stay in the country for the time of the procedure, may be extended by a maximum of three additional months at a time, if the person in question is able to prove that travel arrangements to their country of origin are underway or that they made efforts to regularise their stay in Hungary on the long term (such as proceeding with a visa application to another country or a correspondence with a Hungarian University proving that the person wished to obtain a residence permit for a studying purpose). Temporary residence documents are also provided to third-country nationals fleeing Ukraine by the police upon border crossing. The aliens policing authority can later extend these as explained earlier. The NDGAP states that 21,552 temporary residence documents were issued between 24 February 2022 and 31 December 2024.⁴²

In the long term, the regularisation of the residence of non-Ukrainian nationals arriving from Ukraine could be possible only by applying for one of the residence permits set out by the TCN Act (for example, permit for the purpose of studies, employment, family reunification, etc.) if the appropriate legal basis is available to the applicant (for example, he or she is admitted to a university, has a job-offer, etc.) and if they fulfil a long list of conditions (e.g. verifying place of accommodation, means of subsistence, health insurance). Applications for such residence permits must be submitted, as a general rule, at the embassies of Hungary. Accordingly, applicants must explicitly request, by submitting a leniency request, that the authorities allow the submission of the application within the territory of Hungary, providing specific reasons. Unfortunately, the HHC's 2022-2023 experience shows that the mere fact that someone is in the territory of Hungary due to the conflict in Ukraine is not considered as an acceptable basis for the leniency request by the authorities. In 2024, the HHC did not encounter similar situations.

Summary of available protection and residence statuses for people fleeing Ukraine

As explained in the previous paragraphs, the Hungarian implementation of the EU TP scheme is rather restrictive in terms of eligibility for protection. Apart from Ukrainian nationals, beneficiaries of international protection or stateless persons recognised in Ukraine and their family members, no other groups can access temporary protection. Although it follows from the TPD, the Council Implementing Decision and the Commission's operational guidelines that third-country nationals who are unable to return to their country of origin but are not eligible for temporary protection must be able to access the general asylum procedure, Hungarian law precludes the submission of asylum applications in Hungary, unless the procedure is initiated in **Serbia** or **Ukraine**, by submitting a so-called statement of intent declaration at the Hungarian embassies.⁴³ This regulation, in addition to being in breach of international law and European Union law related to persons entitled to international protection in several aspects, as confirmed by the Court of Justice of the European Union in June 2023,⁴⁴ has posed serious difficulties within the context of the Ukrainian crisis as well (see [Access to Asylum](#)). Third-country nationals arriving from Ukraine either do not know that they should lodge statement of intent procedure at the Hungarian Embassy in **Kyiv** and wait to be granted leave to enter and come to Hungary, or do not hold the necessary visa to travel to **Serbia**, and therefore, are not in a position to submit a statement of intent at the Belgrade embassy. Even if these individuals have well-founded asylum claims, the 'best' they can get is a tolerated status as a result of an alien policing procedure (see above, same section).

⁴¹ Section 30 of TCN Act.

⁴² Information received from the NDGAP by the HHC on 20 February 2025. The statement of the NDGAP does not explicitly say that the documents were issued exclusively for third-country nationals, it only says for 'people arriving from Ukraine'.

⁴³ Chapter 84 of Act LVIII of 2020 on the transitional rules related to the termination of the state of danger and on the epidemic preparedness (Transitional Act).

⁴⁴ CJEU, 22 June 2023, *European Commission v. Hungary*, C-823/21, available [here](#).

The HHC in its information request sent to the NDGAP asked how many third-country nationals fleeing Ukraine to Hungary and issued with a temporary residence document applied for asylum in Hungary. The NDGAP stated that they do not have data in that regard.⁴⁵

The available forms of protection, residence statuses and their compliance with the EU TP scheme are summarised here:

Groups fleeing Ukraine	Protections / Residence status	Is it compliant with the EU TP scheme?
<ul style="list-style-type: none"> - Ukrainian nationals, - Recognised stateless persons and beneficiaries of international protection, - their family members within the council Decision + their partners in a stable relationship, parents of Ukrainian minor <p>if arrived on or after 24/02/2022</p>	Temporary protection granted in asylum procedure	Yes
<ul style="list-style-type: none"> - Ukrainian nationals, - Recognised stateless persons and beneficiaries of international protection, - their family members within the council Decision + their partners in a stable relationship, parents of Ukrainian minor <p>if arrived before 24/02/2022</p>	Tolerated status or residence permit granted as a result of an alien policing procedure	Yes
TCNs legally residing in Ukraine on a permanent basis if they cannot return to their country of origin in a safe and durable manner	Tolerated status or residence permit granted as a result of an alien policing procedure	No, as neither TP nor adequate protection provided.
TCNs legally residing in Ukraine on a short-term basis if they cannot return to their country of origin in a safe and durable manner	Tolerated status or residence permit granted as a result of an alien policing procedure	Yes
All TCNs who are able to return to their country of origin in a safe and durable manner	No protection, are channelled to the alien policing procedure (result: expulsion or if applied	Yes

⁴⁵ Information received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023 and on 19 February 2024.

	and conditions fulfilled – residence permit)	
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All residence permits issued in 2022 and 2023 were valid until 4 March 2024. As the EU temporary protection was extended, 343/2024 Government Decree (XI. 14) also declared the prolongation of the Hungarian TP cards' validity until 4 March 2026.

C. Access to temporary protection and registration

1. Admission to territory

Access to the territory of Hungary was generally facilitated at border crossing points in 2022, with the occasional exceptions listed below. In line with the Commission Communication providing operational guidelines for external border management to facilitate border crossings at the EU-Ukraine borders,⁴⁶ the application of entry bans/SIS alerts on prohibition of entry and stay in the EU has been suspended on the Ukrainian-Hungarian border and people could enter without adequate travel documents in 2022. Although the said EC guideline encourages Member States to issue an arrival declaration and/or (provisional) travel documents to those not having valid travel documents, Hungary did not follow this practice. According to the Hungarian Act on Asylum, however, beneficiaries of temporary protection are entitled to request a single exit and entry document, if they do not hold a valid travel document issued by their country of origin.⁴⁷ Furthermore, there are no reports or testimonies suggesting that any person fleeing from Ukraine was refused entry at the Ukrainian-Hungarian border crossing points in 2022. Ukrainians without biometric passports or other travel or identification documents, as well as third-country nationals without travel documents, and even those against whom an entry ban concerning Hungary, or the EU was issued were all granted entry to Hungary after 24 February 2022.

The situation of persons fleeing Ukraine but trying to enter the Schengen area via Hungary at Romanian-Hungarian border-crossing points, however, was not as clear-cut. The HHC received information on multiple occasions between 24 February 2022 and August 2022, that Ukrainians without biometric passports or third-country nationals, even holding a Ukrainian residence permit, were not allowed to enter Hungary. This practice was, nonetheless, rare and not consistent. In the second half of 2022, no organisations contributing to this report received such information.⁴⁸ In 2023-2024, only those fleeing Ukraine could enter Hungary from Romania, who had valid Ukrainian biometric passports or a document issued by other Schengen state confirming that the person may enter that state.⁴⁹ The Police states that in 2024 in case of 300 Ukrainian nationals, entry was denied for unspecified reasons.⁵⁰

However, since January 2023, border-control measures have been strengthened. Terre Des Hommes Hungary received information via informal, non-state channels, that in some instances only those who have biometric passports are allowed to leave Ukraine by the Ukrainian border police.⁵¹

- ❖ On 23 January 2023 staff members of the HHC monitoring the border area received disturbing information with regard to a Turkish citizen who tried to enter Hungary with his Ukrainian wife and child but was refused entry by the border guards. An official decision of refusal of entry was also

⁴⁶ Commission Communication Providing operational guidelines for external border management to facilitate border crossings at the EU-Ukraine borders 2022/C 104 I/01 [2022] OJ C 104I/1, available [here](#).

⁴⁷ Section 22(1) b.) of Asylum Act.

⁴⁸ The following organisations contributed to this report: IOM Hungary, Caritas Hungarica, Cordelia Foundation, Evangelical Lutheran Diakonia, Jesuit Refugee Service, Hungarian Interchurch Aid, Hungarian Maltese Charity, Hungarian Reformed Church Aid, Menedék Hungarian Association for Migrants, and Next Step Hungary Association.

⁴⁹ Information received by the HHC during its February 2023 monitoring mission.

⁵⁰ Information received from the Police Headquarter on 20 February 2024 by the HHC.

⁵¹ Information received from Terre Des Hommes Hungary on 28 January 2023.

made by the border police, referring to the fact that the said individual did not hold the necessary visa to enter. The next day the HHC staff members attended a coordination meeting organised by locally present actors in **Záhony**, where the representative of the Hungarian Defence Forces informed attendees that, by instruction of the Hungarian National Police Headquarters, border guards would more thoroughly check whether the person intending to cross the border stayed in Ukraine in a lawful manner prior to 24 February 2022.

- ❖ On 24 January 2023, the HHC attorney was present at the local border police station of Záhony where he witnessed that two third-country nationals, an Iranian and a Nigerian student, were refused entry in a formal decision. One of the students had a valid residence permit in Ukraine, the other student's residence permit had expired. In both of their cases the decisions stated that they did not hold the necessary visa. The acting border police officer informed the HHC attorney that the police contacted the asylum authority to obtain *non-refoulement* opinions concerning the said third-country nationals. The decision otherwise made no reference to their Ukrainian residence status. The border police later withdrew the decision and the HHC attorney was informed that the said nationals were allowed to enter Hungary.
- ❖ The same day (24 January 2023), seven Indian nationals were allowed to enter Hungary without their IDs having been thoroughly checked.
- ❖ On 25 January 2023, a Ukrainian lawyer reached out to the HHC, stating that the entry of 4 Pakistani nationals into Hungary was denied. According to the lawyer's information, formal entry-refusal decisions were again issued with reference to the fact that the individuals did not hold a valid visa to enter Hungary. The Pakistani nationals' stay in Ukraine was, however, illegal.

Throughout February 2023, the HHC registered further cases where the entry of third-country nationals, legally or illegally staying in Ukraine, were denied by the Hungarian border police at **Záhony**. This practice affected family members of Ukrainian nationals too, who would otherwise be entitled to temporary protection. IOM has also suggested that 'certain patterns that have emerged strictly based on observation and second-hand information indicate the denial of entry for TCNs based on whether they had previously exited Ukraine or not, with TCNs exiting for a second or third time the country, not being allowed to do so again and sent back. In addition, cases with Temporary Protection status in EU countries, other than Hungary, have also been denied entry into the country.'⁵²

These cases might indicate that a worrisome and inconsistent practice concerning the entry of third-country nationals to Hungary is evolving. The HHC reached out to the Hungarian National Police Headquarters by sending them a freedom of information request in which the HHC inquired about the existence of an internal policy or law according to which entry at the border is decided. The National Police Headquarter in its answer received by the HHC on 27 March 2023 asserts individuals in the following situation will be granted entry:

- ❖ those who comply with Article 6 of the Schengen Border Code (SBC), in other words, who have the necessary and valid travel documents (e.g., visa, passport);
- ❖ in the absence of fulfilling the requirements of Article 6 of SBC, those are not under the effect of an entry ban issued:
 - for national security reasons;
 - issued by any other Schengen member state;
 - those with public order or public security reference.Those with an entry ban issued as defined here are denied entry and are returned.
- ❖ In the absence of fulfilling the requirements of Article 6 of SBC, those third-country nationals who did not enter Ukraine after 24 February 2022.

⁵² Information received from the IOM by the HHC on 14 February 2022.

The Police Headquarter also stated in its answer that if need for asylum or temporary protection is indicated when crossing the border, 'when assessing *refoulement*, this need has to be indicated to the NDGAP'. The Police furthermore stated that 'if *non-refoulement* applies, the person is to be transferred to the **Nyírbátor** collection point and further procedure is then to be conducted by the NDGAP'. 'Outcome is uncertain as the NDGAP' – and not the border police – 'decides if the status is granted or the person is returned to Ukraine'. The letter furthermore asserted that 'if *non-refoulement* does not apply, then the person claiming must be directed to the Kiev Embassy of Hungary'.

The Police states that 1,538 persons were denied entry at the Ukrainian-Hungarian border in 2023 and 461 in 2024. In 2024, 1 persons was denied entry for lacking valid travel documents, 3 persons for using fake travel documents, 192 persons for missing a valid visa, 3 persons for using fake visas, 103 persons for lacking 'supporting documents',⁵³ 34 persons for overstaying⁵⁴ and 128 persons for being subjected to an entry ban.⁵⁵

The HHC registered the following refusal of entry cases at the Ukrainian border, at the Záhony border crossing point:

- ❖ 3 February 2023: Five Indian nationals claimed they had been in Ukraine (Odessa) with a study visa for three months. They arrived in Ukraine through Moldova. They claimed they wanted to travel back to India as Ukraine is not safe. The Moldavian visa they previously had expired, that is why they tried to travel back to India through Hungary. HHC was told by the Police that the Indian nationals had visited Moldova multiple times over the 3 months they spent in Ukraine. Their entry was refused.
- ❖ 18 April 2023: a Bangladeshi citizen was stopped and removed from the train arriving from Ukraine at the train station. He claimed that he wanted to join his Ukrainian wife and son, who were granted temporary protection and lived in Germany. The person's entry was refused due to the lack of EU visa.
- ❖ 29 April 2023: an Iraqi citizen wanted to go to Germany via Hungary to his wife and minor child who had Ukrainian citizenship. His entry was refused.
- ❖ 7 June 2023: Nigerian and Moroccan citizens were turned back by the authorities because they had already left Ukraine since the outbreak of the war and now wanted to leave again.
- ❖ 19 July 2023: An Azeri family of 4 persons (with two minor children) was denied entry by the border guards because they did not have valid visas.
- ❖ 03 August 2023: a Nigerian citizen woman, wanted to come to Hungary with her minor Ukrainian daughter was refused entry.
- ❖ 14-15 August 2023: One Ukrainian person was escorted for a hearing by the Police after arriving by train to Záhony, but as it turned out he had a Schengen ban on entry and stay issued by Hungary, so he was not allowed to enter Hungary.
- ❖ 13 September 2023: an Iranian citizen wanted to go to Austria via Hungary to join his Ukrainian citizen wife and their two minor children. His entry was refused.
- ❖ 7 February 2024: The Záhony border guards, denying entry to Hungary, escorted a 33-year-old Afghan man and his 8-year-old Ukrainian son into the official locality. The man's Afghan passport seemed to be expired. The Ukrainian authorities put a stamp in the passport, thus extending the validity of the passport until 2026. The border guards were not convinced that extending the validity of the passport in this way was official, but then the Hungarian authorities confirmed it was, so they were eventually allowed to enter Hungary.
- ❖ On three other occasions in 2024, third-country nationals (two Russian men and a Lebanese woman, all with Ukrainian family members) with expired travel documents were intercepted by the border guards and were escorted to the border guard premises. As these individuals

⁵³ It was not further specified what the Police meant by supporting documents.

⁵⁴ The context of 'overstaying' was not specified in the Police statement.

⁵⁵ Information received from the Police Headquarter on 19 February 2024 and 20 February 2025.

previously contacted the representative of HHC, who went to provide them with legal assistance. As a result, all the affected people were granted entry, but it is unpredictable what the outcome of the procedure would have been in the absence of legal representation.

The HHC has challenged this border control practice by requesting the judicial review of refusal on entry decisions. The HHC represents the above-mentioned Bangladeshi, Nigerian, Iraqi and Iranian citizens in these procedures. There have been 4 judgments issued so far in these cases. All judgments quashed the refusal of entry decisions due to inadequate *non-refoulement* assessment. The court, however, did not rule on whether or not the individuals in question would have been eligible for temporary protection, as it considered that there was no proof that temporary protection was requested.⁵⁶ According to the experience of the HHC, this is especially concerning as even if people arrive with a filled temporary protection application, this is not accepted and not recorded anywhere by the border guards. The judicial review procedure did not always provide an efficient remedy against the incomplete police decision: in one of the four cases mentioned herein, following the judicial order, the police issued a new decision, which was, however, the same as its previous decision, even the non-refoulement reasoning used. The HHC appealed again, but the court rejected the appeal saying that border police complied with the first judgement and included non-refoulement and that it was not possible to contest the quality of the opinion as it was not in the first appeal either. The HHC appealed to Kuria (Supreme Court of Hungary). The Kuria accepted the review and annulled the judgement,⁵⁷ but only on formal grounds, that the decision could not be issued with the same number and date as the annulled decision. The border police issued a new decision and wrote 2 additional sentences on the non-refoulement. The HHC appealed again, but the court rejected the appeal, with reference to the fact that the border police formally complied with the judgement.

In 2022, no information was received as to any difficulties relating to re-entering Hungary for those who returned to Ukraine and decided to come back. In 2023, however, those who have not been granted any status enabling residence/stay in Hungary (e.g., temporary protection status) but returned to Ukraine, were likely to face difficulties in re-entering Hungary. In 2024, no such occurrence was recorded by the HHC.

2. Freedom of movement

Ukrainian nationals with biometric passports are not issued with any kind of additional residence documents by the authorities upon their entry to Hungary. Ukrainians without biometric passports and third-country nationals are, however, provided with a temporary residence document valid for 1-3 months, until their residence status is otherwise settled or until they leave the country. According to the NDGAP, between 24 February 2022 and 31 December 2024, 21,552 temporary residence documents were issued.⁵⁸ The NDGAP, upon the person's arrival issues this document on humanitarian grounds,⁵⁹ but in the early phase of the crisis this document was also issued by the police at border crossing points and registration points (set up close to the border with the specific purpose of registering people from Ukraine who did not hold a biometric passport).

Furthermore, in the experience of the HHC, Hungary did not follow the EC's recommendations⁶⁰ indicating that if there is no biometric passport but the person is entitled to temporary protection and wants to move to another Member State other than the first Member State, then a Member State might issue 15-day

⁵⁶ Judgments of Debrecen Court nr 4.K.702.273/2023/7 of 5 December 2023. nr 4.K.701.177/2023/6 of 6 July 2023, nr 15.K.702.514/2023/5 of 9 January 2024 and nr. 18.K.702.659/2023/4 of 15 February 2024.

⁵⁷ Judgment of the Kúria nr Kfv.III.37.048/2024/5. of 28 February 2024.

⁵⁸ Information received from the NDGAP on 20 February 2025 by the HHC.

⁵⁹ Section 30 (1) f.) and j.) of TCN Act.

⁶⁰ Communication from the Commission on Operational guidelines for the implementation of Council implementing Decision 2022/382 establishing the existence of a mass influx of displaced persons from Ukraine within the meaning of Article 5 of Directive 2001/55/EC, and having the effect of introducing temporary protection (2022/C 126 I/01).

Schengen visa, persons wishing to travel further normally turned to the consulates of the targeted Member States and requested visas there. Third-country nationals not entitled for temporary protection generally did the same, especially in cases when they wanted to reach EU countries where the personal scope of temporary protection was broader and covered third-country nationals too.

3. Registration under temporary protection

The application for temporary protection has to be submitted to the asylum authority (NDGAP)⁶¹ in an official application form⁶². There is no deadline to apply for temporary protection after arriving in Hungary, however, if applicants want to access state-funded accommodation, it is advisable to apply within 30 days (see more on this under [Housing](#)). The application may be submitted at any asylum client services of regional offices⁶³ of the authority. In Budapest, it is to be lodged at 60 Budafoki Street, 11th District. Case-officers at the client services provide applicants with the application form. In addition, it is possible for applicants to give their personal identification data necessary for the submission of the application in advance by using the website⁶⁴ or mobile application⁶⁵ of the NDGAP for that purpose.⁶⁶ That possibility only exists to accelerate the procedure and does not exempt the applicant from the obligation to appear in person before the authority, which, in this case, may be fulfilled not only by showing up at the mentioned offices of NDGAP, but also at any government client service point ("Kormányablak").⁶⁷

It must be demonstrated upon submitting the application that the applicant falls within the personal scope of the Council Implementing Decision/TP Decree. In line with the EC communication, this might be done usually by presenting a passport, a personal identity card, any other document appropriate for the certification of personal identity, or, especially for family members, by an extract from the birth or marriage certificate substantiating family relationship.

As per the practice of asylum authority, unmarried partners of persons eligible for temporary protection may also be granted temporary protection. Partners have to evidence the relationship by submitting photos, email, SMS, other correspondence with the temporary protection-eligible partner. If the applicant holds valid travel or ID documents, the submission of the application is quite fast, without the case-officer asking additional questions.

The law also provides that the applicant is only to be heard if it is absolutely necessary for further clarification.⁶⁸ This is the case, for instance, when the applicant lacks any document sufficient for personal identification, as then the applicant might have to answer some additional questions or submit other evidence substantiating their identity. There are no documents which are not accepted in the course of making the application.

If, at the time of submitting the application, the applicant has no accommodation, that fact may be noted on the application form. In such cases, the asylum authority contacts the competent authorities (Disaster Relief) so that they may provide accommodation to the applicant. If the applicant has accommodation, the address must be given on the data sheet, and in case their accommodation changes during the procedure, the authority must be duly notified thereof.

The asylum authority does not adopt a separate decision about the recognition of temporary protection.

⁶¹ Section 32/D (1)-(2) of Asylum Act.

⁶² Application form may be downloaded from [here](#).

⁶³ The regional offices of the NDGAP are listed at NDGAP, 'Területi szervek illetékességi területe és címjegyzéke', available in Hungarian [here](#).

⁶⁴ The NDGAP website to submit applications is available [here](#).

⁶⁵ The NDGAP mobile application is available [here](#).

