

Temporary Protection Slovenia

2024 Update

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

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Temporary Protection Procedure

A. General

On 4 March 2022, the Council of the European Union adopted the Council Implementing Decision (EU) 2022/382¹ (hereinafter: Council Decision) to activate the Council Directive 2001/55/EC (hereinafter: Temporary Protection Directive or TPD),² providing immediate and temporary protection to persons displaced from Ukraine on or after 24 February 2022 due to the military invasion of the Russian armed forces. On 9 March 2022, the Government of the Republic of Slovenia adopted the Decision establishing temporary protection for persons displaced from Ukraine (hereinafter: Government Decision),³ which entered into force on 10 March 2022. The Government decision allowed for the activation of the Temporary Protection of Displaced Persons Act (ZZZRO),⁴ which was adopted in 2005 to transpose the TPD. The Act regulates the introduction, duration and termination of the temporary protection of displaced persons (hereinafter: temporary protection or TP), the conditions and procedures for obtaining temporary protection and the termination thereof, and the rights and obligations of persons enjoying temporary protection. In accordance with the Government Decision, temporary protection was introduced from the date of entry into force of the decision and for a period of one year,⁵ with the possibility of extension for a maximum of two times for a period of six months each.⁶ At the time of writing this report, no changes have yet been made to the Slovenian legislation regulating temporary protection, apart from amending the Decision establishing temporary protection for displaced persons from Ukraine to extend temporary protection in the Republic of Slovenia until 4 March 2025,⁷ in accordance with the Council Implementing Decision (EU) 2023/2409 of 19 October 2023 extending temporary protection.⁸

Once the temporary protection's period of validity expires, the provisions of the Foreigners Act apply and regulate the modalities of the person's departure from the Republic of Slovenia.⁹

¹ 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, OJ L 71/1, available [here](#).

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 at <http://bit.ly/409uJhu>.

³ Decision establishing temporary protection for persons displaced from Ukraine, Official Gazette of RS, No. 32/22.

⁴ Temporary Protection of Displaced Persons Act, Official Gazette of RS, No. 16/17.

⁵ Article 11 of the ZZZRO vaguely stipulates that the duration of temporary protection shall be one year and may be extended no more than twice, each time for a period of six months. Further, duration of temporary protection was determined in the Government Decision, which states it is introduced for one year from the date of entry into force of the decision, which could be misinterpreted as lasting until 10 March 2023, considering the date when the Decision entered into force. It is expected that greater clarity in this regard will be ensured *de lege ferenda* (as already included in some proposed amendments to the Act) with a reference to the enforcement of the Council Decision and by clarifying that the duration of temporary protection is tied to the enforcement of the Council Decision and not to the enforcement of the Government Decision from Article 10 of the ZZZRO in line with the Commission Communication on operational guidelines for the implementation of Council Implementing Decision (EU) 2022/382 of 4 March 2022 (Official Journal of the EU, No. C 126 I/01). In any case, individual decisions on granting temporary protection, issued by administrative units since 10 March 2022, have been granting temporary protection in accordance with the duration of TP in line with Council Decision.

⁶ Article 2 Government Decision.

⁷ Decision amending the Decision establishing temporary protection for displaced persons from Ukraine, Official Gazette of RS, No.4/24.

⁸ Council Implementing Decision (EU) 2023/2409 of 19 October 2023 extending temporary protection as introduced by Implementing Decision (EU) 2022/382, OJ L 2023/2409, available [here](#).

⁹ Foreigners Act, Official Gazette of RS, No. 91/21 and subsequent amendments.

Main legislative acts on temporary protection

Title (EN)	Original Title (HU)	Abbreviation	Web Link
Temporary Protection of Displaced Persons Act, Official Gazette of RS, no. 22/25	Zakon o začasni zaščiti razseljenih oseb, Uradni list RS, št. 22/25	ZZZRO-1	https://bit.ly/4jd93df (SI)
Temporary Protection of Displaced Persons Act, Official Gazette of RS, no. 16/17	Zakon o začasni zaščiti razseljenih oseb, Uradni list RS, št. 16/17	ZZZRO	https://bit.ly/3ac7w8T (SI)

Main implementing decrees, guidelines and regulations on temporary protection

Title (EN)	Original Title (HU)	Abbreviation	Web Link
Decision establishing temporary protection for persons displaced from Ukraine, Official Gazette of RS, No. 32/22, 4/24 and 74/24	Sklep o uvedbi začasne zaščite za razseljene osebe iz Ukrajine, Uradni list RS, št. 32/22, 4/24 in 74/24	Government Decision	http://bit.ly/3jDcuQQ (SI)
Decree on the methods for ensuring rights of persons enjoying temporary protection, Official Gazette of RS, No. 42/22, 151/22, 109/23 and 74/24	Uredba o načinu zagotavljanja pravic osebam z začasno zaščito, Uradni list RS, št. 42/22, 151/22, 109/23 in 74/24		https://bit.ly/3Mt2UcH (SI)
Rules on the application for granting temporary protection and on the identity card of persons enjoying temporary protection, Official Gazette of RS, No. 43/22	Pravilnik o vlogi za začasno zaščito in izkaznici osebe z začasno zaščito, Uradni list RS, št. 43/22		http://bit.ly/3jxNMRR (SI)
Decision determining the allowance for private accommodation, Official Gazette of RS, No. 41/14	Sklep o določitvi denarnega nadomestila za zasebno nastanitev, Uradni list RS, št. 41/14		http://bit.ly/3GpCDeU (SI)
Rules on the procedure concerning transferal of persons enjoying temporary protection, Official Gazette of RS, No. 110/05	Pravilnik o postopku premestitve oseb z začasno zaščito, Uradni list RS, št. 110/05		http://bit.ly/3WPiOCO (SI)
Instructions on the procedure and method of dealing with persons illegally entering the Republic of Slovenia during the period when covered by temporary protection, Official Gazette of RS, No 34/06 and 58/22.	Navodilo o postopku in načinu ravnanja z osebami, ki v času trajanja začasne zaščite nezakonito vstopijo v Republiko Slovenijo, Uradni list RS, št. 34/06 in 58/22		http://bit.ly/3vmlLOy (SI)

Article 10 of the ZZZRO, which regulates the introduction of temporary protection in Slovenia, provides that when the Council of the EU determines that a situation threatening people, such as war, has arisen in a third country or region, the Government shall adopt a resolution introducing temporary protection specifying in particular the number of persons to be granted temporary protection by the Republic of Slovenia, the conditions in which this quota of persons may be exceeded, particularly when it comes to exercising the right to family reunification or when vulnerable groups of people are involved, the date of the introduction and duration of temporary protection and the time limit by which persons enjoying temporary protection shall be required to leave the Republic of Slovenia after temporary protection has

come to an end. The Government shall also inform the Council of the EU of the accommodation capacities of the Republic of Slovenia available for the reception of displaced persons.