⁶⁶ Sections 2-3 of Government Decree 170/2022 (IV.28).

⁶⁷ (1)-(2b) of Section 5/A (1)-(2b) of Government Decree 86/2022. (III. 7.).

⁶⁸ Section 4 (2) of TP Decree.

The authority only records the recognition itself and notifies the applicant by handing over or posting the temporary protection document.⁶⁹ Rejected applicants are informed that their attempt was unsuccessful only if they contact the authority in person to request information about the assessment of their application.

The asylum authority has 45 days to conduct the procedure.⁷⁰ The time-limit set for the procedure of the expert authority⁷¹ (see [Qualification for temporary protection](#)) shall be 10 days, therefore, the maximum duration of the procedure is 55 days. If the expert authority does not notify the asylum authority of its decision within 10 days, its consent is considered as given.⁷²

Following the submission of the temporary protection application, applicants receive a so-called humanitarian residence permit for the duration of the procedure.⁷³ The permit certifies their entitlement to the services available for them during the temporary protection procedure (see [Residence Permit](#)). If the humanitarian residence permit expires before receiving the temporary protection document following the recognition, the extension of validity may be requested at the closest regional office of the NDGAP asylum-client service.

Following recognition as a beneficiary of temporary protection, a document is issued to the beneficiary for the purposes of personal identification and certification of the right to residence (temporary protection card). The authority sends/delivers a letter along with the temporary protection card notifying the beneficiary that the card does not entitle its holder to travel and that the subsistence allowance – the only financial support provided to beneficiaries by the state – can be requested after receiving the card. If, following the issuance of that document, the place of residence of the beneficiary of temporary protection changes, the authority must be duly notified thereof.⁷⁴

If the temporary protection application is submitted, and as a result of the procedure the asylum authority denies the protection claim and potentially expels the applicant, the refusal decision might be challenged before the regional court within 8 days from its delivery.⁷⁵ In the judicial review request, *non-refoulement* opinion and a potential expulsion decision might also be challenged. The court then has 60 days to decide in the case,⁷⁶ whether to refuse the appeal or order the asylum authority to conduct a new procedure.⁷⁷ The judicial review request does not have an automatic suspensive effect on the decision⁷⁸, but in practice the expulsion procedure never starts beforehand.

According to the asylum authority, 29 judicial review requests challenging the decision made as a result of a temporary protection procedure until 31 December 2022 were submitted.⁷⁹ In 2023, the number of judicial requests submitted was 21, and, in 2024, this number was 8.⁸⁰ Neither the asylum authority, nor the National Office for the Judiciary could provide data as to the outcome of the judicial review procedures.

Interestingly, when refusing the temporary protection application, the Asylum Act does not preclude the submission of a subsequent application as it does regarding general asylum claims. As a consequence, even if the factual basis of the application and circumstances of the applicant did not change, another application can be submitted and the authority has to make a new – presumably – refusing decision. However, as a result of a 2024 legislative change, if a person's temporary protection application is rejected

⁶⁹ Section 5/A (3) of Government Decree 86/2022. (III. 7.).

⁷⁰ Section 77 (3) of the Asylum Act.

⁷¹ The Constitution Protection Office and/or the National Counterterrorism Centre.

⁷² Paragraphs (2)-(3) of Section 4/A. of Government Decree 86/2022. (III. 7.).

⁷³ Section 29(1) c.) of the TCN Act and Section 6 (1) b.) of the Asylum Decree.

⁷⁴ Section 22(1) a.) of the Asylum Act.

⁷⁵ Sections 68 (1) and 79 (2) of Asylum Act.

⁷⁶ Section 68 (2) of the Asylum Act.

⁷⁷ Sections 88-89 of the Code on Administrative Litigation.

⁷⁸ Section 39 (6) of the Code on Administrative Litigation.

⁷⁹ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023.

⁸⁰ Information received from the NDGAP by the HHC on 19 February 2024 and on 20 February 2025.

and remedies are exhausted, the applicant will no longer be entitled to emergency accommodation and care for the duration of the new (repeated) procedure⁸¹, as it was the case throughout 2022 and 2023.

Lack of referral mechanism and information at entry points

There are no formally introduced measures to refer people arriving to the border to the responsible authority. After 24 February 2022, five registration points were set up in the border area, but they are no longer operational. Since around June 2022, only one registration point is working in **Záhony**.

At the same time with establishing the registration points, 6 helping points were also set up by the Government close to the Ukrainian-Hungarian border crossing points, where people who needed first-hand assistance for any reasons (e.g., accommodation, food provision, healthcare service, information, transfer), could get it. These helping points were operated by the Charity Council, a body working under the coordination of the State Secretary for Church and Minority Relation. Its members are the biggest and most influential public benefit charity organisations working in Hungary, namely the Caritas Hungarica, the Hungarian Reformed Church Aid, the Hungarian Maltese Charity Service, the Hungarian Interchurch Aid, the Hungarian Baptist Aid and the Hungarian Red Cross.⁸²

Each Charity Council member operated one helping point: Caritas Hungarica in **Barabás**, Hungarian Reformed Church Aid in **Záhony**, Hungarian Interchurch Aid in **Barabás**, Hungarian Baptist Aid in **Tiszabecs**, Hungarian Red cross in **Lónya**, **the Hungarian Maltese Charity Service in Beregsurány**. At the time of writing (February 2025) only two helping points in Záhony and Beregsurány are in operation. The staff of the council members are present 24/7 at the helping points and provide assistance to people who cross the border and need any type of assistance for any reason. Regarding access to the temporary protection procedure, information materials mainly produced by other non-state entities are placed and used at the helping points. As written above, information about accessing protection at the border was predominantly conveyed by informal and random referral mechanisms. Information provision has not been coordinated by the state and the NDGAP, responsible for immigration and asylum and temporary protection procedures. The NDGAP has been absent at the helping points, shelters and accommodation sites.

Lack of interpretation

In the experience of HHC lawyers, the greatest problem hindering registration of temporary protection applications in the first two years of the crisis was the lack or shortage of interpreters present at the asylum client services countrywide, with the exception of **Budapest** client services, where at least one Russian-speaking administrator is always present. In 2024, this problem has not been widely reported, except by the Hungarian Interchurch Aid.⁸³

Denial of access to registration of TP application and extensive length

Furthermore, HHC lawyers also reported multiple times, both in 2022 and 2023, that the asylum authority refused to register and take over the applications of those who did not seem to be 'instantly eligible' within the meaning of the TP Decree, such as third-country nationals, Ukrainians without personal ID documents, Ukrainians who arrived prior to 24 February 2022. The TP application of a TCN - eligible for his Ukrainian family members - was not registered when entry was refused to Hungary at the border crossing point in

⁸¹ Section 4 of Government Decree 30/2024 (II.22) amending Government Decree 104/2022 (III.12)

⁸² Rules relating to the establishment, operation and membership of the Charity Council are set out in Government Decree 65/2000. (V. 9.).

⁸³ Information received from the Hungarian Interchurch Aid by the HHC on 11 February 2025.

Záhony.⁸⁴ In these cases, HHC lawyers, with the authorisation of the applicants, represented them in the procedure. The court, however, while ruling on the inadequate non-refoulement assessment, did not rule on whether or not the individuals in question would have been eligible for temporary protection, as it considered that there was no proof that temporary protection was requested.⁸⁵ These occurrences concern 2023, and no such occurrence was reported in 2024.

The lawyers' experience showed that once the applicants were accompanied by their legal representative, the case-officers of the asylum authority registered the applications. Although in some of the cases the lawyers did not contest the fact that the applicant was not eligible under the TP Decree (e.g., prior 24 February 2022 arrivals), they suggested that the registration of the application was still of utmost importance for the asylum authority having then the opportunity and the obligation to assess *refoulement*. As a result, the applicants, while not being recognised as beneficiaries of temporary protection, could still be granted tolerated status, because the principle of *non-refoulement* was applied and refusal of entry decision was not rendered.

As, contrary to what is foreseen in the EU TP scheme, in Hungary protection is not immediate and triggered by the sole submission of the application, the consequences of a failed registration and those of a refusal of an application must be distinguished. There is no institutionalised appeal procedure against a refusal to register a temporary protection application. Nevertheless, in the experience of the HHC, applicants may attempt to submit their application again, even if the authority refused to take their application beforehand, as there is no provision in law precluding that. The acting case-officer takes no formal decision if the registration of the application is denied.

In 2022, the temporary protection procedures frequently run beyond the procedural deadline (55 days). This may be partially attributed to the fact that the NGDAP asylum authority did not have the sufficient capacity to deal with the initially overwhelming influx of temporary protection applicants. The number of NGDAP case-officers assessing temporary protection applications was only 16 on 31 December 2022.⁸⁶ This was a significant shortcoming during the initial year of the crisis, as during the temporary protection procedure, applicants are not entitled to financial support. Access to the subsistence allowance, the only type of financial support provided by the state within the context of temporary protection, is only possible once status is granted.⁸⁷ The HHC also reported that there has been a delay in the issuance of temporary protection cards. In these cases, the asylum authority sometimes provided beneficiaries with a certificate of the protection instead of the temporary protection card. Some government offices, where applicants have to request the subsistence allowance, however, do not accept the official certificate, thus causing further delays in accessing the financial aid.

In 2023 and 2024, substantive delays in conducting the temporary protection procedures have not been frequently reported. This may be attributed to the fact that the number of TP applications submitted in 2023 and 2024 were around 25,000 fewer than the year before. The number of NDGAP case-officers assessing applications decreased, however, from 16 to 8 by 2024.⁸⁸ In the experience of the HHC, the people were generally able to access the temporary protection procedure throughout 2024.

Staff members of Menedék Association furthermore reported that the sometimes incorrect registration of the applicant's data (e.g., typo mistakes) contributed to further procedural shortcomings in 2022, 2023 and 24. (e.g., when the beneficiary tried to notify the NGDAP on the change of their address, the NDGAP

⁸⁴ Registered on 18 May 2023 during the monitoring mission of the HHC.

⁸⁵ Judgments of Debrecen Court nr 4.K.702.273/2023/7 of 5 December 2023. nr 4.K.701.177/2023/6 of 6 July 2023, nr 15.K.702.514/2023/5 of 9 January 2024 and nr. 18.K.702.659/2023/4 of 15 February 2024.

⁸⁶ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023.

⁸⁷ Section 37/A (1) e.) and Section 37/A (4) b.) of Asylum Decree; Section 4 (2)-(3) of Gov. Decree 106/2022 (III. 12.).

⁸⁸ Information received from the NDGAP by the HHC on 20 February 2025.

could not identify the individual).⁸⁹ Menedék Association furthermore pointed out that the main obstacles to apply for temporary protection in 2023 were the lack of information and the illiteracy of the applicants. The Association finally noted that in some cases people with disabilities were not able to apply in person in the asylum client services or in the government offices. In these cases, social workers of the organization arranged either special transportation or contacted the NDGAP or government offices in the matter and then the authority personnel went to the accommodation sites to register the applications.⁹⁰

4. Legal assistance

The TP Decree precludes the application of the provisions of the Asylum Act, according to which applicants are to be provided with the possibility of legal assistance or access to free legal aid in case of need, according to the rules set out in the Act on Legal Aid or by an NGO registered in legal protection.⁹¹ This does not mean that temporary protection applicants cannot have legal assistance in the procedure, but that the state is not required to provide legal aid upon the applicant's request, as is the case in general asylum procedures.

In the absence of state-coordinated legal aid, non-state actors were quick to react and established various channels via which legal assistance could be instantly accessed by people fleeing Ukraine. According to the experience of the HHC, legal assistance services concerning temporary protection were provided predominantly by the civil society organisations (e.g., HHC and Menedék Association), a network of legal assistance providers called 'Hungarian Attorneys for Ukraine' set up by the Hungarian Bar Association and by international organisations such as the UNHCR and IOM.

Most of these actors set up a dedicated phone number for hot-line and email addresses, operated by Ukrainian or Russian-speaking staff members or with their help. The assistance providers made their information materials available on their websites. The UNHCR and the IOM were constantly present in the border area after 24 February 2022 and the HHC monitors it on bi-weekly to monthly basis throughout 2022-23. By 2024, the presence of these actors became ad hoc.

In-person legal assistance in **Budapest** is available in the offices of the HHC and Menedék Association, at the community centre called Budapest Helps!, which was set up together by the UNHCR and IOM in partnership with Budapest Municipality and is dedicated to people fleeing Ukraine,⁹² and at IOM's Info Point at Nyugati Railway Station. If there is a need for legal representation in the temporary protection or following judicial review procedures, it has been provided either by attorneys and lawyers of the HHC or network members of 'Hungarian Attorneys for Ukraine', after a direct inquiry or by a referral to these entities.

In 2022, in the Budapest BOK Centre, a sport facility which was converted into a humanitarian transit spot specifically for people fleeing Ukraine, staff members of the NDGAP were present, and provided information on the temporary protection procedure. Appointments to start the procedure could be booked with them.

The BOK Centre was, however, shut down in August 2023. The immigration/asylum authority or other competent state-actors, usually responsible for providing information, have since then been completely absent from the 'field'. They are neither present at the border or at the shelters. Because of the lack of state-coordinated information provision, whether individuals could access any type of legal assistance has been almost entirely depended on the non-state actors. In the absence of the BOK Centre, people

⁸⁹ Information received from the Menedék Association by the HHC on 28 February 2023.

⁹⁰ Information received from the Menedék Association by the HHC on 21 February 2024.

⁹¹ Section 4(1) c.) of the TP Decree precludes the application of Section 37 (3) of Asylum Act.

⁹² Budapest, 'Budapest helps', available at: <https://bit.ly/3RCYxiN>; on the activities see UNHCR, *Refugee Situation Operational Update, September-December 2022*, December 2022, available at: <https://bit.ly/3jfAjOR>.

from Ukraine arriving after 1 August 2023 and travelling directly to Budapest can seek assistance at the Government Office at the Western Railway Station (Nyugati Pályaudvar, 1062, Budapest Teréz körút 55.) during opening hours. Assistance may be asked for accommodation and information about benefits people feeling Ukraine are entitled to in Hungary.⁹³

Between 24 February 2022 and 31 December 2024, the HHC assisted 7,356 people in person, responded to 3,574 emails, 1,888 phone calls and 8908 messages coming from people who fled Ukraine, predominantly seeking legal help. Despite being the only civil society organisation providing legal assistance in asylum procedures, the HHC was not granted access to the BOK Centre in 2022, although requesting it from the Budapest Government Office. The UNHCR reports that in 2024, 31 organizations, including refugee-led groups, national and international non-governmental organizations (NGOs), as well as United Nations Agencies, provided support to around 33,000 refugees across Hungary.⁹⁴

5. Information provision and access to NGOs

According to the Asylum Act, the asylum authority is to inform the applicant on their procedural rights and obligations and the consequences of breaching these obligations. This is to be done when the applicant submits the application, in a written form, in the native language of the applicant or in one which is otherwise understood by the applicant.⁹⁵ Although the Asylum Act would normally require the authority to record the fulfilment of this obligation in the minutes,⁹⁶ the TP Decree precluded the application of this provision in temporary protection procedures.⁹⁷ In the experience of the HHC, no such written information is provided to the applicants when they lodge the application. If there is no language barrier or interpreters are present, the case-officers of the asylum client services normally provide information to applicants in person, informing them about the expected duration of the procedure and on the communication of the decision. Furthermore, the Asylum Act provides that upon communicating the decision on recognition, the authority has to inform the beneficiary of their rights and obligations.⁹⁸ The Asylum Decree also requires the authority to inform the beneficiary in a written form of the available services and financial support to which they are entitled when delivering the decision. The information must be provided in the native tongue of the beneficiary or in a language they understand.⁹⁹ In line with the TP Decree, however, the authority does not adopt a separate decision about recognition and only records the recognition itself and notifies the applicant by handing over the temporary protection document.¹⁰⁰ The asylum authority partially complies with the referred provision of the Asylum Act. Along with the TP card, a letter is sent informing the beneficiary that the card does not entitle its holder to travel and that receipt of the card renders its holder eligible to request the regular subsistence allowance at the competent district office. In this regard, the beneficiary is also informed that they have an obligation to register at the district office by the last day of each month during the period of temporary protection. There is no information in the letter about how to access other services which a beneficiary is entitled to (healthcare, education, travel discount etc.). This is contrary to Article 9 of the Temporary Protection Directive providing that 'Member States shall provide persons enjoying temporary protection with a document, in a language likely to be understood by them, in which the provisions relating to temporary protection and which are relevant to them are clearly set out.'

The HHC turned to the NDGAP requesting information on how the authority complies with its obligation concerning information provision. The NDGAP answered that the TP Decree was a *lex specialis* to the

⁹³ This information has never been shared via official channels, it is known by the experience of assistance partners.

⁹⁴ UNHCR, 2024 end-of-year report | Regional Refugee Response Plan for the Ukraine situation, available [here](#).

⁹⁵ Section 37 (1) of Asylum Act.

⁹⁶ Section 37 (2) of Asylum Act.

⁹⁷ Section 4 (1) c.) of TP Decree.

⁹⁸ Section 79 (3) of Asylum Act.

⁹⁹ Section 38(1) of Asylum Decree.

¹⁰⁰ Section 5/A (3) of TP Decree.

general rules set out in the Asylum Act and Decree, thereby, it did not apply Section 38(1) of the Asylum Decree that was relevant regarding this obligation.¹⁰¹ The TP Decree, however, does not preclude the application of the said section, thus, the authority should comply with it. The NDGAP furthermore stated that beneficiaries receive information when they receive their temporary application form in the client services and also that information is available on their website. Information provision is, however, insufficient and on the website some relevant information is only available in Hungarian and English.

There have been no special measures or practice introduced concerning the needs of vulnerable groups in any aspects of the temporary protection procedure. Accordingly, there is no information provided by state actors specifically tailored to the needs of vulnerable individuals.

Staff members of the NDGAP were neither present in the border area, nor were they visiting the accommodation sites for the purpose of information provision. The authority provided information on temporary protection on its website¹⁰². In the experience of the HHC and Terre Des Hommes Hungary,¹⁰³ the fact that the NGDAP could barely be contacted via phone or email throughout 2022 posed unreasonable difficulties to persons of concern and to the authority too, as usually there was no other way to obtain information but to go to the authority in person, thereby burdening further the already overburdened capacities of the authority. In 2023 and 2024, no such difficulty has been reported.

On a positive note, a state hotline was quickly set up by the government in March 2022, providing information in Ukrainian, Hungarian and English on basic issues relating to temporary protection procedure, entry, individual situations¹⁰⁴. A dedicated email address was also set up for the same purpose. The officers, however, were not really up-to-date as the hotline did not belong to NDGAP, they had to make inquiries to the NGDAP themselves. In the HHC's experience, they could answer straightforward questions but were professionally not prepared to answer more complex ones and had no information on resolving more complicated legal situations. As to the emails, information was sometimes quickly and efficiently provided, but other times no response arrived. In December 2023, the Government launched the Safe in Hungary portal.¹⁰⁵ The website offers information on TP, assistance and services, on the legal status of dual nationals (Ukrainian – Hungarian) and emergency contacts in multiple languages. The website operated throughout 2024, with information available on the topics mentioned, and on legal changes occurring during the year.

¹⁰¹ Letter received from the NDGAP's asylum department by the HHC on 16 June 2022.

¹⁰² The NDGAP website is available [here](#).

¹⁰³ Information received from Terre Des Hommes Hungary on 28 January 2023.

¹⁰⁴ Official press release in English: [here](#). Phone numbers from HUN (free of charge): 06 80 310 310, from Ukraine: 0 800 504 546, from abroad: +36 1 550 1828, E-mail: menekultinfo@me.gov.hu.

¹⁰⁵ Available [here](#).

D. Guarantees for vulnerable groups

There are no specific identification mechanisms in place in Hungary to identify vulnerable individuals under the temporary protection scheme. Notably, there has been no comprehensive screening for people with special protection needs.¹⁰⁶

In its information request sent to the NGDAP, the HHC asked how many individuals fleeing Ukraine to Hungary were identified as vulnerable by the relevant authorities and concerning the years 2022 - 2024. Worryingly, the NGDAP stated they had no data in that regard.¹⁰⁷

People with disabilities

In the experience of the HHC, people with disabilities have been frequently placed in shelters without reasonable accommodation that are not appropriate to their needs, lacking the necessary medical/psychological assistance. This has been a constant issue since the beginning of the crisis. In 2023, the HHC recorded a concerning number of accommodation sites in which the situation of those requiring medical assistance due to their disability or mental/physical health was not addressed. In the border area, people with disabilities were accommodated in the out-of-use buildings and storage facilities of nursing homes and elderly homes, with only the most basic care, where their physical and medical needs were not fully met. The staff of these institutions had to take care of them on top of their regular workload and thus have limited capacity to care for them.¹⁰⁸ It was also reported that some accommodation sites were unwilling to take people with disabilities in in 2023.¹⁰⁹ Individuals with disabilities receive no additional support (logistical or monetary) from state actors, which is very burdensome not only for the persons of concern, but also for the facilities hosting them.¹¹⁰ The UNHCR also reported: “despite seemingly equitable access to TP status, households with a member with disability report more frequently unmet needs, around healthcare, implying heightened vulnerability compared to other households. As expected, households with persons with disability exhibit a significantly higher reliance on social protection benefits. It is important to mention is that refugees with disabilities in Hungary do not have access to government disability grants as Hungarian citizens.”¹¹¹

There have been no such occurrences reported concerning 2024.

Survivors of trafficking in human beings and persons at risk of human trafficking

Although the arriving population mainly consisted of women and children being at risk of human trafficking, no adequate preventive measures specifically targeting persons fleeing Ukraine have been implemented. This means, among others, that no information on the risks of trafficking in a language these people understand is accessible at accommodation sites. There is also no information available for unaccompanied minors (UAMs) designed in a child-friendly and age-appropriate manner. Moreover, there is no information available at the accommodation sites or at the helping points close to the border on the fact that victims of human trafficking or those who are at risk of trafficking may turn to the National Crisis Management and Information Service, where no Ukrainian- or Russian-speaking personnel is available.

¹⁰⁶ UNHCR, *Inter-Agency Operational Update Hungary*, 10 May 2022, available [here](#).

¹⁰⁷ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023 and 19 February 2024 and 20 February 2025.

¹⁰⁸ The HHC recorded these cases on 18-19 June and 12-14 November 2023 during its monitoring mission.

¹⁰⁹ The HHC recorded this case on 9 October 2023 in Dunaújváros during its monitoring mission.

¹¹⁰ The HHC recorded this on 31 July - 1 August 2023 during its monitoring mission.

¹¹¹ UNHCR, Hungary: Multi-Sector Needs Assessment, December 2023, available [here](#).

Throughout 2022, the HHC observed some reports of unfair labour conditions by applicants or beneficiaries of temporary protection who started to work in Hungary. Most reports complained about an unfair salary (e.g., receiving a substantially lower salary than agreed beforehand) or the fact that persons are employed without a contract.¹¹² This trend has not been prevalent since 2022, at least no such reports have reached the HHC. The HHC recorded one occasion in 2024 when people who fled Ukraine and were accommodated in Ercsi complained that they had problems finding permanent jobs, as they are mostly hired for casual labour. Recently, the men residing at the said accommodation site did not receive enough money for their work, they basically had to work for free for a week.¹¹³ The Hungarian Interchurch Aid also reported that many of those people from Ukraine who turned to them informed them that they often had to work for free, in dire conditions or without a contract.¹¹⁴

Unaccompanied and separated children

There have been no special procedures adapted specifically to the needs of UAMs who are entitled to temporary protection. The TP Decree even excluded the application of some procedural guarantees concerning UAMs provided by the Asylum Decree.¹¹⁵ Accordingly, if an UAM is to be heard in a temporary protection procedure, which is unlikely in practice but possible by law, they may be heard without their legal representative or guardian being present and without other guarantees prevailing (e.g., interview in a child-friendly environment).

The most worrisome deficiency of the authority's practice regarding UAMs has been the fact that the appointment of guardians has been frequently absent. Based on the Asylum Act, if the applicant is an UAM, the authority is to arrange their temporary accommodation and the appointment of a child protection guardian.¹¹⁶ In this case, the asylum authority must decide the UAM's case in a prioritised procedure.¹¹⁷ The Asylum Decree furthermore provides that UAMs under the age of 14 must be accommodated within the child protection system.¹¹⁸ In case of UAMs who are 14 years old or older, the authority is obliged to notify the district office in order to provide the UAM with a legal representative and case guardian.¹¹⁹

However, in the HHC's experience, the asylum authority enforced none of these guarantees. This worrying practice led to UAMs alone or under the care of persons not related to them at accommodation sites, without being transferred to the official children's care facility. In the experience of the HHC, this phenomenon was present throughout 2022, but was not prevalent in 2023.

In March 2022, the HHC reported from various accommodation sites that many unaccompanied minors were placed there without the care of relatives or guardian. The high number of unaccompanied children placed with various sports club was of particular concern. Although the children were placed in facilities with good material conditions, they lacked access to education, to professional staff who was able to communicate with them and who could take care of them. For detailed description of these cases, please see the AIDA 2022 Temporary Protection Report.

In 2023, no cases of this magnitude concerning unaccompanied minors were registered by the HHC. One case was recorded on 25 October 2023, at Vitnyéd-Csermajor accommodation site, where 4 children (7.6, 4 and a 2 year-old) were left alone by their parents. The HHC asked the local staff if they informed the local guardianship office about these unaccompanied children. However, according to the local staff, these families were used to the fact that some parents leave their children alone, and the other parents

¹¹² HHC, Labour exploitation encountered in the framework of the Ukraine refugee crisis response of the Hungarian Helsinki Committee, 20 January 2023, available [here](#).

¹¹³ Case registered by the HHC in April 2024 in Ercsi during HHC's monitoring mission.

¹¹⁴ Information received from the Hungarian Interchurch Aid by the HHC on 7 February 2025.

¹¹⁵ Section 5(1) g.) of Asylum Decree excludes the application of Sections 74-76 of Asylum Decree.

¹¹⁶ Section 36(6) of Asylum Act.

¹¹⁷ Section 36(7) of Asylum Act.

¹¹⁸ Section 33 (4) of Asylum Decree.

¹¹⁹ Section 99/F (1) of Asylum Decree.

then look after those children who had been left by their own parents. The local staff did not consider taking the children out from this environment as the best interest of the children. When the HHC staff returned to the accommodation site later in December, parents were already back.

In 2024, no similar reports concerning unaccompanied children were communicated to the HHC.

In its information request sent to the NGDAP the HHC asked the number of registered temporary protection beneficiary UAMs. Worryingly, the NGDAP stated they had no data in that regard, neither for the year 2022 nor for 2023 and 2024.¹²⁰ According to the Directorate General for Social Affairs and Child Protection, the Károlyi István Children's Centre - where unaccompanied minors are officially accommodated - had a total of 3 minors with shelter status registered as beneficiaries on 31 December 2023.¹²¹

Roma people

Lastly, the situation of Roma people fleeing Ukraine has to be mentioned, as these people, attributed for their ethnic origin, had to face additional difficulties and hardship during their reception in Hungary, which are not anyhow counterbalanced by appropriate guarantees built in the national protection scheme. The HHC reported that throughout 2022 the Roma had to face some issues relating to accessing protection, accommodation, and other protection-related services. In some cases, there were complaints relating to discrimination, incidents of hate crime, and segregation.¹²²

In 2023, some of the challenges still remained with the Roma. In Pomáz and Érd, healthcare providers were behaving in a discriminatory manner towards the Roma people accommodated in these towns. While the same healthcare provider assisted ethnic Ukrainians, they refused to provide the same services for the Roma accommodated at the same sites as the Ukrainians.¹²³ At the Gyöngyös accommodation site most of the people are of Roma origin and they claimed that there was a discriminatory attitude towards them from potential employers, especially if it turned out that they were illiterate, even if no reading/writing skills were needed for the work.¹²⁴ UNHCR's multi-sectoral needs assessment also found that amongst beneficiaries of temporary protection, those of Roma origin faced discriminatory attitudes from potential employers.¹²⁵

No such reports have been registered by the HHC concerning 2024, although it is worth mentioning that the 2024 legislative amendments in relation to withdrawal of State-subsidized housing concerned mainly the Roma population arriving from the Transcarpathia region. More information on this can be further found in the housing chapter.

Psychological assistance of vulnerable people in need

There have been non-State coordinated programmes introduced to address the needs of individuals suffering from mental health problems. This type of assistance was also arranged mainly by NGOs. Special bio-psycho-social assistance to people fleeing Ukraine is provided by the Cordelia Foundation country-wide. Their psychologists and psychiatrists provided assistance to 115 persons suffering from

¹²⁰ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023, 19 February 2024 and 20 February 2024.

¹²¹ Information received from the Directorate General for Social Affairs and Child Protection by the HHC on 20 February 2024.

¹²² The experience of the HHC is summarised in that regard in a thematic paper called 'The Situation of Romani Refugees Fleeing Ukraine: Experiences gathered in the framework of the Ukraine refugee crisis response of the Hungarian Helsinki Committee', April 2023, available [here](#).

¹²³ Cases registered by the HHC on 18 September and 14 December 2023 in Érd and Pomáz during HHC's monitoring mission.

¹²⁴ Case registered by the HHC on 13 July 2023 in Gyöngyös during HHC's monitoring mission.

¹²⁵ UNHCR, Hungary: Multi-Sectoral Needs Assessment, Final Report, December 2023, available [here](#), 12.

mental health problems in 2024 in Budapest, but they also conducted regular visits to people accommodated at Tuzsér, Mérk, Eger , Győr , Fót, Felcsút, Miskolc, Hódmezővásárhely, Szabadszállás.¹²⁶ In 2024, the Jesuit Refugee Service ran 147 community building and mental wellbeing programmes.¹²⁷ The Hungarian Interchurch Aid reported to have provided psychological assistance with the help of government funds in 2024.¹²⁸

¹²⁶ Information received from the Cordelia Foundation by the HHC on 17 February 2025.

¹²⁷ Information received from the Jesuit Refugee Service by the HHC on 27 February 2025.

¹²⁸ Information received from the Hungarian Interchurch Aid by the HHC on 7 February 2025.

Content of Temporary Protection

A. Status and residence

1. Residence permit

Indicators: Residence permit

- | | |
|--|--------------------|
| 1. What is the duration of residence permits granted to beneficiaries of temporary protection? | Until 4 March 2026 |
| 2. How many residence permits were issued to beneficiaries from the activation of the Temporary Protection Directive until 31 December 2024? | 43,317 |

Following recognition as a beneficiary of temporary protection, the NDGAP sends the temporary protection card (hereinafter: residence card or TP card) normally by post, or, if the beneficiary cannot be found under the address they gave to the authority upon application, the card is to be collected at the asylum client service where the applicant made their application or at the Budapest client service. As explained under Registration under Temporary Protection, the authority does not make a separate act on the recognition but materialises the positive decision by sending the temporary protection card. Therefore, the deadline by which the procedure is to be conducted (55 days) is the legally required duration within which the TP card is to be received. In the HHC's experience, in the first 3 quarters of 2022, there were severe delays regarding the issuance of the temporary protection card (sometimes lasting over 70-90 days). This has posed a severe problem as subsistence allowance – the only type of financial support to which beneficiaries are entitled - may be requested only by temporary protection card holders. To remedy this, the asylum authority sometimes issued an official certificate about temporary protection, but not all Government/District offices (in Hungarian: 'járási hivatal') accepted it in the absence of the actual card. In 2024, no substantive delays in issuing the TP card were observed. The Hungarian Maltese Charity Service reported that delay in receiving the permit occurred frequently for beneficiaries not registering their change of accommodation with the NDGAP, therefore, permits were sent to the wrong addresses. The charity furthermore pointed out that the data indicated on the residence permit cards was sometimes incorrect for the wrong translation of Cyrillic alphabet to the Latin alphabet.¹²⁹

All residence permits issued in 2022 were valid until 4 March 2023. As the EU temporary protection was extended, 58/2023 Government Decree (II.28) also declared the prolongation of the Hungarian TP cards' validity until 4 March 2024. Most recently, the 343/2024 Government Decree (XI. 14) declared the prolongation of the Hungarian TP cards' validity until 4 March 2026. One of the most worrying issues in 2023 was precisely that, although the government extended the validity period of TP cards and they had to be considered valid by law, as the cards were not replaced with new ones showing the new validity period, many external actors and (e.g., health-care service providers) believed that the temporary protection status was no longer valid and thus denied the enjoyment of rights connected to the temporary protection status.¹³⁰ This caused general confusion among TP beneficiaries too and many believed that their status was no longer valid and they had to submit a new application. In the experience of the HHC and the Menedék Association, this has confused authorities and health care providers too, which thus questioned beneficiaries' eligibility to services. This issue was prevalent in 2024 too.¹³¹

There is only one right which is connected solely to the possession of the TP card in practice. According to Government Decree 106/2022. (III. 12.), the beneficiary of temporary protection is entitled to a subsistence allowance.¹³² This also means that during the procedure, the applicant cannot receive the subsistence allowance. However, in the absence of a formal decision on recognition, TP beneficiary status

¹²⁹ Data received from the Hungarian Maltese Charity Service by the HHC on 26 February 2024.

¹³⁰ The HHC recorded numerous such cases, e.g., on 11-12 May 2023 in Ráckeve and Demjén Albertmajor, 27 March 2023 in Szentes, 13-14 March in Beregsurány.

¹³¹ Information received from the Menedék Association by the HHC on 21 February 2025.

¹³² Section 4 of Gov. Decree Government Decree 106/2022. (III. 12.).

can be substantiated by holding a TP card. As explained earlier, a letter is sent along the TP card informing the beneficiary that they can request the subsistence allowance at the Government/District office.

The table below summarises which are the rights that can – or could - be accessed by applicants and beneficiaries of temporary protection respectively, referring to their basis in law.

Benefits	Applicant	Beneficiary
Accommodation, meals, hygienic services	Section 22(1)c.) of the Asylum Act; Section 21(1)a.) and Section 101 of the Asylum Decree, Sections 1-3 of Gov Decree 104/2022 III.12.) (The assessment by the authority under Sections 16(4) -19 of the Asylum Decree shall be excluded under points (c)-(d) of Section 5(1) of Gov. Decree 86/2022 (III. 7.)	Until 1 August 2023, based Section 41 (2) of the Asylum Decree, beneficiaries were entitled to accommodation and care. Since then, however, the provision is non-applicable as a result of a legislative change. ¹³³ Thus, it is unclear if there is a national legal ground based on which accommodation and care (meals) are to be provided, although Section 32(2) of the Asylum Act, not having been overridden by the legislative change, provides for the material reception conditions for beneficiaries “in need” . This situation is presumably the result of inconsistent legislation. In practice, those beneficiaries, after whom the accommodation provider is entitled to receive state allowance, are provided with meals 3 times a day at the accommodation site. On 28 June 2024, the government further restricted access to state-funded mass shelter of beneficiaries of temporary protection. The decree came into full effect on 21 August 2024 and amended Gov. Decree 104/2022 (III.12) and prescribe that only vulnerable beneficiaries of temporary protection who resided in a “territory impacted by war” remain eligible for state-funded mass shelter.
Health care	Sections 26-28 of the Asylum Decree Section 6(2)a.)-b.) of Gov. Decree 86/2022 (III. 7.): specialised oncological care, examinations and medical treatment within the framework of health services related to other chronic illness Gov. Decree 171/2022. (IV. 29.) – on the practical arrangements of receiving health care	Section 37/A(1)b.) and Section 44(2) of the Asylum Decree; Section 6(2)a.)-b.) of Gov. Decree 86/2022. (III.7.), Gov. Decree 171/2022. (IV. 29.)
Education	Section 29 of the Asylum Decree Section 92 (1) a.) and (3) of Act CXC of 2011 on Public Education	Section 37/A(1)c.) and Section 45 of the Asylum Decree; Section 3 of Gov. Decree 106/2022. (III. 12.) (preschool and childcare services) Section 92 (1) a.) and (3) of Act CXC of 2011 on Public Education

¹³³ Gov. Decree 337/2023 (VII.24.) amending the TP Decree by adding Section 5(4) providing that “Section 41(2) of the Asylum Decree shall apply with the exception that the beneficiary of temporary protection shall not be entitled to accommodation and care at the reception centre.”

Free meals for children	Section 3/A of Gov. Decree 106/2022. (III. 12.) on request, for six months, if care-taker's income is below 173.000 HUF	Section 3/A of Gov. Decree 106/2022. (III. 12.) On request, for six months, if care-taker's income is below 173.000 HUF
Regular subsistence allowance (22,800 HUF - (around EUR 55) per adult/month and 13,700 HUF per child/month (around EUR 30)	-	Section 37/A (1)e.) and Section 37/A (4)b.) of the Asylum Decree; Section 4 (2)-(3) of Gov. Decree 106/2022 (III. 12.) BUT Section 2(2): persons shall be obliged to accept the job offered to them within 45 days following the first payment of subsistence allowance. The allowance is subject to a monthly appearance in person before the district office. The entitlement to allowance shall cease in case of employment or pension.
Travel allowances	Section 24 of the Asylum Impl. Decree	Point (c) of Section 37/A(2) and Section 48 of the Asylum Decree. It must be requested from the asylum authority [Section 48 (2)]
Bearing the costs of public funeral	Section 25 of the Asylum Decree	Section 6 (2a) of the Asylum Decree ¹³⁴
Reimbursement of document translation costs	Section 6(2)c.) of Gov. Decree 86/2022. (III. 7.) Section 49 of the Asylum Decree; documents issued before the recognition as beneficiary of temporary protection, especially extracts from birth or marriage register, certificates of education or vocational training	Section 37/A (3)b.) and Section 49 of the Asylum Decree
Employment	Section 6 (4) of Gov. Decree 86/2022. (III. 7.) – No special permit is necessary for the employment Public employment: Section 7 of Gov. Decree 86/2022. (III. 7.)	Section 6 (4) of Gov. Decree 86/2022. (III. 7.) – No special permit is necessary for the employment Public employment: Section 7 of Gov. Decree 86/2022. (III. 7.) Act CVI of 2011
Facilitating final departure from the country	-	Section 37/A(3) c.) of the Asylum Decree
Family Reunification		Section 105 of the Asylum Decree: If the family member was awarded temporary protection in another Member State, family reunification may be requested
Reimbursement of Hungarian language course and exam	-	Section 51 of the Asylum Decree

¹³⁴

In effect from 1 March 2024.

Reimbursement of all or part of the travel-related expenses in case of permanent departure from the Hungary	-	Sections 31 and 50 of Asylum Decree
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It is important to mention that all benefits which can be accessed by the beneficiary of temporary protection can also be accessed by dual Hungarian-Ukrainian citizens who fled Ukraine after 24 February 2022 and had a permanent residence there, unless more favourable treatment is granted by virtue of the Hungarian citizenship.¹³⁵ This is because those who hold Hungarian citizenship may not apply for temporary protection, but the law maker intended to grant them the same support as nationals of third countries entitled to the protection. Although there is no official data as to the numbers of Hungarian-Ukrainian dual citizens residing in Ukraine fled to Hungary as a result of the war, based on the information the HHC received from the Ministry of National Economic, 32.061 requests for financial support were submitted by dual citizens to competent government authority between February 2022 and 31 December 2024.¹³⁶ This figure is, of course, only indicative regarding the number of dual citizens who wished to claim financial assistance under the TP scheme, but there is no official information on the exact number of dual citizens who fled from Ukraine to Hungary for the war.

Transferring residence to another EU Member State or from a Member State to Hungary

In the experience of the HHC lawyers, procedures to transfer residence to another EU Member State depend on the laws and practices of the targeted Member State. The Hungarian asylum authority does not require individuals moving to other member states to notify them beforehand. In practice, however, notifying the authority on the change of address is advisable to be able to receive official correspondence. If the person receives temporary protection in another member state, the asylum authority is obliged to withdraw the temporary protection status granted in Hungary with the consent of the beneficiary.¹³⁷ It is worth mentioning that in its answer sent to the HHC, the asylum authority stated that according to their current practice, the fact that an individual was granted temporary protection status in another member state does not preclude them from applying for or being granted temporary protection in Hungary again.¹³⁸

There is no formally introduced procedure to follow if the applicant has transferred to another member state. The law only provides that the asylum authority is to withdraw the status if the beneficiary renounces it in writing.¹³⁹

According to the data of the NDGAP, the authority withdrew the temporary protection status of 3.830 beneficiaries who renounced their status.¹⁴⁰

2. Access to asylum and other legal statuses

Contrary to Article 17 (1) of the TPD, it is not possible for either applicants for temporary protection or beneficiaries of temporary protection to apply for asylum in Hungary. On 26 May 2020, the government issued a government decree that introduced a new asylum system, the so-called “embassy procedure”.¹⁴¹ This new system was later included in the Transitional Act entered into force on 18 June 2020 and is still

¹³⁵ Section 8 of TP Decree.

¹³⁶ Information received from the Ministry of National Economic on 11 February 2025 by the HHC.

¹³⁷ Section 25 (2) a.) of Asylum Act.

¹³⁸ Letter received from the NGDAP asylum authority by the HHC on 16 June 2022.

¹³⁹ Section 25 (2) c.) of Asylum Act.

¹⁴⁰ Data received from the National General Directorate of Aliens Policing by the HHC on 20 February 2025.

¹⁴¹ Government Decree 233/2020. (V. 26.) on the rules of the asylum procedure during the state of danger declared for the prevention of the human epidemic endangering life and property and causing massive disease outbreaks, and for the protection of the health and lives of Hungarian citizens.

in effect.¹⁴² According to the new system, those wishing to seek asylum in Hungary, must first submit a 'statement of intent for the purpose of lodging an asylum application' at the Hungarian Embassies of **Kyiv**, Ukraine or **Belgrade**, Serbia.¹⁴³ Accordingly, no Ukrainian nationals submitted an asylum/statement of intent declaration throughout 2024.¹⁴⁴

Only people belonging to the following categories are not required to go through this process:

1. beneficiaries of subsidiary protection who are staying in Hungary;
2. family members of refugees and beneficiaries of subsidiary protection who are staying in Hungary;
3. those subject to forced measures, measures or punishment affecting personal liberty, except if they have crossed Hungary in an 'illegal' manner.

Accordingly, anyone who enters Hungary unlawfully and anyone who is legally staying in Hungary and does not belong to the three categories mentioned above, cannot apply for asylum in Hungary and beneficiaries of temporary protection are no exceptions. For more information on the new asylum system, please see [General Report – Embassy Procedure](#).

Consequently, if people eligible for temporary protection or beneficiaries of temporary protection want to seek asylum in Hungary, they must first go either to Ukraine or Serbia. In practice it is very unlikely that any person who fled the war in Ukraine would want to go back there for this purpose. They can go to Serbia if they hold the necessary travel document to enter the country. If the beneficiary is a Ukrainian national and has a valid passport, no visa is required and entry into Serbia is allowed.¹⁴⁵ However, if the beneficiary is a third-country national (e.g., family member of a Ukrainian citizen, who is eligible for temporary protection) who needs a visa to enter Serbia, the procedure is more complicated, as it has to be preceded by a visa procedure at the Embassy of Serbia, and the option to seek asylum in Hungary becomes quite hypothetical.