The Government Decision introducing temporary protection in the Republic of Slovenia sets the categories of persons to whom the temporary protection is granted, the duration of temporary protection and the rules applicable to the persons concerned after termination of temporary protection. However, the Decision lacks an essential provision in accordance with the aforementioned Article 10 of the ZZZRO: *i.e.*, the number of people to whom Slovenia will offer temporary protection. On 10 March 2022, the Government explained that such number was not included because it was impossible to estimate the number of persons to whom the Republic of Slovenia would provide temporary protection and to assess the reception facilities at the time of adopting the Decision.¹⁰ The Government also noted that the vast majority of displaced persons from Ukraine was, at that time, housed at private addresses, which was expected to change in the following days, causing reception capacities to be increased accordingly. Further explanation was that the exact number of persons is also not specified in the implementing decision of the Council of the EU, even though the directive requires, under the third paragraph of Article 5, that the decision also include, *inter alia*, data received from the Member States on their reception capacities. According to the Minister of the Interior at the time, Slovenia could provide a temporary home to approximately 180,000 to 200,000 refugees from Ukraine altogether at the time of the said statement.¹¹ Even with the extension of TP until 4 March 2026, no further information on the estimated number of persons to whom the Republic of Slovenia would provide temporary protection was announced by the government and there has been no update in this regard yet in the first quarter of 2025.

Further, on 24 March 2022, the Decree on the methods for ensuring the rights of persons enjoying temporary protection was adopted and entered into force on 25 March 2022.¹² It specifies how to ensure the rights of persons with temporary protection and applicants for temporary protection in more detail.

The ZZZRO, that is still applicable in March 2025, was adopted in 2005 and has so far been amended only once, in 2017, to regulate the separation of powers between the Government Office for the Support and Integration of Migrants (hereinafter: UOIM) and the Ministry of the Interior (hereinafter: Ministry). Since its first activation in 2022, several issues regarding TP have arisen in practice, demonstrating the need for legislative amendments in this regard, as further addressed in this report. One of the main issues with the Act is that it is outdated and deficient in some pressing areas, particularly with respect to providing a clearer regulation of the relationship between temporary protection and international protection and the transition between the statuses as well as transition to any other legal ground for residing in Slovenia after the cessation of temporary protection by obtaining a residence permit for other purposes (such as for the purpose of employment, self-employment, studies etc.). Considering that, over time, there have been certain legal developments of international protection, while no such significant amendments were made in relation to temporary protection, it is also necessary to modernise the system of temporary protection and to bring it closer to the system of international protection *mutatis mutandis*, considering that the two institutes are essentially comparable in rationale. The ZZZRO also inadequately transposed the Temporary Protection Directive. For these reasons, as also explained in the proposed laws, there were several attempts to amend the Act with the following proposed legislation:

- ❖ the Act on Intervention Measures for Comprehensive Regulation of the Situation of Displaced Persons from Ukraine and for Assistance to the Economy of the Republic of Slovenia Due to the Consequences of the Ukrainian Crisis,¹³ proposed by the Government in May 2022, which was not adopted,
- ❖ the Act on Intervention Measures for Comprehensive Regulation of the Situation of Displaced Persons from Ukraine and for Assistance to the Economy of the Republic of Slovenia Due to the

¹⁰ 24ur.com, *Število oseb, ki jim bo Slovenija nudila začasno zaščito, trenutno ni omejeno*, 10 March 2022, available in Slovenian [here](#).

¹¹ MMC RTV Slovenija, *Hojš: Slovenija je pripravljena sprejeti do 200.000 beguncev iz Ukrajine*, 27 February 2022, available in Slovenian [here](#).

¹² Decree on the methods for ensuring rights of persons enjoying temporary protection, Official Gazette of RS, No. 42/22 and 151/22.

¹³ The proposed law is available in Slovenian [here](#).

Consequences of the Ukrainian Crisis,¹⁴ proposed by a group of members of the National Assembly (Parliament) in September 2022, which was not adopted,

- ❖ a new Temporary Protection of Displaced Persons Act (ZZZRO-1),¹⁵ proposed by the Ministry of the Interior, which was finally adopted on 25 March 2025, with most provisions coming into effect 3 months after its entry into force, i.e. from 20 July 2025.

As can be seen from the chronologically listed proposed legislative changes, the identified deficiencies were first intended to be addressed with an intervention law, which would intervene in some problematic areas of the current legal regulation of temporary protection. However, as changes are needed in more than half of the articles of the current Act on Temporary Protection of Displaced Persons, it became apparent that regulation through sectoral law would be more appropriate in order to eliminate the shortcomings in a comprehensive and thorough manner, as explained in the reasoning behind the new Act on Temporary Protection of Displaced Persons (ZZZRO-1).

Statistics

According to official statistics provided by the General Police Directorate, in 2024, a total of 1,788 applications for temporary protection were submitted to the Police in comparison with the 1,568 applications submitted in 2023. 1,772 were lodged by Ukrainian citizens, 4 by Russian citizens, and the rest were of other nationalities (e.g., citizens of Belarus, Moldova). One of the applicants was a stateless person. In addition to those granted temporary protection, there were also individuals who may have been displaced – directly or indirectly – by the ongoing conflict but who fall outside the scope of the Temporary Protection Directive. For example, since the declaration of partial mobilisation by the Russian president on 21 September 2022, a certain number of Russian citizens have sought protection in the Republic of Slovenia According to the findings of the General Police Directorate.¹⁶ In 2024, 48 Russian citizens applied for international protection, compared to 118 in 2023.¹⁷ However, it should be noted that the competent authorities do not collect data in a manner that would indicate the specific reasons for seeking protection. As such, it is not possible to definitively determine whether these applications are linked to displacement caused by the conflict. Nevertheless, according to the author of this report, given the context, it can be reasonably assumed that at least some of these individuals were affected – either directly or indirectly – by the war.