In its information request sent to the NDGAP the HHC asked for the number of asylum applications submitted by those individuals whose temporary protection application had been rejected or who applied for asylum after being recognised as a temporary protection beneficiary. The NDGAP stated that it has no data with regard to asylum applications submitted by those whose temporary protection application was rejected.

However, the HHC represented a Russian client whose temporary protection application was rejected, effectively both by the NDGAP and then, following a judicial review procedure, by the court. According to the court, in the temporary protection procedure the assessment of the non-refoulement under TP is of a restricted nature (practically no need for the same rigorous assessment as in the general asylum procedure, given the specific attributes of the TP procedure -e.g., it having to be fast etc.) and that the applicant, having regard to the judgment of the Court of Justice of the European Union in Case C-823/21, is not precluded from applying for asylum and stating in detail and giving reasons for all his fears concerning his return to Russia in the 'ordinary' asylum application.¹⁴⁶ While, on the one hand, the court's reference to the CJEU judgment recognising that the 'embassy system' is in breach with international and EU law, may be regarded as a positive development in jurisprudence, so far it has no practical relevance. On 27 February 2024, the client, accompanied by the lawyers of HHC, attempted to submit an asylum application in the Budapest client service of the NDGAP with reference to the judgment of Budapest Court, but the NDGAP took minutes and issued a ruling on the rejection of the application without an in-merit

¹⁴² Act LVIII of 2020 on the Transitional Provisions related to the Termination of the State of Danger and on Epidemiological Preparedness.

¹⁴³ Section 1 of Government Decree 292/2020 (VI. 17.).

¹⁴⁴ Data received from the National General Directorate of Aliens Policing by the HHC on 19 February 2025.

¹⁴⁵ Republic of Serbia, Ministry of Foreign Affairs, 'Visa regime', available [here](#).

¹⁴⁶ Judgment of the Budapest Court 11.K.702.224/2023/8-II. of 7 September 2023.

application, citing Section 32/F. c) of the Act on Asylum, providing that the application was submitted by a person clearly not eligible for the specific request. The NDGAP also held that there is no individual legal remedy. This practically means that the NDGAP still applies the provisions of Act LVIII of 2020 on the Transitional Provisions related to the Termination of the State of Danger and on Epidemiological Preparedness, establishing the ‘embassy system’, where the personal scope of those who may submit an asylum application in the territory of Hungary is specified (as explained above). The NDGAP’s decision was appealed and then again, the Court quashed the authority’s decision and ordered it to conduct a new in-merit procedure.¹⁴⁷ Nonetheless, the asylum authority again refused the application without examination on the merits referring to the fact that the applicant was not entitled to submit an application without the embassy procedure having been initiated beforehand. The decision - wrongly - refers to CC decision 32/2021, that is the novelty in their arguments. For more on this issue, please refer to the [General Report - Access to the procedure and registration](#).

As to asylum applications submitted by beneficiaries of temporary protection, the NDGAP revealed that no beneficiary had submitted any neither in 2022- 2024.¹⁴⁸

B. Family reunification

1. Family reunification as provided under the Temporary Protection Directive

Within TPD, the Asylum Decree provides that if a family member of a temporary protection beneficiary is granted temporary protection by another Member State applying the TPD, the beneficiary may, with a view to ensuring family unity, ask the asylum authority if the temporary protection afforded in the other Member State can be extended to them. The asylum authority shall then consult the Member State concerned as to whether the beneficiary is to be granted temporary protection with a view to ensuring family unity in that other Member State. If the requested Member State agrees to grant the beneficiary temporary protection, the asylum authority shall withdraw recognition as a beneficiary of temporary protection and issue them with a certificate specified in Annex 4 of the Asylum Decree, containing the personal data of the beneficiary and the fact that the certificate is issued for the purpose of transfer from Hungary to the other member state. If the requested state does not grant temporary protection to the beneficiary, the asylum authority shall notify them thereof, at the same time informing them of the provisions of Article 20(2) of the Asylum Act providing that the family member of the beneficiary, who is beneficiary of temporary protection in another Member State, is to be recognised as a beneficiary for the purpose of family unity in Hungary upon request.¹⁴⁹ Within the meaning of Asylum Act family members are: spouse (if family relationship existed before entering the territory of Hungary), minor child (including adopted and foster children), the parent or an accompanying foreign person responsible for them under Hungarian law.¹⁵⁰

If family members of temporary protection beneficiaries are reunited by applying the above rules, there are no material requirements.

2. Family reunification beyond the Temporary Protection Directive

Beyond the framework of TPD, it is not possible to apply for family reunification, neither for the sponsor (beneficiary of temporary protection), nor for their third-country national family members. Under the scope

¹⁴⁷ Judgment of the Budapest Court 16.K.700.035/2024/11 of 29 February 2024.

¹⁴⁸ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023 and 20 February 2025.

¹⁴⁹ Section 105 of Asylum Decree.

¹⁵⁰ Section 2 j.) of Asylum Act.

of Act II of 2007 and Act XC of 2023¹⁵¹ on the entry and stay of third country nationals, setting forth the rules for family reunification of third-country nationals (for further information see [General Report – Family Reunification](#)), a sponsor of a family reunification may not be a beneficiary of temporary protection.

C. Movement and mobility

Beneficiaries of temporary protection enjoy freedom of movement within Hungary, they are not subjected to any territorial restrictions.

In the view of the HHC, travelling between member states is possible by holding a TP card and a valid passport. This is so as according to the Preamble 16 of Council Decision and the EC's Operational Guidelines, once a Member State has issued a TP card (considered as residence permit), the beneficiary of temporary protection is entitled to travel to a Member State other than the one that issued the residence permit, for a period of 90 days within 180 days.

As the practice of the border police was, however, inconsistent as to what type of travel/residence documents are needed for beneficiaries of temporary protection to travel to other EU Member States from Hungary, the HHC turned to the NDGAP asylum authority and National Police Headquarters, requesting them to describe the border control practice concerning TP card holders and specify the legal basis of the practice.

The NDGAP asylum authority stated in their answer that the Council Decision and the EC Operational Guideline were not appropriate to be considered as *lex specialis* overriding the Schengen Border Code. The authority also highlighted that although the Council Decision and the Guidelines talk of the possibility of travelling to another Member State and the duration of stay, they remain silent as to what type of documents are needed for border crossing. Furthermore, in the view of the asylum authority, it is for the target country to decide what documents are required for entering the country.¹⁵²

The National Police Headquarters Border Police Department, to whom the HHC sent a request to clarify the practice and applicable law with regard to border-crossing of temporary protection beneficiaries, stated in its answer of 2022 that the National Police Headquarters as a law enforcement body is not entitled to interpret the law to any person or organisation – whose conducts may be thereby influenced – not subject to its direct supervision.¹⁵³

In 2024, the HHC again turned to the Police asking if beneficiaries of temporary protection, irrespective of their nationality may travel freely between Member States for 90 days if they hold a TP card or other document proving temporary protection issued in another Member State and a valid passport (old Ukrainian passport or biometric passport). The Police this time answered the question of the HHC stating that persons may travel freely within Schengen area if “if the Schengen Member State notifies the residence permit issued for temporary protection in the annex to the Schengen Border Code.” The answer further stated that “third-country nationals who hold a valid residence permit in the uniform format issued by one of the Member States applying the Schengen *acquis* in full shall have the right to move freely within the Schengen area for a maximum period of 90 days from the date of entry into the Member State.”¹⁵⁴ In 2022, the HHC recorded cases of beneficiaries of temporary protection believing that they had needed a valid biometric passport to be able to re-enter Hungary from Ukraine as Ukrainian border

¹⁵¹ Act II of 2007 is not effective from 1 January 2024 but was to be applied till 29 February 2024. It is replaced by Act XC of 2023, which is effective from 1 January 2024, but its provisions are to be applied from 1 March 2024. Rules concerning family reunification relevant for the purpose of this report have not changed.

¹⁵² Letter received from the NDGAP asylum authority by the HHC on 16 June 2022.

¹⁵³ Letter received from the National Police Headquarter by the HHC on 5 January 2023.

¹⁵⁴ Information received from the National Police Headquarter by the HHC on 19 February 2024.

guards require it. Some people not holding such passports were therefore worried about going back to Ukraine. Terre des Hommes Hungary also recorded such information.¹⁵⁵ This information has not been confirmed via official channels. In 2023, some cases in which Ukrainian individuals complained about being confused of what the required travel documents were enabling them to go back to Ukraine from Hungary and then return to Hungary again were recorded by the HHC.¹⁵⁶ In 2024, no such cases were recorded.

D. Housing

Indicators: Housing

1. For how long are temporary protection beneficiaries entitled to stay in reception centres?
For the whole duration of TP¹⁵⁷
2. Number of beneficiaries staying in reception centres as of 12/24 Not available
3. Number of beneficiaries staying in private accommodation as of 12/24 Not available

Accommodation solutions

According to the HHC, which visited nearly 600 places in relation to the Ukrainian crisis in 2022, and 297 in 2023, 93 in 2024, housing has been one of the most chaotic areas of the Hungarian implementation of the temporary protection scheme. This is because the accommodation of not only TP beneficiaries, but of all people fleeing Ukraine and being in need of a shelter, has not been coordinated in a centralised manner by the Government. Non-governmental actors, such as municipalities, NGOs, international organisations and private individuals took an equally important role in organising the housing of fleeing people as state actors did.

Tasks and competencies relative to accommodation have not been regulated by the usual legal instruments (e.g. in Government decrees), rather mechanisms have been established in an *ad hoc* manner. If an applicant indicates to the asylum authority upon submitting the application for temporary protection that they need accommodation, the National Directorate for Disaster Management, operating under the Ministry of Interior, carries out related arrangements, following notification of the asylum authority.¹⁵⁸

The HHC in its information request sent to the NDGAP asked how many persons fleeing Ukraine or being already beneficiaries of temporary protection signalled their need of accommodation at the NDGAP. In its answer, the NDGAP stated that in 2022, a total number of 31 persons, while in 2023 3 persons, in 2024 2 - 'all' beneficiaries of temporary protection - requested accommodation.¹⁵⁹ The HHC in its information request sent to the Ministry of Interior asked for the number of types (state-run or operated by municipalities) of accommodation sites and also for the number of those temporary protection applicants and beneficiaries who had been accommodated by the National Directorate for Disaster Management in 2022 and in 2023 respectively. The chaotic coordination of housing is also well-reflected by the fact that the Ministry of Interior responded that it did not qualify as the owner of this data. Therefore, as to 2024, no request on this data was submitted to the Ministry.

¹⁵⁵ Information received from Terre Des Hommes Hungary on 28 January 2023.

¹⁵⁶ Cases recorded on 20-21 February 2023 in Tata by the HHC during its monitoring mission.

¹⁵⁷ Section 41 (2) of the Asylum Decree.

¹⁵⁸ Press release of the Disaster Management on its website, [here](#). The NDGAP confirmed in its response sent upon the information request of the HHC that the National Directorate for Disaster Management is responsible to accommodate temporary protection applicants and beneficiaries.

¹⁵⁹ Information received from the NDGAP by the HHC on 19 February 2024 and 20 February 2025.

From Záhony railway station (border-crossing point) Ukrainian citizens and third-country nationals with Ukrainian residence permits can get a so-called free of charge 'solidarity ticket' and ride to Budapest by train. Since 1 August 2023, people arriving from Ukraine and travelling directly to Budapest can seek assistance at the Government Office at the Western Railway Station during opening hours, from where people may be sent to longer-term accommodation. If someone arrives outside opening hours and cannot ask for help that day in the Government Office, or if one passes through Hungary and does not want to stay for a longer period, a temporary accommodation for one night may be requested at Galvani utca 44/A, 1117 Budapest, Hungary. The accommodation is run by the Hungarian Maltese Charity Service.¹⁶⁰ The HHC talked to several social workers of Dévai Fogadó (accommodation site in Budapest), who explained that people could not successfully request accommodation at the government office located next to Nyugati railway station.¹⁶¹

Most accommodation solutions have been provided by municipalities at various locations: in schools, cultural centres, social and elderly homes and in random empty buildings owned by the municipality. According to Gov. Decree 104/2022 (III.12), accommodation for people fleeing Ukraine can be provided by a municipality or by an accommodation provider who has signed an agreement with the Ministry or the county or Budapest defence committee, in which cases accommodation providers may request an allowance (financial support) from the state. Between 24 February and 1 November 2022, municipalities and other state contracted accommodation providers could receive an allowance of 4,000 HUF/day/capita. After 1 November 2022, this amount increased to 7,000 HUF, but then from 1 August 2023, the amount again decreased to 5,000 HUF.¹⁶² Effective as of 1 August 2023, the rules of how and when the allowance may be requested have substantively changed.¹⁶³ The applicable rules - that were in effect until 20 August 2024, when following a set of amendments, new rules came into effect - will be summarised in the following paragraphs.¹⁶⁴

After people from Ukraine who are eligible for temporary protection status or dual nationals, accommodation providers may claim the state allowance by the following deadlines:

- ❖ Accommodation provider may claim an allowance for a month after the arrival of the person eligible for temporary protection or dual citizen from Ukraine or if the person who is eligible for temporary protection status submits the TP application within one month after his/her arrival in Hungary, the allowance may be claimed until the NDGAP has decided on the TP application.
- ❖ If the person eligible for TP does not lodge an asylum application, allowance beyond one month after arrival may be claimed by the accommodation provider, if the person who fled Ukraine is:
 - a pregnant woman, as from the date of the establishment of her pregnancy;
 - a parent of a child under six years of age;
 - a person with a disability and their caretaker;
 - a person aged 65 or over;
 - a person under 18 living in the same household as one of the above persons.
- ❖ If the applicant is recognised as a TP beneficiary, the accommodation provider, as a general rule, may be entitled to a daily allowance of HUF 5,000 per day until the end of the month following the month in which the TP status was granted. For dual nationals coming from Ukraine, the allowance

¹⁶⁰ No official information available on this. Assistance partners received this information via unofficial channels. Information appears on the website of UNHCR too, available [here](#).

¹⁶¹ Information recorded by the HHC during its June 2024 monitoring mission.

¹⁶² As a result of a legislative amendment enacted by Government Decree 337/2023 (VII.24) amending Gov. Decree 104/2022 (III.12); Section 4 of Gov. Decree 104/2022 (III.12).

¹⁶³ As a result of a legislative amendment enacted by Government Decree 337/2023 (VII.24) amending Gov. Decree 104/2022 (III.12).

¹⁶⁴ Sections 3, 3A-H and 4 of Gov. Decree 104/2022 (III.12). as were effective between 1 August 2023 and 20 August 2024.

is available until the end of the month following their arrival. After the following persons (recognised TP beneficiaries or dual nationals), the accommodation provider may continue to benefit from the allowance:

- pregnant woman, from the moment her pregnancy is established:
- a person under 18 and his/her parent living in the same household:
- a person with a disability and their caretaker:
- a person aged 65 or over.

On 28 June 2024, the government further restricted access to state-funded mass shelter of applicants and beneficiaries of temporary protection.¹⁶⁵ The amending rules came into full effect on 21 August 2024 and prescribe that only - the above listed - vulnerable beneficiaries of temporary protection who resided in a “territory impacted by war” remain eligible for state-funded mass shelter, within the timeframes given above.¹⁶⁶ The list of oblasts the government considers to be a “territory impacted by war” is supposedly published, based on unclear criteria, at the beginning of each month on an official government website.¹⁶⁷ The law only states that war-affected areas are ‘administrative units of Ukraine directly concerned by military operations’,¹⁶⁸ but apart from that, no distinctive criteria is set. The question of which regions in Ukraine are to be deemed “war-affected” is to be decided together by the Government Commissioner responsible for persons fleeing to Hungary from the Russian-Ukrainian war, the Minister responsible for Defence and the Minister responsible for Foreign Policy. At the time of writing (February 2025), these regions include: Dnipropetrovsk, Donetsk, Zaporizhzhia, Kyiv Oblast and Kyiv city, Mykolaiv, Odesa, Sumy, Kharkiv, Kherson, Chernihiv, Luhansk, Zhytomyr, the Autonomous Republic of Crimea.

Those falling outside the personal scope of eligibility criteria were allowed to submit leniency requests until 10 July 2024 to be able to remain in state-funded mass shelters. The leniency request was to be submitted to the respective defence committee, which then forwarded it to the Government Commissioner. The Government Commissioner could then give permission to the individuals in question to stay in a state-subsidized accommodation, in cases deserving special consideration.¹⁶⁹ It is not detailed in the law under which conditions a case deserves special consideration. More worryingly, the law remains silent on the situation of those who were not able to submit the leniency request till the said date, for instance, because they arrived in Hungary after 10 July. The HHC sent a freedom of information request to the Government Commissioner, inquiring about the number of those who submitted the request and also the number of granted/rejected requests. Based on the answer of the relevant ministry, 80 percent of the requests submitted by 1486 persons were rejected, in decisions lacking any legal formalities and reasoning.¹⁷⁰

Furthermore, according to these latest amendments, from 21 August 2024 onwards, only municipalities and the Maltese Charity Service will receive support for accommodating beneficiaries from Ukraine.¹⁷¹ All other accommodation providers will no longer receive support from the respective defense committee for hosting people from Ukraine. The HHC turned to the Maltese Charity Service in a freedom of information request, inquiring about the number of those individuals after whom the charity requested state support and also about the accommodation sites operated by them. The Maltese charity Service stated in its answer that - as of 23 October 2025 - they submitted their subsidy request after 918 persons and the run accommodation facilities in 24 locations (at one location there might be multiple accommodation facilities).¹⁷²

¹⁶⁵ Government Decree 134/2024 (VI. 28.) amending the rules of Gov. Decree 104/2022 (III.12).

¹⁶⁶ Section 3 of Gov. Decree 104/2022 (III.12.).

¹⁶⁷ Available here.

¹⁶⁸ Section 1(f.) of Gov. Decree 104/2022 (III.12.).

¹⁶⁹ Section 18(3) of Gov. Decree 104/2022 (III.12.).

¹⁷⁰ Information received from the Office of Prime Minister by the HHC on 6 September 2025.

¹⁷¹ Sections 4 and 8 of Gov. Decree 104/2022 (III.12.).

¹⁷² Information received from the Maltese Charity Service by the HHC on 23 October 2024.

If the person in need of accommodation does not belong to one of the above groups, allowance may only be requested if the beneficiary of TP or the dual citizen undertakes employment.¹⁷³ In this case, the allowance will be paid to the employer and not to the municipality or the accommodation provider.¹⁷⁴ The Ministry of Economic Development stated that, on 31 December 2024, the number of employees covered by the allowance given to employers was 166.¹⁷⁵ This support is available if the beneficiary of TP or dual citizen is employed in Hungary in a fixed-term or open-ended job, working at least 20 hours per week. This support is available for all TP beneficiaries and dual citizens from Ukraine, regardless of where they previously lived. The employer must apply for the support. If the employee has children under the age of 16, the support is contingent on the child attending school until the end of primary education, as verified by the school. The employer and landlord must sign a contract for the employee's accommodation. The employer is responsible for applying for the support, and the contract must be attached to the application. The employer must first pay the accommodation fee to the landlord before they can apply for housing support. The support starts once the employment contract, accommodation agreement, and application have been submitted. Employers can submit the application electronically through the National Employment Service or at the relevant government office based on the employee's work location. The amount of support matches the monthly accommodation fee outlined in the accommodation contract. The support ends if:

- the employment contract ends or is terminated,
- the employer fails to meet their obligations related to the support,
- the support should not have been granted in the first place,
- the accommodation contract is terminated, or
- the child's school attendance ends before finishing primary school.

The law also ambiguously states that, between 1 August 2023 and 20 August 2024, a person not eligible for assistance under the law shall be entitled to shelter and the infrastructure of the reception centre may also be used for accommodation.¹⁷⁶ This practically meant that the Vámoszabadi and Balassagyarmat reception centres (should have) accommodated some of those whom the accommodation provider could not claim allowance. According to the NDGAP, on 31 December 2024, there was no beneficiary of temporary protection accommodated in Balassagyarmat reception facility, while throughout 2024, there were 2, while in in the Vámoszabadi reception centre, there was 1 beneficiary throughout the year, but none on 31 December 2024.¹⁷⁷

Practical consequences of the legislative amendments of 2023-2024

Following the amendments of August 2023, being effective until 20 August 2024, families have been split up, as the new legislation states that allowance may be claimed in any case after 'a person under 18 and his/her parent living in the same household', but the noun 'parent' is used in singular. This meant that one parent could stay in the accommodation but the other had to leave. Many such cases have been reported to the HHC after September 2023. Although the change was supposed to foster integration by pushing adults to the labour market, it had the opposite effect.

The integration of families through schools and connections made had been abruptly halted, the consequences of which are unforeseen. The recent changes regarding the diminished amount of state support for accommodations affected almost every shelter the HHC team visited. Many families face insecurity due to the potential loss of accommodation for one or more family members, which also affects their mental health. In the experience of the HHC, the overall trend is that families choose to stay together, so if one family member has to leave the shelter, the whole family follows, even if there is no consequent accommodation option. Many accommodation providers did not agree with the new rules and tried to

¹⁷³ Sections 3/A-H of Gov. Decree 104/2022 (III.12.).

¹⁷⁴ See the section on Government support of employers below under Employment and education.

¹⁷⁵ Information received from the Ministry of Economic Development by the HHC on 11 February 2025.

¹⁷⁶ Section 3(7) of Gov. Decree 104/2022 (III.12.) as effective on 1 August 2023- 20 August 2024.