However, not all applicants apply for temporary protection at the Police, as they may also apply directly at the territorially competent administrative units, which is the authority deciding on granting temporary protection. According to the statistics of the Ministry of the Interior provided to PIC, a total of 1,899 persons applied for temporary protection in the Republic of Slovenia in 2024. 1,864 were Ukrainian citizens, 7 were Russian citizens and others were of other nationalities. In 2024, temporary protection was granted to 1,810 persons, of which 1,790 were Ukrainian citizens. Additionally, 19 applications for temporary protection were dismissed, 10 were rejected and 76 procedures were stopped.¹⁸ In the same period Ukraine citizens also submitted 123 applications for international protection.¹⁹

B. Qualification for temporary protection

The general definition of the specific groups of displaced persons to whom temporary protection applies in the national context is foreseen in Article 3 of the ZZZRO, which refers to third-country nationals or stateless persons who have had to leave their country or region of origin or have been evacuated, in particular in response to an appeal by international organisations, and are unable to undertake a safe and durable return due to the situation prevailing in that country or region, who may fall within the scope of

¹⁴ The proposed law is available in Slovenian [here](#).

¹⁵ ZZZRO-1, Official Gazette of RS, no. 22/25.

¹⁶ Official statistics provided by the General Police Directorate, February 2023 and February 2024.

¹⁷ Government of the Republic of Slovenia, *Priseljevanje v Slovenijo*, available in Slovenian [here](#).

¹⁸ Official statistics provided by the Ministry of the Interior, April 2025.

¹⁹ Government of the Republic of Slovenia, *Priseljevanje v Slovenijo*, available in Slovenian [here](#).

the Convention Relating to the Status of Refugees or other regulations giving international protection, in particular:

- ❖ persons who have fled areas of armed conflict or endemic violence;
- ❖ persons at serious risk of, or who have been the victims of, systematic or generalised violations of their human rights.

As per the Government Decision introducing temporary protection in the Republic of Slovenia for persons displaced from Ukraine on or after 24 February 2022 due to the military invasion by the Russian Armed Forces,²⁰ the following categories of persons residing in Ukraine before 24 February 2022 are eligible for temporary protection²¹:

- ❖ citizens of Ukraine,
- ❖ stateless persons and third-country nationals who are not citizens of Ukraine and who were granted international protection or other equivalent national protection in Ukraine,
- ❖ family members of the persons referred to in the first and second indents of this paragraph, as defined in Article 36 of the ZZZRO, *i.e.*:
 - a spouse or a person who had lived with the person who was granted temporary protection before their arrival in the Republic of Slovenia, for at least one year, in a domestic community that is equal in legal consequences to a marriage pursuant to the Family Code;²²
 - the children of the person granted temporary protection, as long as the person is obliged to support them;²³
 - stepchildren if they support their stepfather or stepmother, and a stepmother or stepfather if they support their stepchildren;²⁴
 - grandchildren and nephews of the person granted temporary protection, in so far as that person is supporting the grandchildren or nephews who are without parents;
 - other close relatives of the person granted temporary protection, if they had lived together as a family before their arrival in the Republic of Slovenia and were supported by the person who has obtained temporary protection,
- ❖ stateless persons and third-country nationals who are not citizens of Ukraine and who resided in Ukraine on the basis of a valid permanent residence permit and who are unable to return to their country or region of origin in a safe and sustainable or lasting manner.

The Council Decision allows Member States to extend temporary protection to additional categories of displaced persons beyond those to whom the Decision applies,²⁵ including those persons who fled Ukraine not long before 24 February 2022 as tensions increased or who found themselves in the territory of the EU just before that date and who, as a result of the armed conflict, cannot return to Ukraine. Despite this possibility, in the Republic of Slovenia only persons fulfilling the condition of leaving Ukraine on or after 24 February 2022 are considered eligible for temporary protection. Persons that are not eligible for temporary protection can however apply for international protection.²⁶

In practice PIC observed that the definition of persons to whom temporary protection applies in accordance with the Government Decision has been interpreted very narrowly by the competent authorities in Slovenia. Therefore, individuals who otherwise fall into one of the listed categories but were not physically located on the territory of Ukraine at the time of the outbreak of the war on 24 February 2022, despite residing in Ukraine before the date, are not entitled to temporary protection. Strictly conditioning eligibility for temporary protection on the date a person left Ukraine has shown to be

²⁰ Article 1(1) Government Decision.

²¹ Article 1(2) Government Decision.

²² Family Code, Official Gazette of the Republic of Slovenia, no. 15/17 and subsequent amendments.

²³ The notion of 'obligation to support' in family relations is regulated in the Family Code, which stipulates that parents are obliged to support their minor children, *i.e.*, until they reach the age of 18, or until the age of 26, as long as they are enrolled into school as regular students.

²⁴ *Ibid.*

²⁵ Where those persons are displaced for the same reasons and from the same country or region of origin as referred to in the Decision.

²⁶ Information provided by the Ministry of the Interior, February 2024.

problematic, despite such persons being able to apply for international protection as an alternative.²⁷ Namely, per PIC's staff direct practical experience, multiple Ukrainians that were not eligible for temporary protection had certain reservations regarding applying for international protection, mainly due to not being able to visit Ukraine to maintain properties, visit family members and to assess the current situation, while under international protection, as in accordance with the International Protection Act,²⁸ a person's voluntary return to the home country is one of the grounds for cessation of their international protection status, while visiting Ukraine does not affect temporary protection status. Nevertheless, in 2023 as well as in 2024 PIC observed that in practice there was less hesitation in this regard than in 2022, as it became apparent that the war in Ukraine would last longer than initially anticipated and no post-TPD plan for persons who fled Ukraine and are residing in Slovenia has been announced by the Government yet.