¹⁷⁷ Information received from the NDGAP by the HHC on 20 February 2025.

continue accommodating people even without state support, but as there is not any centralised and official statistical data about it, the number of those accommodation sites is unknown.

The exact number of people that were affected by the amendments that came into effect on 21 August 2024 is not known. Based on the regular monitoring missions of the HHC to accommodation sites, an estimated 3.000 beneficiaries of temporary protection lost their eligibility for state-funded shelter on 21 August, with cca. 1.000 continue to be accommodated under this scheme. In the experience of the HHC, the modified rules primarily affected those coming from the Transcarpathia region of Ukraine, many being single women with children, belonging to the Roma population. The implementation of the rules were not officially prepared: the rules were published on 28 June 2024, yet people affected had only 12 days to submit their leniency requests based on the new law. Without having been provided with official and targeted information by the government and relevant authorities, neither the people accommodated, nor the accommodation providers, knew how they were expected to proceed, whether there is a legal remedy against a potential negative decision that they receive after submitting the leniency request, if there was any alternative housing solutions they might access etc. As a result, on 21 August 2024, hundreds of families were evacuated and ended up on the brink of homelessness.¹⁷⁸ The HHC monitored the situation at multiple locations in September and August 2024. Some examples of the monitoring experience:

- Several families had already left and others were packing their belongings at a shelter in Érde when the HHC team arrived on 21 August. One man explained that his employer offered him a house for rental without any furniture where they were planning to spend the night. There was no contract signed, but he was required to pay a sizable deposit. The HHC team called humanitarian organisations to assist them with mattresses but could not find any. Among the families losing their accommodation were women with small children and some elderly as well.
- 120 people, 80 children and 40 adults were waiting in the main street of Kocs, as they were made to leave the Henzer Hostel early in the morning on 21 August. The accommodation provider gave breakfast and lunch to the people in the street. After some negotiation, he allowed the children to sleep in the courtyard for the night. The parents did not have enough place there. Apart from two families (who stayed with relatives for the night), the 120 people stayed in the courtyard of their previous shelter. The owner of their previous shelter designated a roofed section of the courtyard where children were allowed to borrow mattresses from the shelter, but due to the limited space, the adults spent most of the night awake. On 22 August, 3 families left for Ukraine in the morning because they felt their situation was hopeless. During the day, approx. 80 people remained on the street. Three buses arrived in Kocs at 4 PM and left for Dorog to temporarily accommodate people. A number of families were transferred to Enying. For unclear reasons and under unclear circumstances, about 70 people were transferred during the night from their shelter in Dorog to shelters in Esztergom-Kertváros.
- Four families in Tata are threatened to be evicted from their accommodation by the owner. They are unable to pay the required rent as they only have occasional work and many children. The rent is 160 000 HUF (approx. 400 EUR) / room plus 800 HUF / day for each person for utilities. The owner did not help them to submit their leniency requests and was of the opinion that they were not even eligible for it.
- Around 50 PoCs left the site in Vitnyéd-Csermajor before 21 August to unknown locations. Those staying at Vitnyéd (93 people of which 43 were children) are not at imminent risk of homelessness, but it is uncertain how long they may stay at the accommodation site. Police

¹⁷⁸ See the reports of some Hungarian media outlets about the events of 21 August 2024, for instance: Telex, *More than a hundred evicted Ukrainian refugees sit on the streets of Kocs, UNHCR is not happy*, 21 August 2024, available [here](#). Also see the press release of the HHC [here](#).

checks were conducted almost every day in August 2024. However, no police measures were taken. The people there have no intention to leave, except for a man who said he had bought a house and would move there with 30 others by the end of that week. People we serve said they are especially reluctant to leave because they do seasonal work around Vitnyéd and in Austria. The accommodation was otherwise in a dire condition.

The HHC also recorded some cases in August 2024 when people affected could solve their situation or were provided with housing solutions:

- At the “Bungaló” Hotel in Hajdúszoboszló, the HHC found that a total of some 70 people were accommodated. Approximately 20 people who were previously accommodated here were taken over by Dorcas Camping in Debrecen before 20 August. 7 people submitted another leniency request in order to be able to stay, the hotel management was informed by phone that these requests would positively be evaluated.
- At the ‘In Hotel’ in Hajdúszoboszló a total of 130 people were accommodated. The manager of the shelter reported that he had previously agreed with the Maltese Charity Service that the refugees could stay in the hotel. People in very vulnerable situations, such as cancer patients and their family members, without exception received a positive response to their request for leniency.
- The Strázsa tanya in Szabadszállás housing vulnerable refugees indicated to the HHC that they could still accommodate two vulnerable families. Everyone accommodated at the site received a positive response to their leniency requests.

Legal actions taken

As the Temporary Protection Directive requires that Member States ensure that beneficiaries of temporary protection have access to suitable accommodation, the above restrictions that came into effect on 1 August 2023 and 21 August 2024 are in clear violation of EU law. The introduction of the August 2024 restriction has also been done in a discriminatory manner, as while all TP beneficiaries flee from the war in Ukraine, only those will be provided with state-subsidized accommodation whose former residence is in an administrative district which is directly impacted by military operations. The law accordingly provides for differential treatment between two groups who are in a comparable situation, without a lawful justification.

The HHC submitted a complaint to the European Commission in December 2023 that was registered only in May 2024.¹⁷⁹ No further action has been taken since then by the Commission. Following the restrictions announced in June 2024, the HHC has submitted another complaint to the Commission on 5 July 2024, referring to the previous one relating to revocation of support for housing. To date, the HHC has not received an official response.

The HHC started litigation for people who lost their accommodation after 21 August 2024 on a national level too. The HHC provides legal representation to 130 people fleeing Ukraine (mostly women and their young children) in five cases (out of which three are joint cases of 72, 38 and 11 persons respectively) whose leniency request was rejected by the Government Commissioner responsible for refugees from Ukraine, and therefore lost their state-funded accommodation as of 21 August. While one procedure is still pending, in 3 other cases the Budapest Court quashed the decision of the Commissioner on formal grounds, for the decision not having been compliant with the legal requirements of an administrative

¹⁷⁹ 9CPLT(2024)01258.

decision.¹⁸⁰ The court also ordered the Commissioner to conduct new procedures resulting in formally correct decisions. The Court, however, did not decide on the merits of the issue - namely on the need to directly apply EU law governing the TP regime and hence providing for accommodation for TP beneficiaries, without allowing discretion in the matter. At the time of writing (28 March 2025), the repeated procedures have not yet been initiated. The HHC also represented a mother with 2 children, who arrived after 10 of July 2025, and thus could not submit a leniency request, asking the court to establish that as recipients of temporary protection (TP), they are eligible for state-funded accommodation. In this case the HHC argued that the plaintiffs' entitlement to state-subsidized housing is to be declared. The defendant in the case was the Government. This lawsuit, however, has been rejected by the court, with reference to the fact that the Government as an entity could not be a defendant in the procedure. It has been moreover argued by the court that there had not been any administrative action per se, only the fact that there was a law which was made by the Government, which - in case of application - would not result in the plaintiffs having entitlement to accommodation. This means that according to the judgment, the HHC tried to challenge the law itself and not the administrative action, hence, the court could not be competent.¹⁸¹

The HHC also represented a Hungarian media outlet, called Magyar Hang, in a lawsuit concerning the rejection of a freedom of information request that was sent by Magyar Hang to the Ministry of Foreign Affairs. The request aimed to obtain information on how "war affected areas" of Ukraine are defined and chosen by the Ministry and other relevant actors, as it is foreseen by Government Decree 104/2022 (III.12). As a result of the trial held on 13 March 2025, it turned out that there is no data stored by the Ministry with relation to any communication with other actors (ministries and Government Commissioner) concerning respective Ukraine regions, nor any information based on which some areas are deemed to be war affected, while others are not.¹⁸² This basically means that there is no trace of any official substantive and real governmental assessment of which areas in Ukraine are affected - mostly - by the war and which are not, and hence, who could be beneficiaries of state-subsidized accommodation as per the - otherwise EU law violating - provisions of Government Decree 104/2022 (III.12.)

Other housing solutions

The Charity Council members provided the following housing-related services:

According to Caritas Hungarica, in 2022, they provided thousands of people with accommodation at very diverse spots, ranging from clergy houses to private apartments run by or with the support of the charity.¹⁸³ It is unclear whether the Charity Council members have funded their services, including accommodation provided by them, exclusively through government allocated funds,¹⁸⁴ or through their private funds too. In 2023, they provided accommodation to 670 persons in Esztergom, Bicske, Iszaskaszentgyörgy, Balatonakali from government funds. In 2024, no such service was provided by them.¹⁸⁵ The Hungarian Interchurch Aid provided 693 persons with accommodation (16,425 nights) in 2022, 661 persons (18,634 nights) in 2023 and 120 persons (21,726) in 2024. This service was partially funded by own resources.¹⁸⁶ The Hungarian Reformed Church Aid provided accommodation in 4,666 cases in the period from 24 February 2022 to 31 December 2023.¹⁸⁷ The Hungarian Red Cross provided accommodation for 3,466 persons in 2023 and since August 2023 – when the legislation concerning the accommodation of

¹⁸⁰ Pending case before the Szeged Court: n. 2.K.700.024/2025. Judgments of the Budapest Court: 14.K.702.978/2024. and 14.K.703.627/2024. of 12 February 2025, judgment in case nr egyesítés 29.K.703.008/2024. of 19 March 2025.

¹⁸¹ 29.K.703.014/2024/25. of 18 February 2025.

¹⁸² See the judgment of Budapest Court nr. 36.P.20.684/2025/6-II. of 13 March.

¹⁸³ Information received from Caritas Hungarica on 23 January 2023.

¹⁸⁴ The Hungarian Government announced on 5 March 2022 that members of the Charity Council would receive 3 billion forint. The official press release can be found [here](#). In the Act XXV of 2022 on the central budget of Hungary for 2023 there is 1,218 billion forint allocated to the Charity Council, see [here](#).

¹⁸⁵ Information received from Caritas Hungarica on 22 February 2024 and 10 February 2025.

¹⁸⁶ Information received from the Hungarian Interchurch Aid by the HHC on 2 April 2024 and 7 February 2025.

¹⁸⁷ Information received from the Hungarian Reformed Church Aid by the HHC on 20 March 2024.

temporary protection beneficiaries became stricter – they assisted 651 persons in finding housing solutions.¹⁸⁸ The Red Cross and the Reformed Church provided no data concerning 2024.

NGOs, private entities and individuals from the civic sphere have also mobilised themselves in an exceptional manner and assisted many Ukrainians in finding or by providing accommodation. Kalunba, a Budapest-based NGO, reported, for instance, that they provided 161 individuals with temporary accommodation for a total of 501 nights, and also could provide 31 apartments for rent for a total of 180 individuals in the period between 1 June 2022 and 6 February 2023. No report arrived from Kalunba concerning 2024.¹⁸⁹

The Jesuit Refugee Service provided housing-related services to 1,176 people in 2023 and provided accommodation support to 699 persons in 2024. This primarily meant financial contributions to housing costs. The Service highlighted concerning 2024 that from a survey they conducted within their clients they learned that the housing situation of Ukrainian refugees in Hungary remained precarious, exacerbated by high rents and limited supply. Despite the continued efforts of NGOs and support agencies, there are few affordable and stable housing options. Long-term housing, meanwhile, was among the top five most pressing concerns among respondents, with older respondents indicating a greater need for stable housing, as did single mothers. Housing stability remained a concern, with more than half of respondents unsure how long they would be able to stay in their current accommodation. Discrimination experienced by clients when looking for housing remained a recurring problem.¹⁹⁰

The Evangelical Lutheran Diakonia supported 600 Ukrainian families to find housing solutions in the following manners:

- they provided rent assistance for people living in private accommodations
- financial assistance for people living in official accommodation sites. The charity also accommodated families in their own premises and provided emergency night shelters to persons in crisis situation.¹⁹¹

UNHCR conducted a multi-sectoral needs assessment in September 2022 with the participation of 512 respondents (83% Ukrainian refugees, 15% Hungarian-Ukrainian dual citizens, and 2% third-country nationals). Although it is emphasised that the result cannot be considered representative for the challenges of reaching out to private households, the paper found that 'one in three interviewees is residing in private accommodation and the percentage differs based on the location of residence; 61% of the refugees surveyed in Budapest are staying in private accommodation (7% in the rest of the country), while 74% of the refugees surveyed outside of Budapest are accommodated in collective sites, followed by hotels/hostels (18%)'.¹⁹² The same assessment was conducted by the UNHCR in 2023,¹⁹³ with the following result: 60% of the surveyed households live in private settings and 18% of households are in workers' accommodation, defined as arrangements provided by employers. Collective sites, often offered by the government or charitable organisations, house 14% of the respondents while 8% reside in hotels/hostels.¹⁹⁴ As to 2024, UNHCR reports that the proportion of refugees in private and shared accommodation presents a continued reduction of refugees hosted in collective sites (from 14% to 9%) and an increase in private accommodations (from 43% to 58%). The report emphasises that "while the shift reflects refugees' efforts to secure longer-term housing, it is important to note that 2023 data was collected before the government limited subsidized accommodation to vulnerable groups, contributing to

¹⁸⁸ Information received from the Hungarian Red Cross by the HHC on 22 February 2024.

¹⁸⁹ Information received from Kalunba organisation by the HHC on 6 February 2023.

¹⁹⁰ Information received from the Jesuit Refugee Service by the HHC on 12 April 2024 and 27 February 2025.

¹⁹¹ Information received from the Evangelical Lutheran Diakonia by the HHC on 28 February 2025.

¹⁹² UNHCR, *Hungary: Multi-Sectoral Needs Assessment*, November 2022, available [here](#).

¹⁹³ The assessment, guided by the Refugee Coordination Forum (RCF), involved nearly 700 adult respondents from refugee households across 18 counties in Hungary.

¹⁹⁴ UNHCR, *Hungary: Multi-Sectoral Needs Assessment, Final Report*, December 2023, available [here](#), 30.

the decrease in collective housing. Additionally, the 2024 data may overestimate the shift due to more limited access to refugees in collective sites.”¹⁹⁵

Access to reception facilities

Temporary protection beneficiaries,¹⁹⁶ applicants,¹⁹⁷ as well as Hungarian-Ukrainian dual citizens¹⁹⁸ as explained earlier, are entitled to access reception conditions. Pursuant to Section 26 (1) of the Asylum Act, ‘reception conditions include material reception conditions, and all entitlements and measures defined in an act of Parliament or Government decree relating to the freedom of movement of applicants, as well as health care, social welfare and the education provided to applicants.’¹⁹⁹ Beneficiaries in need are entitled to ‘material reception conditions and to care and support, in accordance with specific other legislation’²⁰⁰ (for specific entitlements within reception conditions see [Residence Permit](#)). According to the Asylum Decree, the implementing law of the Asylum Act, material conditions are accommodation and care provided at the reception centres, the use of travel discounts, and payment of the costs of the public burial of applicants for recognition.²⁰¹

Based on Section 41 (2) of the Asylum Decree beneficiaries of temporary protection may be entitled to accommodation and care. This provision, however, became non-applicable as of 1 August 2023 as a result of a legislative change.²⁰² This change affected the accommodation and care of beneficiaries, as it was partially explained above under the section ‘accommodation solutions’.

Although Section 32(2) of the Asylum Act, as mentioned, provides for the material reception conditions for beneficiaries if temporary protection “in need”, it is now unclear if there is a legal ground based on which accommodation and care (meals) are to be provided. In practice, those beneficiaries, after whom the accommodation provider is entitled to receive state allowance, are provided with meals 3 times a day at the accommodation sites. The situation of those beneficiaries of temporary protection, after whom the accommodation provider is not entitled to receive the allowance or who do not belong under (as explained above) is ambiguous. As a result of the mentioned legislative change, Section 3(7) of Gov. Decree 104/2022 (III.12.) ambiguously states that a person not eligible for assistance under the law shall be entitled to shelter and the infrastructure of the reception centre might also be used for accommodation. The wording of the provision suggests that accommodation in reception centres is only a possibility, not an obligation, in case other options are absent. The law does not, however, clarify, what other options would be available. Moreover, the Government decree stays silent on the issue of ‘care’, such as providing these beneficiaries of temporary protection with meals and basic hygiene.

As mentioned above the NDGAP stated that on 31 December 2023, there was only one beneficiary of temporary protection accommodated at the Városszabadi reception centre, while 2 were accommodated in total throughout 2023. Worryingly, the NDGAP also stated that “in the Városszabadi reception centre only those beneficiaries of temporary protection were accommodated throughout 2023, who, according to Section 3(7) of Gov. Decree 104/2022 (III.12), were not entitled to receive care (meals), but were only entitled to accommodation. They were provided with basic hygiene items, but in a few days, they left and their whereabouts was unknown.”²⁰³ Based on this statement of the NDGAP, it seems that for some unclear reasons, the authority interprets the law as obliging them to provide the beneficiaries in question

¹⁹⁵ UNHCR, *Hungary: Socio-Economic Insights Survey, Final Report*, October 2024, available [here](#), p. 33.

¹⁹⁶ Section 32 (2) of Asylum Act.

¹⁹⁷ Section 26 (2) of Asylum Act.

¹⁹⁸ Section 8 of the TP Decree.

¹⁹⁹ Section 26 (1) of Asylum Act.

²⁰⁰ Section 32 (2) of Asylum Act.

²⁰¹ Section 15 (2) of Asylum Decree

²⁰² Gov. Decree 337/2023 (VII.24.) amending the TP Decree by adding Section 5(4) providing that “Section 41(2) of the Asylum Decree shall apply with the exception that the beneficiary of temporary protection shall not be entitled to accommodation and care at the reception centre.”

²⁰³ Information received from the NDGAP by the HHC on 19 February 2024.

with hygiene items but not with meals. In the absence of food provision, it is unsurprising that those - only 1 or 2 persons - who went to the reception centre left after a very short time. The HHC was not granted leave to enter the premises of the Vámoszabadi reception centre despite requesting it from the NDGAP, with reference to the fact that those beneficiaries of temporary protection who were accommodated at the centre could reach out to the HHC “*outside the centre*”.²⁰⁴ In 2024, 2 beneficiaries of TP were accommodated in Balassagyarmat and 1 in Vámoszabadi,²⁰⁵ noting that after 20 August 2024, when further -above detailed restrictions - came into effect, the law did not provide any longer that “accommodation may be facilitated by the infrastructure of the reception facilities”.²⁰⁶

Reduction or withdrawal of reception conditions

The Asylum Act defines the circumstances in which reception conditions provided to a beneficiary of temporary protection may be reduced and withdrawn, that is when the beneficiary:

- ❖ is engaged in repeated or serious violation of the rules of conduct at the reception centre;
- ❖ is engaged in any repeated or serious breach of the obligation of cooperation;
- ❖ has disclosed false information or untrue facts concerning his/her assets or income, or if he/she refused to provide such information in the interest of obtaining the material reception conditions or the aid and assistance provided in accordance with the relevant legislation; or
- ❖ is engaged in seriously violent behaviour.²⁰⁷

Government Decree 104/2022 (III.12.) furthermore provides that if the person accommodated does not leave the accommodation upon the request of the accommodation provider (if it is a private accommodation, for instance) the accommodation provider may notify the police. The police may oblige the person to leave the accommodation and, upon request, transfers them to another accommodation designated by the local defence committee.²⁰⁸

Legislative changes amending Government Decree 104/2022 (III.12.)²⁰⁹ affected the situation of those whose TP application was rejected or renounced but submitted a subsequent application: these persons would not be entitled to be placed at emergency accommodation sites, but they could be placed in the reception centres until 20 August 2024.²¹⁰ From 21 August 2024 onward following further restrictions, this option has also ceased. If the TP status was renounced, this restriction did not apply to:

- ❖ a pregnant woman, as from the date of the establishment of her pregnancy;
- ❖ a parent of a child under six years of age;
- ❖ a person with a disability and their caretaker;
- ❖ a person aged 65 or over;
- ❖ a person under 18 living in the same household as one of the above persons, until 20 August 2024²¹¹

Tasks related to the provision of reception conditions are to be carried out by the asylum authority.²¹² In order to carry out reception-related tasks more efficiently, the asylum authority may conclude contracts

²⁰⁴ Request to grant entry was sent to the NDGAP on 13 September 2023 by the HHC, rejection of the NDGAP was received by the HHC on 15 September 2023.

²⁰⁵ Information received from the NDGAP by the HHC on 20 February 2025.

²⁰⁶ Gov. Decree 104/2022 (III.12) as effective on 20 August 2024.

²⁰⁷ Section 32/A (1) a.)- d.) of Asylum Act.

²⁰⁸ Section 6 of Gov. Decree 104/2022 (III.12.)

²⁰⁹ Changes effective as of 1 March 2024, introduced by Gov. Decree 30/2024 (II.22) amending Government Decree 104/2022 (III.12.)

²¹⁰ Sections 3 (8) and (10) of Gov. Decree 30/2024 (II.22).

²¹¹ Section 3 (9) of Gov. Decree 30/2024 (II.22).