Third country nationals and stateless persons

As stipulated in the Government Decision, besides citizens of Ukraine, stateless persons and third-country nationals who were granted international protection or other equivalent national protection in Ukraine, and stateless persons and third-country nationals who resided in Ukraine on the basis of a valid permanent residence permit and who are unable to return to their country or region of origin in a safe and sustainable or lasting manner, are entitled to temporary protection. Another category of third country nationals and stateless persons that are eligible for temporary protection are family members as defined in the Government Decision with reference to Article 36 of the ZZZRO, where the families were already residing in Ukraine before 24 February 2022 and provided they have themselves been displaced on or after 24 February 2022. When presenting themselves to the competent authorities in the Republic of Slovenia, family members of an Ukrainian national or of a stateless person or third-country national who was granted international protection or other equivalent national protection in Ukraine, need to prove that they were displaced on or after 24 February 2022 and provide documentary evidence attesting family relationship or family unity and that the family was present and residing in Ukraine before 24 February 2022.

In accordance with the TPD, Member States may also extend temporary protection to all other stateless persons or nationals of third countries other than Ukraine residing legally in Ukraine who are unable to return in safe and durable conditions to their country or region of origin, which could include third-country nationals who were studying or working in Ukraine on a short-term basis at the time of the events leading to the mass influx of displaced persons. However, in Slovenia this option has so far not been exercised and is not reflected in the Government Decision. Third country nationals and stateless persons who are eligible per the Government Decision need to be able to prove that they fulfil the eligibility criteria by presenting the relevant documents to the competent authorities (*i.e.*, either to the Police, who then submit the application for temporary protection and supporting documents to the competent administrative unit, or to the latter authority directly). Other groups, such as students who were staying in Ukraine on a short-term basis and who do not have a permanent residence permit, are therefore not included under this scope.

In accordance with the ZZZRO, temporary protection is also granted to a new-born whose parent or parents enjoy temporary protection.²⁹

²⁷ See for example: N1info, *Ukrajinski kolesarji v Kočevju: raje turistični vizum kot pridobivanje azila*, 2 April 2022, available in Slovenian [here](#), regarding Ukrainian cyclists, members of the youth Ukrainian mountain biking team, who intended to apply for temporary protection in Slovenia, however they were considered ineligible as they left Ukraine in January, *i.e.*, before the start of the war, to compete abroad. They estimated that obtaining international protection would have some disadvantages for them, especially as applicants for international protection are not allowed to leave the municipality in which they have an address of temporary residence while waiting for their application to be approved (except in certain cases decided by an authorised official). Applicants for temporary protection, on the other hand, can move freely around Slovenia and it is also, in principle, not prohibited by law for them to leave the country. As reported, this would have been a problem for the members of the Ukrainian national mountain biking team, as they had competitions abroad.

²⁸ Article 67(1) International Protection Act, Official Gazette of RS, No. 16/17 and subsequent amendments.

²⁹ Article 19(4) ZZZRO.

People fleeing Ukraine, who do not fall under the scope of the temporary protection regime, including family members that are not eligible for temporary protection in view of the criteria of having been displaced on or after 24 February 2022 and of providing documentary evidence of family relationship, can apply for international protection in line with the International Protection Act (IPA). As PIC observed, in practice, this has caused certain issues to nationals of Ukraine and their family members who are not included under the scope of persons eligible for temporary protection, as they have to apply in separate procedures for different types of protection, *i.e.*, temporary and international protection, in order to be able to legally stay in Slovenia, which also entails certain differences in their rights and being subject to restrictions or not. Illustratively, applicants for international protection are in general not allowed to leave the municipality in which they have an address of temporary residence while waiting for their application to be approved. Furthermore, as soon as the positive decision on their asylum applications becomes enforceable,³⁰ *i.e.*, within 15 days of being granted status, international protection holders are also obliged to leave the accommodation centres.³¹ Meanwhile, in line with the current legislation, no such limitation with respect to accommodation in accommodation centres is in force for TP holders. The procedure for international protection is generally also much longer than the procedure for temporary protection, which consequently leads to family members that are entitled to TP enjoying the related rights (such as financial aid, the right to work etc.) much sooner than those that apply for and are granted international protection.

Extension of TPD

In accordance with the Government Decision establishing temporary protection, the duration of temporary protection, activated in March 2022, was initially determined to be for one year, until 4 March 2023, reflecting the Council Implementing Decision (EU) 2022/382, with the possibility of being extended for a maximum of two times for periods of six months each.

Lastly, temporary protection for displaced persons from Ukraine in Slovenia was extended until 4 March 2026 following the Council Implementing Decision (EU) 2024/1836 of 25 June 2024. To allow for extension of temporary protection in Slovenia for an additional year, on 5 September 2024 the Decision establishing temporary protection for displaced persons from Ukraine was amended.³²

As was done for the previous extensions of temporary protection,³³ in the case of persons who have already been granted temporary protection, the administrative units will *ex officio* issue new identity cards with the new validity (until 4 March 2026), which will replace their current identity card valid until 4 March 2025. In the previous processes of re-issuing the identity cards, PIC has received information from a few individuals regarding certain delays in the issuance of the updated identity cards, although in general no major issues were reported.³⁴ In all procedures for the granting of temporary protection in which a decision has not yet been made, in the event of a positive decision, the administrative units will issue a temporary protection identity card valid until 4 March 2026.

C. Access to temporary protection and registration

1. Admission to territory

No reports by NGOs, media or testimonies collected by PIC or any other organisation on people fleeing Ukraine that would be refused entry at the border were made public.

It was, however, reported to PIC by the General Police Directorate in January 2025 that 16 citizens of Ukraine were refused entry in 2024, with explanation that none of them were considered displaced

³⁰ Article 78(2) IPA.

³¹ Article 70 (1) IPA.

³² Decision on amending and supplementing the Decision establishing temporary protection for displaced persons from Ukraine, Official Gazette of RS, No. 74/24.

³³ Government of the Republic of Slovenia, *Podaljšanje začasne zaščite za razseljene osebe iz Ukrajine še za eno leto*, 19 January 2024, available at: <https://bit.ly/48PhRkm>.