²¹² Section 12 (2) of Asylum Decree.

with in particular, a non-governmental organisation, a local authority, church, a foundation, an institution of the mentioned entities, a company or any other legal entity to provide:

- ❖ the applicant with the material conditions for admission;
- ❖ the benefits falling within the material reception conditions to which the beneficiary is entitled;
- ❖ the social and mental health care to applicants and beneficiaries;
- ❖ information on the rights and obligations of the applicant and beneficiary;
- ❖ Hungarian language course to beneficiaries.²¹³

There is no official data available as to the number and capacity of those state-run accommodation sites which are dedicated to temporary protection beneficiaries. Concerning the years 2022-2023, the HHC sent a freedom of information request to the relevant ministries inquiring about the matter, but none of the ministries engaging in the crisis response (Ministry of Interior, Prime Minister's Cabinet Office, Prime Minister's Office, Ministry of Economic Development) could answer the HHC's housing-related question, stating that they do not qualify as official owners of these data. At the time of writing, it is legally unclear which central government body is responsible to ensure compliance with the TPD's reception condition requirements, and no law specifies it. As to 2024, the Prime Minister's Office sent data with regard to the number of contracts which were conducted between the Maltese Charity Service and respective defence committees and on the locations where state-subsidized accommodation are operated by the Maltese Charity Service (as explained above under Housing - accommodation solutions).²¹⁴ It can be therefore concluded that housing tasks belong - at least partially - to the Prime Minister's Office.

In the HHC's experience, the very essential material reception conditions are generally accessible by those entitled. A disturbing occurrence, however, was recorded by the HHC staff on 4 August 2022 in the border area. Namely, persons of concern belonging to the Roma community stated that they did not receive any type of assistance in **BOK** Centre Budapest in spite of having requested it. The other issue to be highlighted is that the quality of the service provision may differ by locations, which is a direct consequence of the absence of coordination of services and service providers on a national level. As most accommodation sites are run by different entities, under different circumstances (e.g., some municipalities are in better financial situation than others), the level and the quality of assistance offered to the population varies significantly across the various shelters.

Living conditions

The increased utility costs put all accommodation providers under serious financial pressure and some of the accommodation sites had to close due to this. Consequently, the accommodated people then had to move to new locations, despite the fact that their children had already been enrolled in schools. In 2022, the HHC monitors reported in some locations that people lack basic food and non-food supplies.²¹⁵ At the accommodation site in **Vitnyéd-Csermajor** conditions were degrading, food and hygiene items were lacking, and health care provision was also dissatisfactory.²¹⁶ Conditions in this accommodation site were similarly degrading in 2023 and 2024. Concerning 2023, the following issues of concern were observed by the HHC monitors at the accommodation sites:

- ❖ The reception conditions at the Uszka accommodation site remain poor.²¹⁷ The room where people sleep is extremely overcrowded and conditions are generally degrading.²¹⁸
- ❖ Bed bugs at the Gardony accommodation site.²¹⁹

²¹³ Section 14 (2) a.)-e.) of Asylum Decree.

²¹⁴ Information received from the Prime Minister's Office by the HHC on 6 November 2024.

²¹⁵ 5 September 2022 HHC monitoring mission report, Uszka.

²¹⁶ 21-22 November 2022 HHC monitoring mission report, Vitnyéd-Csermajor.

²¹⁷ 12-13 July HHC monitoring mission report, Uszka.

²¹⁸ 13-14 March HHC monitoring mission report, Uszka.

²¹⁹ 31 Jan_2023 HHC monitoring mission report, 2484 Gárdony Üdülők útja 27. – Piramis Hotel.

- ❖ Building in need of renovation of old wiring.²²⁰
- ❖ There is no internet connection in Fülöpösdaróc.²²¹
- ❖ The Páty accommodation site, since it is close to the highway and it is not in the village, is isolated. There are no transfer or other transport opportunities to use to get into Páty or elsewhere. People are therefore unable to manage their everyday life (e.g., go to work, immigration office etc), unless they have a car.²²² Thus the children have no access to kindergarten or schools.²²³
- ❖ Páty accommodation site is very remote and is seriously hindering the integration efforts of PoCs (accessing education, healthcare and employment).²²⁴
- ❖ Seriously ill patients living in inhumane conditions were placed in the two dilapidated houses in Kisléta.²²⁵
- ❖ In the Vitnyéd-Csermajor accomodation, the building is poorly maintained, wires and cables are hanging out of walls, which could be a safety hazard, especially as there are many children here. The building is poorly maintained, wires and cables are hanging out of walls, which could be a safety hazard, especially as there are many children here.²²⁶
- ❖ People from the opposite sex, who are not related, are accommodated together in Kisléta and Mérk.²²⁷ The most worrying incident registered by the HHC concerned a beneficiary of temporary protection woman.
- ❖ The Kocs accommodation site is surrounded by a fence, although PoCs can freely access and exit the site. People live in container homes.²²⁸
- ❖ Ercsi accommodation is quite crowded.²²⁹
- ❖ The bathing area in a Szigetszentmiklós accommodation site was very unsanitary, close to unusable, the rooms seemed to be crowded and under-equipped.²³⁰
- ❖ No meals are provided at the Békés accommodation site.²³¹
- ❖ At the Celldömölk, Fonyód, Vértesszőlős and Oroszlány accommodation sites, people are in need of any type of donation (hygiene items, diapers, clothing, food).²³²

Concerning 2024, the HHC did not conduct as extensive monitoring visits as it did over the previous years, therefore, accommodation conditions were not as closely monitored and substantive observations cannot be analysed for the purpose of this report.

Subsistence allowance

Another issue of great concern has been the inconsistent receipt of the monthly subsistence allowance. This was a frequently reported and constant issue in 2022 and 2023 and there were some reports also from 2024, although less than in the previous years.²³³ Beneficiaries of temporary protection have regularly complained to the HHC about either not receiving the subsistence allowance at all despite requesting it or receiving it with a great delay. In some cases, the subsistence allowance arrived in one month but was absent in the following months. Families also reported that while they requested the

²²⁰ 31 Jan 2023_HHC monitoring mission report, 2484 Gárdonyi Üdülők útja 27. - Píramis Hotel.

²²¹ 13-14 February 2023_HHC monitoring mission report, Fülöpösdaróc Social Care Home.

²²² 20-21 February 2023 HHC monitoring mission report, Páty, Gastland M1 Hotel.

²²³ 12-13 June 2023 HHC monitoring mission report, Páty, Gastland M'.

²²⁴ 24-25 April 2023_HHC monitoring mission report, 2071 Páty, hrsz. 0161/17 (Gastland Hotel M1).

²²⁵ 30 March 2023_HHC monitoring mission report, Kisléta.

²²⁶ 12-13 June 2023HHC monitoring mission report, Vitnyéd Csermajor.

²²⁷ 19-20 June 2023 HHC monitoring mission report, Kisléta Pócsi út 52, 4325, 19_20_JUN_HHC monitoring mission report, Mérk Hunyadi u.183.

²²⁸ 21-22 August 2023HHC monitoring mission report, Kocs, Kossuth Lajos u. 9.

²²⁹ 18-19 September 2023HHC monitoring mission report, Ercsi, Cukorgyári ltp. 3.

²³⁰ 18-19 September 2023HHC monitoring mission report, Szigetszentmiklós Viola utca 12.

²³¹ 2-3 November 2023 HHC monitoring mission report, Békés, Jantyik utca 6/2. – „MPS Cigánymisszió”, Kevermes, Jókai utca 98. - „MPS Cigánymisszió”.

²³² 21-22 August 2023 HHC monitoring mission report, 12-13 October 2023 HHC monitoring mission report.

²³³ The issue was recorded by the HHC during its monitoring missions in Kevermes (May, 2024), Erd (April 2024) and in Szentes (May 2024).

subsistence allowance together, some family members received it, while others did not (typically the subsistence allowance requested for minor children).

In its 2022 multi-sectoral needs assessment report, the UNHCR noted that out of 512 respondents 93% had been granted temporary protection, and those granted protection had received this financial assistance at least once.²³⁴ The UNHCR added that this does not mean that the allowance is currently received or that it has been received regularly. In 2023, UNHCR's multi-sectoral needs assessment reported that 56% of surveyed households acknowledged receiving subsistence allowances upon their arrival, while 28% reported such allowances in the last 30 days since the survey took place.²³⁵ In 2024, the UNHCR did not conduct a survey in this regard. The HHC requested data in 2022 from the Ministry of Economic Development on the number of beneficiaries receiving subsistence allowance, but the Ministry stated in its response that they did not have this information.²³⁶ In 2023, upon the same request, the Ministry stated that by December 2023, there had been 10,967 request for subsistence allowance submitted from beneficiaries of temporary protection.²³⁷ Concerning 2024, Ministry data appears to indicate that a monthly average of - little above - 4000 requests for subsistence allowance was submitted per month.²³⁸ As beneficiaries have the obligation to appear in front of the competent authority each and every month to be able to claim the subsistence allowance,²³⁹ this data suggest that there around 4000 beneficiaries at a time who may be entitled to claim the financial support. The Ministry did not state how many of these requests were granted. The director of NGDAP's asylum department suggested on 3 March 2023 to the representatives of HHC, that, according to his knowledge, a stable average of around 7,000 beneficiaries receive subsistence allowance on a regular basis in Hungary.

Moreover, until around September 2022, it was unclear to the relevant authorities (asylum authority and government/district offices) who was responsible for processing subsistence allowance requests. The HHC received numerous inquiries from people eligible for the subsistence allowance stating that neither the asylum authority nor the government/district office wanted to register their request for the subsistence allowance, claiming the other body was responsible for this. In 2023 and 2024, no such competency issues were reported or observed.

Accommodation of vulnerable people

As has been noted under [Guarantees for vulnerable persons](#), there has been no comprehensive screening for people with special protection needs,²⁴⁰ which often resulted in people being accommodated in inappropriate conditions with regard to their needs. In the experience of the HHC, people with disabilities or special medical needs have been frequently placed in shelters lacking the necessary medical/psychological assistance. The most notable case concerned a 65-year-old Ukrainian man met by the HHC team on 4 August 2022 in the **Fülpösdaróc** (village close to the border) accommodation site. The accommodation was not well-equipped and hygiene was completely absent. A total of 22 individuals were accommodated there at the time. They were generally in a poor mental and physical state, complaining about not receiving sufficient food provision. The said Ukrainian man, who was a beneficiary of temporary protection already, looked seriously underfed, he was barely able to speak. Following his arrival in Hungary, he had been diagnosed with lung cancer. It was apparent that he would have needed constant and special medical attention, which was absent in the accommodation site. HHC monitors were informed that no Hungarian health-care provider could accept the man, although operators of the accommodation site and staff members of IOM had tried multiple times, at various hospitals. As a consequence, as the HHC was later informed by the operators of the accommodation site, the man was

²³⁴ UNHCR, *Hungary: Multi-Sectoral Needs Assessment*, November 2022, available [here](#), p. 14.

²³⁵ UNHCR, *Hungary: Multi-Sectoral Needs Assessment, Final Report*, December 2023, available [here](#), p. 25.

²³⁶ Information received from the Ministry of Economic Development by the HHC on 27 January 2023.

²³⁷ Information received from the Ministry of Economic Development by the HHC on 19 February 2024.

²³⁸ Information received from the Ministry of Economic Development by the HHC on 11 February 2025.

²³⁹ Section 4 of Gov. Decree 103/2022 (III.12), please also see Employment and education below.

²⁴⁰ UNHCR, *Inter-Agency Operational Update Hungary*, 10 May 2022, available [here](#).

transferred back to Ukraine and was placed in a hospice near the border. His example is exceptional, but quite alarming as highlighting the potential deficiencies of the reception system with regard to the population with special needs. The **Fölpösdaróc** accommodation site was later renovated with the assistance of IOM and conditions became decent by October 2023.

In 2023, the most notable case highlighting all potential deficiencies of the accommodation scheme recorded by the HHC²⁴¹ concerned a Ukrainian woman who claimed to have been a victim of violence of sexual abuse at the Kisléta accommodation site. One house of the site accommodated only a woman and a man, who were not related. The man was disabled (missing the upper part of both feet). The woman - who had been diagnosed as paranoid schizophrenic by the medical institution in Nagykálló beforehand - complained of the man drinking, smoking, harassing and threatening her. She also stated that the man regularly abused her sexually when he got drunk. She repeatedly asked the volunteers and different workers attending them to move her to a different place but to no avail. She wrote a letter in Hungarian with the use of a dictionary to report the assaults to the police but did not know how to send it.

Regarding 2024, the HHC knew of one accommodation, (Strázsa Tanya at Szabadszállás) not sponsored by the state, which could tend to the needs of people living with disability or special medical conditions. The HHC has no information if there are any state sponsored accommodation available for vulnerable people.

Risks of human trafficking

As it has been similarly mentioned, no adequate preventive measures specifically targeting persons fleeing Ukraine have been implemented concerning the risks of human trafficking, although the arriving population mainly consisted of women and children and there is substantial lack of information (see [Guarantees for vulnerable groups](#)). The HHC's continuous monitoring visits in 2022 also revealed several relevant experiences by displaced persons, revealing potential exploitation patterns related to the Ukrainian crisis²⁴²:

- ❖ Two sisters from Kyiv informed the HHC that every evening a Hungarian woman from Zakarpattia talks to them and wants to offer them work, asking them to sign papers. The sisters did not find this lady trustworthy and felt intimidated by her.
- ❖ Several women, encountered during several monitoring visits informed the HHC that they were given job offers by online recruiters, who also offered them housing. Many of them found these job offers through a leaflet placed at their accommodation facility advertising a company called 'Safe in Hungary' (www.safeinhungary.hu). One woman informed the HHC team that the recruiters had told her that she could work for them, but her 20-year-old daughter would have to work too and, for this, she should stop her studies. After a background check, the HHC found this dubious recruitment campaign concerning. It was particularly worrying that the for-profit recruitment agency was posing as a humanitarian actor offering 'help', which was at odds with its actual character and motivation. Also, it was clear for HHC monitors that Ukrainian refugees lacked proper information and could be easily misled by these job offers that may not give them the same rights and choices as registering for temporary protection would. It appeared that accepting job offers from this company could 'divert' refugees from acquiring temporary protection and put them in a more vulnerable situation with an elevated risk of exploitation. This was observed in March 2022 in visits at Helping Points and accommodation centres in the border area. An investigative journalism portal later published an

²⁴¹ Recorded first by the HHC on 20 June 2023 at Kisléta during HHC's monitoring mission.

²⁴² HHC's experience of 2022 in this regard is summarised in a thematic paper called "Labour exploitation encountered in the framework of the Ukraine refugee crisis response of the Hungarian Helsinki Committee", January 2023, available [here](#).

article²⁴³ revealing the close ties of this company to the Hungarian government, which can explain their exclusive placement at Helping Points on the Ukrainian-Hungarian border.

- ❖ Some Ukrainian refugees complained of being employed without the necessary permits by a company called 'Prohuman' (which is the one mentioned under the previous point, operating the www.safeinhungary.hu website). A woman informed the HHC that her uncle who worked for this company did not have any residence permit and that the company refused to initiate the relevant procedures.
- ❖ Some Ukrainian refugees informed the HHC that, after arrival, the men among them worked for 2 weeks for a local person who disappeared without paying their salaries (3 million HUF altogether).
- ❖ The HHC visited a former hotel, which functioned as an accommodation site for Ukrainian refugees, and which was in a very run-down state, offering dubious living conditions. The manager of the site was overtly hostile to the HHC monitors, not allowing them to enter and saying that 'there is no need to worry, people accommodated here are all employed and paid well'. Due to his resistance to provide access and hostile behaviour, the HHC monitors considered that working conditions offered to persons hosted at this site may be inadequate.
- ❖ An HHC monitoring team talked to a woman with a small child, who arrived in Hungary after acquiring temporary protection in Romania. She was robbed in Romania, and thus had no identity documents. She was offered a job and accommodation by a stranger on the internet, which raised some concerns about unlawful employment and exploitation, given that she had no identity documents, nor a proof of her temporary protection status in the EU.

There are also risks of labour exploitation, as described below in [Access to the labour market](#).

E. Employment and education

1. Access to the labour market

A temporary protection beneficiary or applicant has the same rights regarding employment as Hungarian citizens do, except in the public service and civil servant sector where Hungarian citizenship is a requirement.²⁴⁴ According to the TP Decree, beneficiaries and applicants may work in the territory of Hungary without special permission, including temporary employment and public employment.²⁴⁵ This has not always been the case as when the TP Decree came into effect on 8 March 2022, only beneficiaries had this right and only in certain sectors of the labour market as defined in the communication of the competent minister.²⁴⁶ This regulation was amended and consequently, not only beneficiaries, but applicants could also be employed in the jobs specified in the mentioned communication.²⁴⁷ This regime was in effect from 23 March to 29 April 2022. Since 30 April 2022, as a result of another legislative change, it is possible for both beneficiaries and applicants to be employed in any sector, without any limitation.²⁴⁸

²⁴³ Atlatzso, 'Kormányközeli munkaerő-toborzó cég hirdethet az ukrán menekülteknek az állami központokban', 31 March 2022, available in Hungarian at: <http://bit.ly/3HZzMdq>.

²⁴⁴ As provided in Section 39 (1) of Act CXCV of 2011 on Public Service Officials and Section 20 (1) c.) of Act XXXIII of 1992 on Civil Servant Status.

²⁴⁵ Section 6(4) and Section 7 of the TP Decree.

²⁴⁶ NGM Communication on the authorisation of the employment of third-country nationals in Hungary on the basis of a non-aggregated application procedure, on the exemption from the obligation to obtain an authorisation, on the cooperation of the labour office of the metropolitan and county government office in the aggregated application procedure, and on the notification of the employment of third-country nationals who are employed in Hungary without authorisation and on the reimbursement of wages pursuant to point 26 of paragraph (1) of Article 15 of Government Decree 445/2013 (28.XI.), available in Hungarian [here](#).

²⁴⁷ TP Decree as amended by Section 2 of Government Decree 112/2022 (III.22).

²⁴⁸ TP Decree as amended by Section 1 of Government Decree 175/2022 (IV.29).

To be employed, the applicant or the beneficiary has to be at least 16 years old.²⁴⁹ The employer shall notify the immigration authority of the employment of a person under the TP Decree.²⁵⁰ The employer is required to ascertain on or before the first day of employment that the person holds a TP card (if beneficiary) or a humanitarian residence card (if applicant) and shall make a copy of the permit which is to be kept for the entire duration of employment. The employer is then to notify the immigration authority of the start of employment and also of its termination. The detailed rules of notification procedure are set out in the Act II of 2007 on the entry and stay of third-country nationals.²⁵¹

Since 29 April 2022, a person who intends to receive the subsistence allowance and who is eligible for employment must register as a service claimant (in Hungarian it is phrased as *foglalkoztatásba bevonható személy*, which would translate as ‘a person who can be employed’) with the district office and cooperate with the district office before receiving the first regular subsistence allowance.²⁵² A person who is eligible for employment shall accept an offer for a suitable job, including public employment, in cooperation with the district office, within 45 days of receiving the first regular subsistence allowance.²⁵³ A person eligible for employment is not obliged to accept the job offered to them if:

- ❖ at the time of the offer of employment, they are in an employment relationship with an employer in Hungary and the employer in Hungary can prove it, or
- ❖ they provide care for a minor under the age of three, or
- ❖ they are enrolled in full-time school education and have not reached the age of 18.²⁵⁴

The integration of healthcare professionals has been facilitated by the government by introducing some rules which make it easier for the healthcare professionals who fled Ukraine to start working in Hungary. Government Decree 121/2022 (III.28.) provides that a person holding a health professional qualification obtained in Ukraine, on the basis of a state-recognised qualification and academic degrees, shall - notwithstanding the provisions of Act CLIV of 1997 on Health Care (hereinafter referred to as the - be entitled to perform health care activities without the naturalisation or recognition of his/her professional qualification or professional qualifications in Hungary, even before the recognition or naturalisation procedure has been completed. This person shall, no later than the commencement of the health care activity, be obliged to apply for recognition of the professional qualification or academic degree attested by the certificate or diploma issued in Ukraine in accordance with the provisions of the Act on the Recognition of Foreign Certificates and Diplomas of Act C of 2001 (Recognition Act), but, notwithstanding Article 6(3) of the Recognition Act, the recognition or naturalisation procedure is not subject to the condition of a residence permit issued for the purpose of employment or family reunification.²⁵⁵

Government support to employers

In order to facilitate access to the labour market of temporary protection beneficiaries and applicants, the government enacted, in 2022, a series of decrees concerning the support of those entities who employ these groups.

Between 11 March 2022 and 31 August 2023, the Government provided support to employers to facilitate the employment in Hungary of persons with Ukrainian citizenship or dual Ukrainian-Hungarian

²⁴⁹ Section 1 b.) of Government Decree 106/2022. (III. 12.).

²⁵⁰ Section 6 (6) of the TP Decree.

²⁵¹ Section 71 of Act II of 2007 on the entry and stay of third-country nationals.

²⁵² Section 2 (3) of Government Decree 106/2022 (III.12) as amended by Section 9 of Government Decree 170/2022 (IV.29).

²⁵³ Section 2 (5) of Government Decree 106/2022 (III.12).

²⁵⁴ Section 2 (7) of Government Decree 106/2022 (III.12).

²⁵⁵ Section 2 of Government Decree 121/2022 (III.28.).

citizenship.²⁵⁶ The Ministry of Economic Development stated that between 11 March 2022 and 31 August 2023 the number of employees covered by the support to employers was 2436.²⁵⁷

Since 1 August 2023, as a result of a legislative change,²⁵⁸ employers can no longer claim any support for employing people who fled Ukraine but they may claim a housing allowance after those beneficiaries of temporary protection who they employ. Rules may be summarised as follows:²⁵⁹

Allowance is paid if the temporary protection beneficiary or dual national works in Hungary for a fixed or indefinite period, for at least 20 hours a week. The allowance must be claimed by the employer. If the employee has a child under the age of 16, the allowance is conditional on the child attending school until the end of primary school, as certified by the school. The accommodation provider and the employer must conclude a contract for the accommodation of the worker. The employer must apply for the allowance and this contract must be attached to the application. Under the contract, the employer must first pay the accommodation fee to the accommodation provider and only then is the employer entitled to claim the housing allowance.