³⁴ Practice-based observation by PIC, January 2025.

persons from Ukraine and that the Police do not deny displaced persons entry into the country and access to temporary protection. No reasons for the refused entry in the mentioned cases have been provided by the General Police Directorate.

Further, there have been no officially reported cases or any evidence of issues for people who returned to Ukraine and sought to re-enter Slovenia in 2023. In comparison to 2022, there have also been fewer mentions made to PIC lawyers of temporary protection holders who had issues at the Hungarian and other borders when travelling abroad and returning to Slovenia.

For citizens of Ukraine, entry into Slovenia is lawful on several bases. Firstly, based on Regulation (EU) 2018/1806 of the European Parliament and Council that established which third country nationals must be in possession of a visa when crossing the external borders of the EU and which are exempt from that requirement, Ukraine is one of the third countries whose nationals are exempt from the requirement to be in possession of a visa when crossing the external borders of the member states for stays of no more than 90 days in any 180-day period. The exemption from the visa requirement is limited to the holders of biometric passports issued by Ukraine.³⁵ In line with this, Ukrainian nationals do not require a visa to enter Slovenia and are legally able to stay in the country for up to 90 days in any period of 180 days, the same as for any other foreigners who, on the basis of the legal system of the European Union or an international treaty or a decision of the Government of the Republic of Slovenia, does not need a visa to enter and stay in the Republic of Slovenia.³⁶

After the expiration of the allowed short-term residence, their stay in the country is illegal unless they obtain another basis for residence in Slovenia.³⁷

Some flexibility on entry conditions was established on humanitarian grounds according to information from the Government of the Republic of Slovenia.³⁸ Illustratively, according to the latter, if residents of Ukraine enter the Republic of Slovenia without proper documents, e.g., only with internal documents (Ukrainian passports) that are not biometric and without a visa, the Police will take into account the individual circumstances and the situation in Ukraine, and merely issue a warning to the individual without a fine. In other circumstances, such entry into the territory would be considered an offense under the Foreigners Act. Regardless, such persons then do have to promptly obtain a legal basis for residence in Slovenia.

People fleeing from Ukraine can also apply for temporary or international protection in Slovenia after their other legal basis for residence in Slovenia (e.g., short-term visa-free stay) expires or immediately when crossing the border. A person who expresses their intention to seek temporary protection in the Republic of Slovenia should be treated as an applicant under the ZZZRO and shall therefore be permitted to enter the country.³⁹ As aforementioned, persons fleeing from Ukraine also have the option to express an intention to apply for international protection in which case, they cannot be deported from the country from the moment they have expressed the intention, in accordance with the IPA.⁴⁰

In accordance with Article 7 of the ZZZRO, a displaced person as referred to in the Act who, during the period of temporary protection and until the quota determined by the Government has been filled, illegally enters the territory may seek temporary protection from the competent authority as long as they do so within three days. A displaced person who enters the Republic of Slovenia outside a border crossing point and who seeks temporary protection from the competent authority within the mentioned time limit in

³⁵ Regulation (EU) 2018/1806 of the European Parliament and of the Council of 14 November 2018 listing the third countries whose nationals must be in possession of visas when crossing the external borders and those whose nationals are exempt from that requirement (codification), OJ L 303/39, available [here](#).

³⁶ Article 14(2) Foreigners Act.

³⁷ Article 60 Foreigners Act.

³⁸ The official Government website: Republic of Slovenia, *Support for Ukrainian Nationals in Slovenia*, available [here](#).

³⁹ Article 16(1) ZZZRO.

⁴⁰ Article 36(1) IPA.

accordance with the Article 7 shall not be deemed to have committed a minor offence pursuant to the Act governing state border control.⁴¹

Moreover, with regard to the waiving of customs duties and measures to facilitate the entry of pet animals travelling with their owners from Ukraine, the Providing operational guidelines for external border management to facilitate border crossings at the EU-Ukraine borders, published by the Slovenian Administration for Food Safety, Veterinary Sector and Plant Protection (AFSVSPP) on 28 February 2022 foresees the provisional authorisation of entry for pet animals on the basis of a completed application and under the conditions set out in the application to ensure that the entry of these animals into the EU does not pose a risk of rabies introduction/transmission.⁴² A contact point has been established at the headquarters of AFSVSPP to accept applications. However, as of 1 March 2023, based on Article 32 of Regulation (EU) 576/2013 on the non-commercial movement of pet animals, the AFSVSPP no longer allows the entry of pet animals from Ukraine under the simplified procedure, which means that dogs, cats and ferrets must comply with the conditions set in the Regulation.⁴³

2. Freedom of movement

Persons entitled to temporary protection who do not hold a biometric travel document do not experience any particular issues with Slovenian authorities, when moving within the territory of Slovenia or while attempting to continue their journey towards other European countries. However, persons not entitled to temporary protection will be restricted in their movements if they apply for international protection (see [General Report – Freedom of movement](#)), which may also impact persons entitled to temporary protection of the same family unit.

Entry into the national territory and moving within the country was also facilitated for persons fleeing Ukraine. Moreover, vehicles with a maximum permissible weight of up to 3.5 tonnes (most passenger cars and light combination vehicles) with Ukrainian number plates are, until further notice, exempt from tolls on toll roads (purchasing the e-vignette), but only for the purpose of entering or crossing the Republic of Slovenia in transit. If the drivers of these vehicles stay in the Republic of Slovenia and use toll roads during their stay in the country, they must obtain an appropriate e-vignette for their vehicles.⁴⁴

3. Registration under temporary protection

In Slovenia registration occurs when the application is submitted to the competent authority.

As stipulated in Article 16 of the ZZZRO,⁴⁵ upon entry into the Republic of Slovenia, an applicant shall complete an application for temporary protection with the authority responsible for border crossing control, *i.e.*, the Police, and shall present all the evidence at their disposal which is relevant for the decision on granting temporary protection. The Police shall then immediately submit the application and supporting documents to the competent authority for processing and deciding on granting temporary protection, which is the administrative unit in the territory where the applicant is staying.

Displaced persons illegally entering into the Republic of Slovenia and those already present in the territory shall, without delay and within three days at the latest, complete an application for temporary protection and submit it to the local police office located in the area where the person in question is staying or to the administrative unit in the area where the person is staying together with all documents held by them that are relevant to deciding on the granting of temporary protection.⁴⁶ If in these two cases the application is

⁴¹ State Border Control Act, Official Gazette of RS, no. 35/10 and subsequent changes.

⁴² Government of the Republic of Slovenia, *Derogation for non-commercial movements of pets due to the exceptional situation in Ukraine*, available [here](#).

⁴³ Government of the Republic of Slovenia, *Termination of simplified procedure for non-commercial movements of pets due to the exceptional situation in Ukraine*, available [here](#).

⁴⁴ DARS, *Obrazec za oprostitev cestnine zaradi humanitarne pomoči*, 3 March 2022, available in Slovenian [here](#).

⁴⁵ Article 16(3)-(4) ZZZRO.

⁴⁶ Article 16(5) ZZZRO.

submitted to the Police, the Police shall forward it without delay to the administrative unit where an applicant for temporary protection is staying.

Administrative units then process and decide on whether an applicant fulfils the conditions to be granted temporary protection determined by this Act in a summary fact-finding procedure⁴⁷ and must therefore issue and serve the decision as soon as possible or at the latest within one month from the day of receiving a complete application for initiating an administrative procedure in accordance with Article 222, paragraph 1, of the General Administrative Procedure Act.⁴⁸ If the administrative unit fails to issue a decision and serve it to the applicant in due time, the applicant has the right to appeal it as if their claim had been refused in accordance with the General Administrative Procedure Act.⁴⁹

An appeal may be filed against a decision of an administrative unit deciding on the granting of temporary protection within 15 days of the date of service. An appeal stays the execution of the decision and is decided on by the Ministry.⁵⁰

In 2024, 5 second-instance decisions were issued in appeal procedures lodged against negative decisions on applications for temporary protection. One of these decisions was positive. The average duration of the appeal procedure was 63 days.⁵¹

In case of a positive decision, the applicant receives an identity card, which also serves as a permit for temporary residence in the Republic of Slovenia.⁵² In case of a decision dismissing or withdrawing temporary protection or rejection order rejecting the application, the applicant receives a written decision which indicates the time limit by which they must have left the country. A person failing to leave the Republic of Slovenia by the determined time limit is subject to the provisions on the removal of foreigners of the Foreigners Act.⁵³

Time limit for application

As aforementioned, in accordance with the Article 16 of ZZZRO, applicants illegally entering into the Republic of Slovenia and applicants already present in Slovenia shall, without delay and within three days at the latest, complete an application for temporary protection. The law on temporary protection does not however stipulate any consequence for exceeding the determined time limit and no consequences have been detected by PIC in practice so far.

A time limit that also needs to be considered is that of the allowed short-term stay (visa-free regime) for citizens of Ukraine. Under this regime, Ukrainian citizens may reside in Slovenia for up to 90 days within a 180-day period, after which they need to obtain another legal basis for residence in Slovenia.⁵⁴

Evidence

When applying for temporary protection, applicants are required to provide evidence at their disposal in order to prove they fall under the scope of this protection regime.⁵⁵ However, the law regulating temporary protection does not further define said evidence. Based on the experience of temporary protection beneficiaries shared with PIC, it was noted that, in general, the relevant documentation in the procedure for the granting of temporary protection is considered to include documentary evidence that can help establish the identity, residence of the person and the moment at which the person left Ukraine, which

⁴⁷ Article 19(2) ZZZRO.

⁴⁸ General Administrative Procedure Act Official Gazette of RS, No. 24/06 and subsequent amendments.

⁴⁹ Article 222(4) General Administrative Procedure Act.

⁵⁰ Article 20(1)-(2) ZZZRO.

⁵¹ Official statistics provided by the Ministry of the Interior, April 2025.

⁵² Article 19(1)-(3) ZZZRO.

⁵³ Article 19(5) ZZZRO.

⁵⁴ Article 14(2) Foreigners Act.

⁵⁵ Article 16(3) ZZZRO.

are determining factors for being eligible for temporary protection, and documentation attesting family relationship or family unity and dependency with close relatives when relevant.

The authority that receives the application and supporting documents issues a written acknowledgement of receipt of application to the applicant.⁵⁶

Issues in registration for TPD

In 2022, as part of PIC's project of providing information and legal counselling to refugees, supported by the United Nations High Commissioner for Refugees (UNHCR), a Mobile Blue Dot, consisting of lawyers and an interpreter, was established to provide support to Temporary Protection (TP) seekers/holders. The Mobile Blue Dot, operated by PIC, continued to conduct regular visits to accommodation centres and provide group and individual legal counselling⁵⁷ in 2024 and had planned to continue in 2025, albeit on a reduced scale, with fewer consultations and field visits. However, in March 2025, PIC's future activities related to TP became uncertain due to the drastic cuts in U.S. funding to the UNHCR and other UN agencies, thus also affecting financial support for PIC's project. While providing counselling to TP applicants and beneficiaries, in the early months of TP activation in 2022, PIC received some reports of significant delays in people receiving a decision on their temporary protection status from the administrative units. While in 2024 most administrative units, on average (calculated by dividing the difference between the date of receipt of each application and the date the decision was issued by the total number of decisions issued in the respective administrative unit), issued decisions within 30 days, some administrative units still significantly exceeded the legislative time limit. In 2024, the longest average processing time was again—just as in 2023—recorded in the administrative unit of Škofja Loka, at 159.4 days, while the shortest average time of just 2 days was documented in Lendava.⁵⁸

The reasons for the backlogs can mostly be attributed to administrative units being overloaded with applications that they were not able to process in time as they were not fully prepared from an organisational standpoint, especially in the first few months of activating temporary protection in Slovenia, as observed by PIC. Additionally, there is a general understaffing of administrative units, which are also unequal both in terms of size and workload, which can affect how long applicants are waiting to be granted temporary protection depending on which administrative unit is processing their applications, and consequently their ability to enjoy the rights as temporary protection beneficiaries, including the right to work, financial assistance, etc.