The application for the allowance can be submitted electronically using the form published on the National Employment Service's website²⁶⁰ or to the government office responsible for the place where the employee is employed. The allowance is paid to the employer on a monthly basis and is normally equal to the monthly accommodation allowance under the accommodation contract.

The allowance shall cease if

- ❖ the employment relationship ceases or is terminated,
- ❖ the employer fails to fulfil his obligations in respect of the allowance,
- ❖ the allowance could not have been established in the first place,
- ❖ the accommodation contract is terminated or cancelled,
- ❖ a child under 16 years of age living in the same household as the worker ceases to be a pupil before leaving primary school.

The Ministry of Economic Development in its response to the HHC's freedom of information request asking for the number of registered employment-seekers with international protection stated that as of 31 December 2024, 3 beneficiaries of TP were registered as employment-seekers.²⁶¹

Labour market integration opportunities organised by the civic sphere

Organisations in the civic sphere provided numerous labour market integration opportunities for Ukrainian refugees.

According to the Hungarian Maltese Charity Service, their project called 'Work for you' has been set up specifically for the labour market integration of third-country nationals and is accessible for applicants and beneficiaries of temporary protection too. In 2022, 14 beneficiaries of temporary protection participated in their programme called MMIA, which is a housing project but also provides labour market assistance services. The Hungarian Maltese Charity Service furthermore reported that they had run their labour market integration programme in 2023. They had 15 beneficiaries of temporary protection clients within their programme, of which 3 persons managed to get employed with their help. They also reported that the programme called 'Incopora', run by the one of the non-profit companies established by the Maltese

²⁵⁶ Based on Section 1 of Government Decree 96/2022 (III.10), which is not in effect since 1 August 2023..

²⁵⁷ Information received from the Ministry of Economic Development by the HHC on 20 February 2024.

²⁵⁸ Introduced by Government Decree 337/2023 (VII.24.) amending the provisions of Government Decree 104/2022 (III.12.).

²⁵⁹ Sections 3/A-3/H of Government Decree 104/2022 (III.12.)

²⁶⁰ Available [here](#).

²⁶¹ Information received from the Ministry of Economic Development by the HHC on 11 February 2025.

Charity Service, helped beneficiaries to get integrated into the Hungarian labour market by providing them with mentoring.²⁶² The Charity operated various labour-integration services and programmes also throughout 2024.²⁶³

Menedék Association runs a complex integration programme involving facilitation of access to the labour market, information provision for employers, mediation of intercultural conflicts in the workplace. Menedék Association moreover reported that within their common project with IKEA they supported the labour market integration of Ukrainian refugees throughout 2022.²⁶⁴

The Evangelical Lutheran Diakonia also ran their labour-integration services via the 'Workconnect' programme in 2024. In 2024, they also provided adult training for 24 people: personal and property guard, nanny, manicure, eyelash and photographer training.²⁶⁵

Since September 2023, IOM Hungary has been also offering individual and group counselling, as well as thematic workshops in the area of labour market integration. In November, IOM – along with UNHCR – organised a Job Fair with the aim of connecting temporary protection beneficiaries, as well as third-country nationals with other legal statuses with interested companies and potential employers.²⁶⁶ As to 2024, no report has arrived from IOM.

The Hungarian Red Cross also provided assistance and counselling concerning labour market integration in 2023. In 2024, no report arrived from them.²⁶⁷

Barriers to employment

No information (practical or legislative in nature) is known to the HHC indicating that beneficiaries of temporary protection would not enjoy equal treatment as Hungarian nationals with regard to employment. The Act CXXV of 2003 on equal treatment and the promotion of equal opportunities prohibits employment related discrimination based on nationality or the use of mother tongue.

Discrimination based on a genuine and determining occupational condition which is justified by the nature of the work or working conditions, pursuing a legitimate aim and is proportionate, and discrimination based on religion or belief, or on national or ethnic origin, directly arising from an ethos which is fundamental to the nature of the organisation, justified by the content or nature of the particular occupational activities, and which is proportionate and based on a genuine occupational requirement, do not constitute a breach of the requirement of equal treatment.²⁶⁸

Naturally, however, the most recurrent reasons for unemployment in the population of concern are the inability to find work due to lack of language skills, especially among those not accommodated at collective sites and having master degrees.²⁶⁹ Menedék Association also points out that the expectations of employers and the reality of Ukrainian refugees are not corresponding as most labour market programmes aim at involving highly-qualified individuals with more diverse language skills.²⁷⁰ Next Step Hungary Association suggested that in 2022 labour market integration of Ukrainian refugees was also hindered by the fact that there were not enough institutions carrying out skill validation, therefore, otherwise

²⁶² Information received from the Hungarian Maltese Charity Service by the HHC on 26 February 2024.

²⁶³ Information received from the Hungarian Maltese Charity Service by the HHC on 19 January and 2 February 2023 and 10 February 2025. More information is available [here](#).

²⁶⁴ Information received from Menedék Association by the HHC on 28 February 2023.

²⁶⁵ Information received from the Evangelical Lutheran Diakonia by the HHC on 28 February 2025.

²⁶⁶ Information received from the IOM by the HHC on 21 February 2024.

²⁶⁷ Information received from the Hungarian Red Cross by the HHC on 22 February 2024.

²⁶⁸ Section 22 (1) of Act CXXV of 2003 on equal treatment and the promotion of equal opportunities.

²⁶⁹ UNHCR, *Hungary: Multi-Sectoral Needs Assessment*, November 2022, available [here](#), 16.

²⁷⁰ Information received from Menedék Association by the HHC on 28 February 2023.

experienced people could not substantiate their qualifications.²⁷¹ The Next Step Association submitted no report as to 2024.

Menedék Association highlighted that in 2023-2024 the challenge in the arena of for-profit companies was that the labour market expectations and realities were different, in many cases the programmes targeted highly qualified people, but the lack of language skills (Hungarian and English) prevented those who have fled Ukraine from joining these programmes.²⁷²

The IOM reported in 2023 that beneficiaries with temporary protection faced obstacles when trying to integrate into the Hungarian labour market due to language barriers and a limited understanding of the Hungarian labour market and its associated legal frameworks. Besides, as noted by the IOM, the risk of overqualification of these individuals in the Hungarian labour market was very high. The early employment uptake has been concentrated in low-skilled jobs; therefore skills mismatches are widespread. According to IOM's data of 2023, respondents who have settled or intend to settle in Hungary and are of working age (18-64 years old) imply that 62% of respondents within the active population is employed, with 62% of women and 61% of men. In addition, less than half of the respondents (43%) indicated that their current job in Hungary corresponds to their educational background and professional experience. Among those whose academic and professional background did not align with their current employment, disparities were evident, with a significant proportion having tertiary education (74%), a smaller percentage with upper secondary education (19%), and respondents with post-secondary education accounting for 7%. Among these respondents, women with children experience a lower employment rate (57%) compared to those without children who have an employment rate of 66%. In addition, a notable disparity in employment rates was observed by the IOM among women caring for infants (0-4 years old) compared to those with children aged 5-17 years old. The employment rate is 52% for women with at least one infant, while it stands at 57% among women with children aged 5-17 years old.²⁷³ As to 2024, IOM sent no updates.

The Evangelical Lutheran Diakonia furthermore pointed out concerning 2023 that the situation of people with reduced working capacity is not resolved. In Ukraine, many people were demobilised at some level (out of 3 grades), which the Hungarian system cannot cope with.²⁷⁴

There is no official data available on how many temporary protection beneficiaries could access the labour market in Hungary so far. The ministry competent in employment matters stated upon the freedom of information request of the HHC that they did not have this data.²⁷⁵

Risks of labour exploitation

The presence of online recruitment agencies tackling fresh arrivals and those without a temporary protection status is particularly concerning, as well as the recruitment of workers for badly or unpaid seasonal, informal or other physical jobs. (Please also see the section of risks of human trafficking under Housing). UNHCR points out that people from Ukraine who find work, earn 35% less than the national average wage, further exacerbating economic insecurity.²⁷⁶

Menedék Association launched a project called SAFEmployment Hungary specifically to tackle and prevent the potential labour exploitation of the population fleeing Ukraine.²⁷⁷ Within the programme,

²⁷¹ Information received from Next Step Hungary Association on 6 February 2023.

²⁷² Information received from Menedék Association by the HHC on 21 February 2024 and 21 February 2025.

²⁷³ Information received from the IOM by the HHC on 21 February 2024.

²⁷⁴ Information received from the Evangelical Lutheran Diakonia by the HHC on 24 February 2024.

²⁷⁵ Information received from the Ministry of Economic Development by the HHC on 27 January 2023.

²⁷⁶ UNHCR, 2024 End-of-Year Report - Refugee Response Plan for the Ukraine situation, p 25, 19 March 2025 available [here](#).

²⁷⁷ Safemployment Hungary project on Menedék Association's website: [here](#).

Menedék Association initiated a four-language information campaign (in Hungarian, English, Ukrainian, Russian) conveying the most important information about the rights of employees, as well as how to recognise exploitation. Moreover, they provide complex help through their qualified social workers for victims of exploitation. This project of Menedék Association has also been promoted by the asylum authority on their website²⁷⁸ and physically on leaflets in the asylum client services. Within the project, Menedék Association produced 3 videos, raising attention to the dangers of labour exploitation.²⁷⁹

2. Access to education

Education in Hungary is a right and obligation for children who fled Ukraine: the law does not only provide education for foreign children (not only applicants and beneficiaries of temporary protection), but obliges them to take part in it. According to the Act on Public Education, children, in the year when they turn 3 years old until 31 August, are to go to kindergarten for at least 4 hours a day.²⁸⁰ In the year when the child turns 6 years old until 31 August, the child may be enrolled and is to attend school. This can be delayed by a year upon request of the parent. Education is compulsory until the end of the school year when the child turns 16 years old, but for children with special educational needs this may be extended until they turn 23 years old. The obligation to get education can be fulfilled in primary, secondary schools and also in schools for children with special needs.²⁸¹

The right to education of temporary protection applicant and beneficiary children is also foreseen by the Act on Public Education, which asserts that upon submitting the application, the child becomes entitled to take part in public education in kindergarten, dormitory care, specialised pedagogical services, school education until the end of his studies that begun before their age of eighteen. The law states that this may be done on the same conditions as Hungarian citizens.²⁸² A Government Decree also provides since March 2022 that if the temporary protection beneficiary cares for a minor, they are entitled to use the services of crèches, nursery cares and the services of the "Biztos Kezdet" children's home under the same conditions as Hungarian citizens.²⁸³ Lastly, in the set of legal instruments providing for the education of temporary protection beneficiaries, the Asylum Decree holds that the beneficiary is entitled to the reimbursement of the cost of education.²⁸⁴

Day care in crèches is regulated under Act XXXI of 1997 on child protection and childcare administration. The law provides that day care is mainly for the children of working parents, but other needs (e.g. children at risk due to their social situation or children of a single parent or a parent's illness, etc.) may be considered. However, it is generally subject to a fee depending on the family's income, and free of charge only on grounds of need.²⁸⁵

In the context of the temporary protection scheme, no measures were introduced concerning the education of young people. They are thus in the same situation as beneficiaries of international protection (see [General Report – Access to education](#)).

The competent central administrative body, the Office of Education, stated in its response to the HHC's information request that they only had data covering all foreign asylum-seeking, refugee or beneficiary of

²⁷⁸ Safemployment Hungary project on the NGDAP's website, [here](#).

²⁷⁹ Videos available [here](#), and [here](#).

²⁸⁰ Section 8(2) of Act CXC of 2011 on Public Education.

²⁸¹ Section 45 (2)-(3) and (5) of Act CXC of 2011 on Public Education.

²⁸² Section 92 (1) a.), (3)-(4) of Act CXC of 2011 on Public Education.

²⁸³ Section 3 of Government Decree 106/2022 (III.12).

²⁸⁴ 37/A (1) c.) and 45 of Asylum Decree.

²⁸⁵ Ministry of Human Resources, *Information to support families from Ukraine for family and child welfare service providers*, May 2022, available at: <https://bit.ly/3HXccxG>, 15.

temporary protection students, therefore, no data is available specifically as to child beneficiaries of temporary protection who accessed education in Hungary.²⁸⁶

The Office of Education stated in its response sent to the HHC in 2024 that they registered aggravated data concerning refugee and beneficiary of temporary protection children for the educational years of 2022-2023 and 2023-2024 as follows:²⁸⁷

Enrolled asylum-seeking, refugee and beneficiary of temporary protection children			
	2022/2023	2023/2024	2024/2025
Kindergarten	619	481	401
Elementary school	2,009	1,898	1805
High school	118	105	218

One of the main barriers in accessing Hungarian (public) education of any level may be the fact that people who fled from Ukraine do not know the Hungarian language. Legislation supports the beneficiaries of temporary protection in overcoming this barrier as the Asylum Decree provides that within twenty-four months from the date of recognition, the participation of the beneficiary of temporary protection in 520 hours of basic or intermediate Hungarian language course at an institution designated by the NDGAP is free of charge, if the person continues his/her studies in accordance with the conditions set by the institution or meets the examination requirements set by the language service provider.²⁸⁸ The law furthermore provides that once per grade and per type, a basic or intermediate Hungarian language examination of type "A", "B" or "C", organised by the institution designated by the asylum authority and recognised by the state, and a Hungarian language course for a beneficiary studying in full-time school education - until reaching the age of 18 - in the institution designated by the asylum authority is free of charge.²⁸⁹ The HHC requested data from the NDGAP regarding the implementation of the said provisions. The NDGAP stated in its answer that no institution was designated for Hungarian language courses, that no request was submitted to them by anyone concerning a Hungarian language exam and that no institution was designated specifically for the minor beneficiaries of temporary protection, should they wish to attend Hungarian language courses.²⁹⁰

Actors of the civic sphere recognised the need to teach Hungarian as a foreign language to Ukrainian students. As Menedék Association reports, the language barrier is the main reason for which Ukrainian children cannot perform in accordance with their skills and abilities. The Association points out that language difficulties are completely ignored by the unified admission system.²⁹¹ Teaching Hungarian as a foreign language is one of the main activities of the Jesuit Refugee Service which is aimed at supporting inclusion in Hungarian schools. In 2024, the organisation reported to have worked with 35 secondary school-age students per week in 5 different schools in Budapest and provided Hungarian language sessions for Ukrainian children visiting the Fényi Gyula Jesuit High School in Miskolc. Further, it offered weekly Hungarian as a foreign language classes and informal support talks for unaccompanied minor children in the Károlyi István Children Home in Fót. The Jesuit Refugee Service also put together a beginner Hungarian language book for foreign children. The book can be requested free of charge by Hungarian schools. They pointed out the need for such books as in their experience schools still do not have a set of curricula and tools that would allow for the gradual acquisition of the Hungarian language and local curriculum, and would also support the integration of non-Hungarian speaking children in school. In their experience, there are a few schools providing children from Ukraine with 5 hours of teaching per week for learning Hungarian, tutoring and learning support. In many schools, the level of expectation toward Ukrainian children is not differentiated from what is expected from native Hungarian-speaking

²⁸⁶ Information received from the Office of Education by the HHC on 27 January 2023.

²⁸⁷ Information received from the Office of Education by the HHC on 7 February 2024 and on 5 February 2025.

²⁸⁸ Section 51 (1) of the Asylum Decree

²⁸⁹ Section 51 (2) of the Asylum Decree

²⁹⁰ Information received from the NDGAP by the HHC on 2 April 2024.

²⁹¹ Information received from the Menedék Association by the HHC on 21 February 2024 and 21 February 2025.

pupils, and the repeated failure to succeed leads to further backlogs, lack of motivation and school stress.²⁹² The Evangelical Lutheran Diakonia shared the same concerns based on their 2024 experiences.²⁹³ Caritas Hungarica and the Hungarian Interchurch Aid also reported that they held Hungarian language courses for people from Ukraine.²⁹⁴

Practical challenges to accessing public education

Organisations assisting people fleeing Ukraine identified many practical challenges faced by children when trying to access public education in 2024.

First, kindergartens and schools often refused to receive children from Ukraine, despite their parents having submitted an application on time at the competent institution. The competent institution is where the child belongs based on their address. The HHC recorded a case in March 2023 in **Bag**, where children were unable to attend kindergarten while in August 2023 in Tatabánya, the school was unavailable for the children, as the institutions stated they did not have capacity to take them. In 2024, no such issue was recorded.

Once the children managed to get enrolled, a systemic problem in reception into schools has been the lack of assistance in integrating non-Hungarian speaking children. The most significant issue in that regard is that children who started attending Hungarian schools/kindergarten are generally not being provided with Hungarian language lessons. Therefore, it has become very much *ad hoc* how much children can integrate due to the obvious language barriers. UNHCR's multi-sectoral needs assessment also highlighted concerning 2023 that for the language barriers Ukrainian children often have to attend grades below their previous grade in Ukraine, affecting their motivation and learning path.²⁹⁵ As to 2024, UNHCR reports that young Ukrainians identify language barriers as one of the main challenges in school participation, often leading to school dropouts. Their parents, who do not speak Hungarian either, struggle to help them with homework or participate in school activities. While many Ukrainian-speaking children do attend Hungarian language classes, they still find it difficult to reach the proficiency needed to follow the Hungarian curriculum, prompting them to prefer online Ukrainian schooling.²⁹⁶

The Jesuit Refugee Service also noted in that regard that some Ukrainian parents simply prioritise Ukrainian online education over the Hungarian one, in the hope of their return to Ukraine soon. According to the Service the phenomenon of students learning exclusively through distance learning or a combination of distance and face-to-face learning continued in 2024. Related to the first case, although Hungary recognises the Ukrainian school system, certain subjects are not mutually recognised, leading some parents to opt for distance learning, especially for older children approaching graduation. Combined forms typically place an increased burden on pupils, especially mentally.²⁹⁷ The UNHCR reports that the preference for Ukrainian education through formal online schooling or local informal education are among the main reasons for non-enrolment in Hungarian schools. According to their data collected in 2024 one out of five school-aged refugee children were not enrolled in Hungarian schools (21%), 13% were enrolled in online Ukrainian learning only, while 8% were completely out of the education systems. 65% of UNHCR's respondents planned to pursue online Ukrainian education, either as an alternative to Hungarian education (52%) or in combination with Hungarian schooling (44%).²⁹⁸ By attending Ukrainian public education, children do not fulfil their obligation to take part in the Hungarian public education as

²⁹² Information received from the Jesuit Refugee Service by the HHC on 12 April 2024 and 27 February 2025.

²⁹³ Information received from the Evangelical Lutheran Diakonia by the HHC on 28 February 2025.

²⁹⁴ Information received from Caritas Hungarica on 10 February 2025 and the Hungarian Interchurch Aid on 7 February 2025 by the HHC.

²⁹⁵ UNHCR, *Hungary: Multi-Sectoral Needs Assessment, Final Report*, December 2023, available [here](#), p. 22.

²⁹⁶ UNHCR, *Hungary: Socio-Economic Insights Survey, Final Report*, October 2024, available [here](#), p 21.

²⁹⁷ Information received from the Jesuit Refugee Service by the HHC on 12 April 2024 and on 27 February 2025.

²⁹⁸ UNHCR, *Hungary: Socio-Economic Insights Survey, Final Report, October 2024*, available [here](#), pp 21-22.; Information received from the IOM by the HHC on 21 February 2024.

explained in the previous section. This obligation, however, is articulated by a *lex imperfecta*, accordingly, non-compliance with the law does not attract any sanction. Both Menedék Association and the Jesuit Refugee Service emphasised, concerning the school year 2023-2024, that one of the greatest challenges in the education system is affecting those children who are to leave elementary school and go to high-schools as high-schools normally require an entry exam, which is to be taken in Hungarian.²⁹⁹ These occurrences highlight that not only the children, but also the schools have been in need of assistance and centralised support in tackling these language barriers.

The need for organised summer break activities for children from Ukraine was also identified by the HHC during its monitoring mission to Gyöngyös in July. A lot of children spend their days without meaningful activities in the school breaks and without the care of adults, as those parents who are employed are mostly away at work and neither state nor (or just a few and not country-wide and in a systemic manner) civic organisations organise such activities or care for these children. Recognising this gap, the Jesuit Refugee Service organised five day-care sessions, two of which focused on English, one on theatre and drama, and two for the youngest children, with a story week and a pre-school session in the summer of 2024. In 2024, the age distribution was broader than in 2023, with 2024 welcoming not only secondary school children but also primary school children, in addition to the pre-school age group.³⁰⁰

The Hungarian Interchurch Aid reported that they organised state-funded child-supervision services.³⁰¹

Lastly, the education of bilingual/dual (Hungarian-Ukrainian) citizen children, who have no solid age-appropriate educational background has also been of great concern. While the language barrier is not an issue, the fact that these children - most typically Roma children from **Zakarpattia** - need catch-up and tutoring classes, which are not provided in most of the schools for evident capacity issues, has made their parents reluctant to apply to schools. This phenomenon was recorded by the HCC in **Uszka** (border area village) in March 2023, where parents also claimed they did not enrol their children to the local school for fearing discriminatory treatment. In the experience of the Evangelical Lutheran Diakonia, Ukrainian children too are typically enrolled in lower grades in Hungarian public schools, primarily for the language barriers.³⁰² Menedék Association shared this concern with regard to 2024: a particular difficulty for 8th-grade sheltered/refugee-applicant children is to continue their studies in secondary schools, as the central written test is in Hungarian and no translation is allowed. As a result, students perform well below their potential, which means that they can be admitted to lower secondary schools. Getting children over the upper age limit for compulsory education into secondary school is also of particular difficulty according to Menedék.³⁰³

Menedék Association put together a guide on the most essential information on the Hungarian education system for parents, available in Ukrainian, English and Hungarian.³⁰⁴ In 2023, they also produced a short film for parents on school enrolment, available with subtitles in Russian, Ukrainian, English.³⁰⁵ Staff member of the Association furthermore authored a study on the integration of foreign children into Hungarian education.³⁰⁶

²⁹⁹ Information received from the Menedék Association on 21 February 2025 and Jesuit Refugee Service on 27 February 2025 by the HHC.