The duration of the procedures for obtaining temporary protection (and thus related rights) in certain administrative units was expressed as concerning also by the Human Rights Ombudsman of the Republic of Slovenia in his annual report for 2022, the reason for which the Ombudsman attributed to staff shortage based on collected information and his observations.⁵⁹ However, in 2024 there were much fewer such reports made to PIC and most of them were also found to be related to incomplete applications, with the context that fewer TP applications were submitted in 2023 and 2024 compared to 2022 (8,445).

Another issue observed by PIC was that, until June 2022, written administrative decisions were issued instead of identity cards, which caused some beneficiaries of temporary protection to have issues at foreign borders when traveling to Ukraine and back to Slovenia. The authorities responsible for border crossing control reportedly did not recognise the document, *i.e.*, the written administrative decision, as it was not in the form of an identity card, despite the decision granting the person the status of temporary protection in Slovenia and all the related rights and obligations. However, the procedure is simpler and faster since identity cards are being issued instead of the written administrative decisions, which also facilitate travelling to other countries and returning to Slovenia. Nonetheless, some issues regarding the recognition of temporary protection identity cards by foreign border control authorities persisted in 2024,

⁵⁶ Article 16(8) ZZZRO.

⁵⁷ For individual legal counselling at PIC's office or online/via telephone, one can also apply for an appointment through e-mail or by filling out an online form provided on PIC's website [here](#).

⁵⁸ Official statistics provided by the Ministry of the Interior, April 2025.

⁵⁹ Human Rights Ombudsman of the Republic of Slovenia, *The 28th Annual Report of the Human Rights Ombudsman of the Republic of Slovenia for 2022*, available in Slovenian [here](#), 483-484.

reportedly due mainly to the material used for the TP cards issued in Slovenia, as they are simply laminated,⁶⁰ rather than made from a more secure and durable material.

4. Legal assistance

In accordance with Article 37 of the ZZZRO, persons *enjoying temporary protection* enjoy the right to free legal aid in accordance with the act governing free legal aid.

As free legal aid is foreseen only for persons that have already been granted temporary protection, the law does not provide free legal aid for applicants for temporary protection (neither in first nor in second instance procedures, for example to appeal a decision on granting temporary protection) that would be funded through the State budget. Free legal aid is however provided by non-governmental organisations, such as PIC, which in 2024 continued to provide legal assistance to applicants as well as to persons granted temporary protection, which includes familiarising applicants for temporary protection with their rights and obligations in Slovenia, representing applicants at application submissions, providing relevant information and offering legal advice, all within the project funded by the UNHCR-Counselling and representing asylum applicants in Slovenia. Legal assistance by PIC is provided through regular visits to accommodation centres, organised with a permission from the UOIM, according to a set schedule (for example every two weeks in **Logatec**, once a month in **Debeli Rtič**, etc., with the frequency adjusted based on the needs and the approximate number of inquiries). In 2024, PIC lawyers provided legal counselling in large part through one-on-one sessions in person at PIC's office as well as online. Out of 753 cases of legal counselling 321 were carried out online, via telephone or in person at the PIC's Office, whilst others were provided in accommodation centres and other UOIM's capacities either in groups or individually.

The Faculty of Law of the University of Ljubljana has also been offering free legal assistance to Ukrainian citizens who apply for protection in Slovenia. Legal information is provided within the Legal Clinic for Refugees and Foreigners, in which students of the Faculty of Law participate, sometimes consulting with other individuals and institutions involved in the provision of assistance to refugees. Consulting is mainly provided via e-mail.⁶¹

As for persons enjoying temporary protection, free legal aid is available in accordance with the Legal Aid Act, as aforementioned.⁶² It can be granted for legal advice, legal representation and other legal services specified by law, for all forms of legal protection before all courts of general jurisdiction and specialised courts in the Republic of Slovenia, before the Constitutional Court of the Republic of Slovenia and before all authorities, institutions or persons in the Republic of Slovenia, which are responsible for the out-of-court settlement of disputes and as an exemption from paying the costs of court proceedings. Free legal aid is also granted for proceedings before international courts or arbitrations, if the right to free legal aid is not regulated by the rules of the international court or arbitration, or if the individual is not entitled to it according to the rules on free legal aid.

A person is entitled to free legal aid if, given their material situation and the material situation of their family, they would not be able to afford the costs of court proceedings or the costs of obtaining legal aid without jeopardising their social situation and that of their family.⁶³

As PIC observed, one of the issues for persons entitled to temporary protection to accessing free legal assistance continues to be the lack of information on how to do so, *i.e.*, to fill out the form at the competent court. For PIC's legal assistance, one practical obstacle has been reaching applicants and beneficiaries of temporary protection that have settled in private accommodations since entering Slovenia, meanwhile

⁶⁰ Article 4(2) Rules on the application for granting temporary protection and on the identity card of persons enjoying temporary protection.

⁶¹ University of Ljubljana, *Brezplačni pravni nasveti in pomoč ukrajinskim državljanom*, available in Slovenian [here](#).

⁶² Legal Aid Act, Official Gazette of RS, No. 96/04 and subsequent amendments.

⁶³ Article 13(1) Legal Aid Act.

legal information and counselling sessions for persons in reception/accommodation centres and other state facilities has not been an issue, as all the needed information was provided by the UOIM and the frequent, regular visits are still arranged in cooperation with said accommodations.

5. Information provision and access to NGOs

Article 15 of the ZZZRO, which foresees procedural rights, stipulates that an applicant for temporary protection shall be provided all information concerning the procedure for the granting of temporary protection in a language that they understand and shall have the right to follow the procedure and participate therein in a language that they understand. An applicant may, at any time, contact non-governmental, international and other organisations assisting refugees. By law, the UOIM shall provide applicants this information through information booklets and by establishing an information service.⁶⁴

The right to be informed is regulated in Article 38 of the ZZZRO, stipulating that persons enjoying temporary protection must be informed of the rights and obligations arising from this Act in a language they understand. The UOIM shall provide them the necessary information, in particular regarding accommodation, claiming financial assistance, health care, education and employment, in a language they understand. Moreover, the Decree on the methods for ensuring the rights of persons enjoying temporary protection stipulates in Article 2, paragraph 3, that the UOIM shall provide information to applicants for temporary protection by issuing informative brochures in electronic and printed form and by organising an information service. Article 24 provides that UOIM shall organise the briefing of persons with temporary protection on their rights and duties, as determined by law, in electronic and printed form or in another appropriate way.