³⁰⁰ Information received from the Jesuit Refugee Service by the HHC on 27 February April 2025.

³⁰¹ Information received from the Hungarian Interchurch Aid by the HHC on 7 February 2025.

³⁰² Information received from the Evangelical Lutheran Diakonia on 28 February 2025.³⁰³ Information received from the Menedék Association by the HHC on 21 February 2025.

³⁰³ Information received from the Menedék Association by the HHC on 21 February 2025.

³⁰⁴ Menedék Association: Going to Kindergarten and School in Hungary: a parent's guide to the Hungarian Education System, available, [here](#).

³⁰⁵ Positive stories – foreign children in Hungarian schools, available [here](#).

³⁰⁶ Éva Füredi: Külföldi gyerekek iskolai integrációja Magyarországon – szükségletek, lehetőségek és kihívások, Modern Nyelvoktatás, 2023/3-4, available in Hungarian [here](#).

Children with special needs

From a legal perspective, minor applicants and **beneficiaries** of temporary protection including those with special needs are entitled (and obliged) to take part in public education, also in specialised pedagogical services, as explained above. The Act on Public education foresees special rules concerning the education and training of children with special educational needs and integration, learning and behavioural difficulties.

A child with special educational needs is defined as a child who, according to an expert opinion of the competent body under the Act on Public Education, has a motor, sensory (visual, auditory), mental or speech disability, multiple disabilities, an autism spectrum disorder or other mental development disorder, including severe learning, attention or behavioural disability.³⁰⁷ These children shall have the right to receive pedagogical, remedial or conductive educational care appropriate to their condition. The care appropriate to the special educational needs must be provided in accordance with the expert opinion. The parent may choose the educational establishment providing appropriate care for children with special educational needs on the basis of the expert opinion of the competent expert committee, taking into account the needs and capacities of the parent and the child. The education of these children is to be carried out in institutions established for the specific purpose of educating children with special needs. If children have difficulties in integration, learning or behaviour, they are entitled to developmental pedagogical care.³⁰⁸

At the time of writing, the HHC is not aware of specific information regarding the practical challenges met by children with special needs in accessing education, although they are likely to at the very least face the challenges described above met by other children. IOM, however, noted that children with special education needs face obstacles for obtaining expert's opinion and official diagnoses needed for their enrolment in special needs education.³⁰⁹ In the experience of the Evangelical Lutheran Diakonia, schools are generally reluctant to receive Ukrainian children with special needs, with reference to capacity issues and language barriers.³¹⁰ The Jesuit Refugee Service pointed out with regard to 2024 that in their experience institutions only have limited answers to very specific needs - this concerns autistic or mentally handicapped school-age children, whose placement is not only a problem for the Hungarian system, and the lack of Hungarian language skills is an additional complicating factor. The needs assessment conducted by the Jesuit Refugee Service also highlighted that children with disabilities face 3 additional challenges. The slowness of the diagnostic process - and sometimes high fees - limits timely access to special education and health resources, and the lack of recognition of disability further complicates access to support. Parents reported a lack of resources for children with special education and educational needs, such as personalised materials and services, both in schools and other institutions.³¹¹

Moreover, as explained in [Guarantees for vulnerable persons](#), there are no specific identification mechanisms in place in Hungary to identify vulnerable individuals and there has been no comprehensive screening for people with special protection needs within the temporary protection scheme. This is unfortunately also true with regard to children with special needs.

Higher education

Beneficiaries of temporary protection may be admitted into higher education under the same conditions as Hungarian citizens and they are eligible for state-subsidised education in line with Act CCIV of 2011

³⁰⁷ Section 4 point 25. of Act CXC of 2011 on Public Education.

³⁰⁸ Section 47 of Act CXC of 2011 on Public Education.

³⁰⁹ Information received from the IOM by the HHC on 21 February 2024.

³¹⁰ Information received from the Evangelical Lutheran Diakonia by the HHC on 24 February 2024.

³¹¹ Information received from the Jesuit Refugee Service by the HHC on 27 February 2025.

on Higher Education.³¹² In practice, however, there are gaps in enforcing the rights of the refugee population in higher education (see [General Report – Access to education](#)).

It is worth noting that in the context of the Ukrainian crisis, in 2022 it was not the temporary protection-eligible population, but primarily the third-country nationals with short-term student visas issued by Ukraine who sought assistance regarding access to the Hungarian higher education system in the experience of the HHC.

Although no official data is available as to how many students from Ukraine are enrolled in Hungarian higher education and into which institutions, according to Hungarian media outlets and university communications, numerous Hungarian universities opened their doors not only to temporary protection-eligible students, but to all students fleeing Ukraine in 2022. The University of Pécs, among the first, opened a registration platform for those who had to interrupt their studies in Ukraine due to the ongoing war and offered over 100 study programmes in English and Hungarian covering all major academic fields, also in 2024. Guest students from Ukraine were also [exempted](#) from paying the tuition fees and dormitory fees for the spring semester. [Simmelweis University](#) also announced in March 2022 that it was accepting foreign medical students. The [Eötvös Loránd University](#), the [Moholy-Nagy University of Art and Design](#), the University of Pannonia, the [Corvinus University of Budapest](#) and the [Hungarian University of Agriculture and Life Science](#) also opened their courses to refugees from Ukraine in 2022.

Students and teachers who would like to stay in Hungary can also apply to the Tempus Public Foundation. The [Students at Risk Programme](#) was launched in 2022 by Tempus Public Foundation in the frame of the Stipendium Hungaricum Scholarship Programme supervised by the Ministry of Foreign Affairs and Trade, with the aim to provide higher education scholarships supporting the students in continuing their studies that they started in Ukraine and earning a bachelor's, master's or doctoral degree in Hungary.³¹³ Menedék Association noted that this is a highly useful programme for those who fled Ukraine, however, according to their knowledge, only a very few people were granted participation.³¹⁴ UNHCR reported in 2024 that the participants of their survey who were already in university expressed concerns regarding the costs of education, and in particular, the fact that scholarships are deemed insufficient to cover even the most basic costs, such as accommodation.³¹⁵ The Stipendium programme was ongoing in 2023 and 2024 too. Applicants with Ukrainian citizenship can choose any study field and study programme offered in the Stipendium Hungaricum Scholarship Programme. Applicants with third-country citizenship can select study programmes offered in the Stipendium Hungaricum Programme in the field of Economic Science, Engineering Science, Computer Science and Information Technology, Natural Science, Agricultural Science and Medical and Health Science and they are eligible to apply for the Conductive Education study programme as well. Similarly, the applicants can apply to study at those Hungarian higher education institutions that are involved in the Stipendium Hungaricum Programme. Moreover, Széchenyi Funds and Óbuda University supported students from Ukraine with scholarships in 2022.³¹⁶ The listing of universities and scholarship is not exhaustive herein, this exemplificative description solely aims at pointing out the unparalleled solidarity of the actors of higher education towards the student population fleeing Ukraine.

The Evangelical Lutheran Diakonia noted that there were not enough organisations assisting young Ukrainians to access higher education, whose access to higher education was generally poor in 2023.³¹⁷

³¹² Article 39 (1)b.) of Act CCIV of 2011 on Higher Education.

³¹³ Programme description available [here](#).

³¹⁴ Information received from the Menedék Association by the HHC on 21 February 2024.

³¹⁵ UNHCR, *Hungary: Socio-Economic Insights Survey, Final Report*, October 2024, available [here](#), p 22.

³¹⁶ The university's official communication is available [here](#).

³¹⁷ Information received from the Evangelical Lutheran Diakonia by the HHC on 24 February 2024.

F. Social welfare

The law does not provide access to social welfare for beneficiaries of temporary protection. The Act III of 1993 on Social Administration and Social Benefits and the Act XXXI of 1997 on child protection and child care administration regulating child welfare services do not apply to temporary protection beneficiaries and applicants, thus, they are not entitled to the social services. The care of the temporary protection-eligible population is carried out entirely within the system of asylum administration.

Maternity allowance is the only available benefit outside the scope of asylum administration, which may be accessed by any woman legally resident in Hungary at the time of applying for maternity allowance and who attended antenatal care in Hungary at least four times during their pregnancy, or at least once in the case of premature birth, in line with the provisions of Act LXXXIV of 1998 on aiding families.³¹⁸ This support may be requested after the child is born. If the child is a foreign national, then the request is to be submitted at the competent Government Office.³¹⁹

As temporary protection beneficiaries are generally not entitled to access the benefits of the social welfare system, only maternity allowance could be requested in 2022. The HHC and assistance partners do not have particular experience in this regard in terms of obstacles faced, contrary to those met when receiving the [subsistence allowance](#). The UNHCR also highlights that in Hungary relevant legislation fails to include temporary protection beneficiaries in a wide range of social protection benefits, including family allowances for households with a disabled child.³²⁰

A positive development is to be noted. Namely, since 1 January 2024, the scope of available social benefits has been broadened and child care and infant care allowance is available for those Ukrainian parents, who work in Hungary and whose child was born after 31 December 2023, even if their official residence is registered in Ukraine. This has been a result of a legislative amendment of a government decree, which previously required beneficiaries of these allowances to have an official Hungarian residence, which, naturally, most people who fled Ukraine did not have. The legislative change, however, states that a place of accommodation in Hungary shall be regarded as official residence, thereby making Ukrainian workers eligible to the benefits.³²¹ This development may be attributed to the advocacy efforts of Menedék Association.³²²

The Evangelical Lutheran Diakonia furthermore highlighted that the situation of pensioners is not resolved. In their experience, in order to apply for a Hungarian pension, the waiver of the Ukrainian pension had to be proved first and no employment was allowed while the case was pending. Decision in such a case could take up to 15 months in the charity's experience, and problematically, during this period, the person concerned - usually elderly or sick - has no income or social security.³²³

No data available as to the number of beneficiaries of temporary protection who accessed different forms of social welfare as of 31 December 2024.

³¹⁸ Section 29 (4) of Act LXXXIV of 1998 on aiding families.

³¹⁹ Section 35 of Act LXXXIV of 1998 on aiding families.

³²⁰ UNHCR, *The situation of vulnerable refugees from Ukraine*, 13 January 2025, p 3, available [here](#).

³²¹ Gov. Decree 623/2023 (XII.23) amending Gov. Decree 246/2022 (VII.8)

³²² Information received from the Menedék Association by the HHC on 21 February 2024.

³²³ Information received from the Evangelical Lutheran Diakonia by the HHC on 24 February 2024.

G. Health care

Access to health care is provided both to temporary protection beneficiaries and applicants. The scope of services to which they are entitled is specifically defined in the Asylum³²⁴ and TP³²⁵ Decrees. These services are:

- A. examinations and treatment under the scope of general medical care (in practice these means the treatment generally provided by the district GP),³²⁶
- B. examination and treatment in emergency outpatient care, and medicines and dressings used in the course of such care;
- C. in-patient care in case of urgent need, and medical treatment prescribed by a doctor, including surgical operations and the medical materials and prostheses used, medical care, medicines, dressings and meals;
- D. following specialised out-patient care or in-patient hospital treatment, until recovery from the illness or until stabilisation of the condition:
 - a. the necessary examination and treatment,
 - b. medicinal products other than those referred to in point (h) which cannot be substituted for another medicinal product and medical devices necessary for the administration of the medicinal product;
- E. medical appliances other than those referred to in point (D)(D(b)) ordered by a doctor, and their repair;
- F. emergency dental care and treatment for the preservation of teeth, provided that the treatment is of the lowest reimbursement category;
- G. prenatal care and obstetric care or, under the conditions laid down in the Act on the Protection of Foetal Life, for an operation to terminate a pregnancy;
- H. medicines and dressings prescribed free of charge for "persons entitled to public health care" under a special law or with a 90% or 100% social security subsidy under a "health care provision";
- I. in the case of benefits under points (B) and (C), (D)(D(a)) and (G), transport of a patient if, because of their state of health, transport cannot be provided otherwise;
- J. compulsory vaccination linked to age,
- K. examination and treatment in oncological care and other chronic care, and medicinal products used by persons entitled to social security benefits for the purpose of improving, maintaining or relieving pain in the context of specialised oncological care and other chronic care and general health care with price support.

Barriers to accessing health care

UNHCR states that 22% of those who fled to Hungary from Ukraine with health needs reported being unable to access medical care in Hungary. The primary obstacles are language barriers (53%), long waiting times (40%), difficulties making appointments (31%), and the inability to afford clinical fees (23%). Additionally, around one out of five refugees experienced refusal of care by medical staff or were unsure where to seek assistance.³²⁷

Temporary protection applicants and beneficiaries' access to health care services is frequently hindered by administrative challenges faced by health care providers in practice. In the experience of the HHC,

³²⁴ Sections 26-28 and 44(2) of Asylum Decree.

³²⁵ Section 6(2) of TP Decree.

³²⁶ As provided in Act CXXIII of 2015 on general medical care.

³²⁷ UNHCR, *Hungary: Socio-Economic Insights Survey, Final Report*, October 2024, available [here](#), p. 30

Menedék Association³²⁸ and the Evangelic Lutheran Diakonia³²⁹ and Maltese Charity Service³³⁰ health care providers frequently do not know what health-care benefits are TP beneficiaries entitled to: they do not know how to register patients without a social security number, which is provided to those with a registered address and address card, having social security status. Without registration, the cost of healthcare services is not covered. Getting discounted prescriptions in pharmacies is sometimes also a problem for TP beneficiaries.³³¹

Temporary protection applicants and beneficiaries (and dual - Ukrainian-Hungarian citizens) however, do not have an address card or social security card, as they are normally accommodated in a temporary manner, and as long as they lack employment, they cannot obtain social security status either. Therefore, if they turn to a health care provider, they are frequently sent away, for the health care providers fears that the expenses will not be reimbursed by the state. This was a significant and duly documented issue both in 2022, 2023 and 2024. The HHC recorded such cases in Pest, Heves Komárom-Esztergom and Szabolcs-Szatmár counties. It was documented multiple times by the HHC that people from Ukraine complained that they were refused to be provided with health-care services at the local hospital in Érd on the account of their Ukrainian nationality or Roma ethnicity. The Evangelical Lutheran Diakonia also reported discriminatory treatment concerning temporary protection beneficiaries in the public health sector. The charity noted that specifically in the hospital of Hatvan, Ukrainian families were refused to be treated or were charged for gynaecological services. Diakonia reported that in 2023 in Érd, the local GP was also charging a fee of 10.000 HUF for his services and temporary protection beneficiaries were also charged for vaccines. The charity registered a case where the public dentist also wanted to charge temporary protection beneficiaries. Furthermore, people from Ukraine are not offered influenza and COVID vaccines.³³²

As waiting lists are already long in Hungary, many people choose private healthcare or go home - mainly women and children - to Ukraine for treatment.³³³

As indicated under the previous point, applicants and beneficiaries of temporary protection in need are to be provided with a broad set of health care services. In order to manage their registration by health care providers, Government Decree 171/2022 (IV.29) introduced some executive regulations, instructing health care providers on how to register temporary protection applicants, beneficiaries and Hungarian-Ukrainian citizens who fled the war. The Decree provides that health care providers are to use a special, technical identification number instead of the social security number. It furthermore provides that the number of the TP card and humanitarian residence card, and the number of personal ID documents are to be registered.³³⁴ The cost of health care service is then to be reimbursed by the asylum authority.³³⁵ These legal provisions are, as pointed out above too, unknown by some of the health-care providers. Therefore, the intervention and assistance of lawyers and social workers of NGOs assisting the refugee population, who could explain the procedure to be followed to the health care providers have been frequently needed.

In the experience of IOM, the main challenges concerning healthcare in 2022 were related to lack of As for 2023, the IOM reported the following obstacles beneficiaries of temporary protection had to face while trying to access public healthcare:³³⁶

³²⁸ Information received from Menedék Association by the HHC on 28 February 2023, 21 February 2024 and 21 February 2025.

³²⁹ Information received from the Evangelic Lutheran Diakonia by the HHC on 24 February 2024 and on 28 February 2025.

³³⁰ Information received from the Maltese Charity Service by the HHC on 10 February 2025.

³³¹ Information received from the Hungarian Interchurch Aid by the HHC on 7 February 2025.

³³² Information received from the Evangelic Lutheran Diakonia by the HHC on 24 February 2024.

³³³ Information received from the Evangelic Lutheran Diakonia on 28 February 2025.

³³⁴ Section 2 of Government Decree 171/2022 (IV.29).

³³⁵ Ministry of Human Resources, *Information to support families from Ukraine for family and child welfare service providers*, May 2022, available [here](#), 13.

³³⁶ Information received from the IOM by the HHC on 21 February 2024.

- ❖ Lack of knowledge among healthcare professionals about relevant legislation, entitlements provided by the temporary protection (TP) card and validity of documentation which may result in denial of services. DTM data: 36% of respondents with TP or other protection schemes reported the lack of relevant documents as an impediment to accessing healthcare services. In addition, 50 per cent of them mentioned the high cost of services;
- ❖ Misinterpretation of procedures and lack of usage of the ‘Technical Identifier’ allowing TPs to easier access of services, constraining the comprehensive patient data management through EESZT;
- ❖ Lack of awareness among pharmacies related to social insurance benefits of TPs and applicable benefit rates;
- ❖ Language barriers constraining verbal interaction and acceptance of medical documentation from Ukraine. According to DTM findings, 96% of respondents with TP or other national protection schemes identified language barrier as an obstacle when accessing healthcare services;
- ❖ Refusal to accept remote interpretation modalities;
- ❖ General capacity issues across the sector. According to DTM data, 36% of respondents with TP or other national protection schemes cited long queues, while 18% mentioned the unavailability of services as a barrier;
- ❖ Additional obstacles for refugees with disabilities, chronic conditions and with limited mobility have been reported, especially with the acceptance of Ukrainian medical documentation and the recognition of their respective conditions. This can result in delayed treatments and ineligibility to other services;
- ❖ Refugees often are not aware of available mobility support services. DTM data: 7% of respondents referred to the lack of adequate transport options to available healthcare facilities.

The Jesuit Refugee Service also reported that the need of accurate interpretation for the language barriers was a significant issue in 2023 and 2024 in the health care provision concerning those who fled Ukraine.³³⁷ The Maltese Charity Service confirmed this finding for 2024.³³⁸

According to Caritas Hungarica, access to emergency care for families has not been hindered. In some cases, however, there are significant barriers to accessing specialist care, because the beneficiaries are not being employed or insured. The exceptions to this are access to specialist care and hospital care in cases of urgent need, and sheltered persons requiring special treatment (e.g., unaccompanied minors, elderly, disabled, pregnant women). Caritas Hungarica provided health screenings on a monthly basis during the first half of last year with the help of our Medical Mission Programme team and medical volunteers, aiming to ensure access to appropriate services. In addition to providing screenings, the charity helps families access appropriate additional tests. This is provided on an ongoing basis. Their Integration Centre staff (Ukrainian-Hungarian speaking) also personally accompanies families to overcome language barriers and to ensure smoothness. Their medical mission services have provided the following screening tests: ophthalmology (with the provision of glasses if needed), blood sugar, blood pressure, ECG, gynaecological cancer screening, as well as orthopaedics and dentistry.³³⁹

Menedék Association put together a policy-specific recommendation based on their experience concerning the health-care provision of people fleeing Ukraine.³⁴⁰

Further, a very typical 2023 concern which came up in numerous locations accommodating beneficiaries of temporary protection was that the expiry date on the TP card caused confusion as many health-care

³³⁷ Information received from the Jesuit Refugee Service by the HHC on 12 April 2024 and 27 February 2025.

³³⁸ Information received from the Maltese Charity Service by the HHC on 10 February 2025.

³³⁹ Information received from Caritas Hungarica by the HHC on 10 February 2025.

³⁴⁰ Menedék Association: Recommendations in the area of health care provision of people fleeing Ukraine, available in Hungarian [here](#).

providers were not aware of the automatic extension of TP cards (without new documents being issued) and the obligation to regard the cards valid, regardless of the date stated on the document.³⁴¹ Beneficiaries had therefore difficulties with accessing medical care on account of the expired validity date on the temporary protection card. In 2024, this issue was not reported.

Lastly, the disproportionate financial burden that is placed on Ukrainian beneficiaries in accessing healthcare is to be highlighted as per UNHCR's 2024 finding: the average monthly healthcare cost for Ukrainian families is 21,000 HUF, which nearly equates the subsistence allowance given by the Hungarian government to cover their basic living expenses. However, families with members who have disabilities or chronic illnesses, or those with older members, face much higher healthcare costs. Families with disabled members need an average of 29,000 HUF per month — 34% more than the average household. Similarly, households with chronically-ill people see a 15% increase in their healthcare spending.³⁴² Regarding access to mental health support, see [Guarantees for vulnerable groups](#).

³⁴¹ Recorded in Szentés and Beregsurány in March 2023, in Szigetszentmiklós in May 2023, in Sulyánbukor in June 2023, in Nyíregyháza in July 2023.

³⁴² UNHCR, *Hungary: Socio-Economic Insights Survey, Final Report*, October 2024, p 31, available [here](#).