In practice, this has been realised by the UOIM setting up a government call centre, through which information is provided about the assistance that Slovenia provides to displaced persons from Ukraine, about entry and residence in Slovenia, about the procedure for recognising temporary protection and information on how individuals or organisations can provide financial or material assistance, in a language they understand. The call centre works every working day from 9 a.m. to 3:30 p.m. The UOIM has also established a special email address for any inquiries. Current information and contact numbers are also published on the official website in Slovenian and Ukrainian language and are being duly updated.⁶⁵ As pointed out to PIC by users of the website, some had issues finding the needed information, especially the forms that need to be filled out to apply for financial support, which remained an issue in 2024.

On the UOIM's website, a brochure in Ukrainian language, containing information on temporary protection, has also been available since 2022. Per the latest information by the General Police Directorate, applicants for temporary protection are (only) verbally informed about their rights during the registration process at the Police. UNHCR also prepared a poster intended for providing information, but due to a printing error it was not distributed to the police units yet.⁶⁶ PIC was informed by the UOIM⁶⁷ that no such physical information booklets/brochures were issued by the UOIM so far and that, in 2024, information remained available to individuals online, in person (within accommodation centers and when visiting other UOIM's facilities, during office hours three times a week in both Ljubljana and Maribor), and by telephone.

PIC has observed that many applicants for temporary protection and TP beneficiaries they assisted during consultations were not sufficiently informed especially about the difference between different forms of protection, *i.e.*, temporary and international protection. A key concern raised in previous reports to PIC was that Police had already informed persons entering Slovenia about the form of protection they were supposedly entitled to and directed them to apply for it, without providing comprehensive information. This is despite the fact that in Slovenia there is no legal restriction preventing individuals fleeing Ukraine

⁶⁴ Article 15(1)-(3) ZZZRO.

⁶⁵ The official Government website: Republic of Slovenia, *Support for Ukrainian Nationals in Slovenia*, available [here](#).

⁶⁶ Information provided by the General Police Directorate, January 2025.

⁶⁷ Information provided by the UOIM, January 2025.

from applying for international protection, as opposed to only temporary protection. As such, it is within the rights of a person seeking protection to choose which procedure to initiate, with the competent authority then determining the person's eligibility based on the relevant documentation provided. While in 2024 there were no new reports of such specific cases, this issue remains a concern as it is mostly related to the lack of information when entering the country, which is still present.

Persons that are accommodated in accommodation centres can also turn to social workers for help with basic information regarding their rights and for some practical questions (e.g., how to obtain a tax number).

A significant part of providing important information was taken upon by several non-governmental organisations. In 2024, PIC continued to provide key information related to the temporary protection in Slovenia, as well as with regard to further integration into Slovenian society, including information on the Slovenian healthcare system, working in Slovenia (different types of contracts under which a person can work, workers' rights in Slovenian labour law etc.), on legal bases for residing in Slovenia after temporary protection ceases (e.g., how to obtain a single residence and work permit and family reunification), acquisition of citizenship and return to the country of origin. As noted by PIC, in 2024 the vast majority of inquiries, the same as in the previous year, related to the uncertainty regarding the options for transitioning from temporary protection to other legal statuses once TPD ceases to apply, mostly on the basis of employment or studies, as under the current law such transition is not possible. Concerns were expressed by TP holders also in relation to the current lack of legal basis for obtaining residence permit in Slovenia specifically for persons with health issues and the elderly that would not be able to return to Ukraine, while they would also not be able to obtain work or other type of permit as provided in the Foreigners Act.

In 2024, several programmes were carried out in accommodation centres, where Temporary Protection seekers and holders are accommodated. As explained by the UOIM,⁶⁸ the implementation of the workshops and their scope may have differed between accommodation centres:

- The [Slovenian Red Cross](#), based on the cooperation agreement with the UOIM, carried out various activities for TP applicants/beneficiaries in the asylum home branches and accommodation centres, which entailed the presence of Tracing Service, the delivery of material assistance, and presence at locations.
- As part of the UNHCR-funded project, [Institute Emma](#) provided psychosocial counselling and activities aimed at preventing and responding to gender-based violence. As part of the program, individual and group counselling and workshops on awareness-raising and violence prevention and child protection were implemented at all UOIM locations.
- The humanitarian organisation [Adra Slovenia](#), based on the cooperation agreement, coordinated volunteer activities and provided support at the asylum home branch in Logatec and in accommodation centres, carried out activities and workshops, provided transportation for users and escorts, and donated various material and other necessities.
- PIC, with the support of UNHCR, provided counselling, information, and assistance to TP applicants/beneficiaries.
- Based on a public call, Society Ključ has been implementing the "Prevention of Human Trafficking, Sexual Violence and Support for Women" programme since November 2023, which is financed from the Asylum, Migration and Integration Fund and the budget of the Republic of Slovenia. The purpose of the operation is to raise awareness among people who mostly do not recognize the dangers and consequences of human trafficking, sexual violence and gender-based violence and to encourage them to actively participate in preventing various forms of exploitation with an appropriate approach. The goal of the operation is to identify and inform potential victims of human trafficking and sexual violence and gender-based violence, to treat them appropriately, and to provide administrative support to the working group appointed on the basis of the Standard Operating Procedures for the Prevention and Action in Cases of Sexual

⁶⁸ Information provided by the UOIM, January 2025.

Violence and Gender-Based Violence against persons treated under the provisions of the ZZZRO.

- The Rokavička Institute - Ukrainian Center in Slovenia conducted activities at the Postojna accommodation center three times a week, while the Red Noses Association held four visits in one month, twice during the year.

The mentioned activities carried out throughout 2024 are planned to continue in 2025.⁶⁹

Within the project implemented by PIC, in 2024, 753 displaced persons from Ukraine were assisted (those staying in accommodation centres and those in private accommodation altogether). Other non-governmental organisations have also been providing information in several fields, among them [Slovene Philanthropy](#), which has been providing key information and certain legal help, related to the stay in the Republic of Slovenia and regarding other rights under temporary protection.⁷⁰ In 2022 Slovene Philanthropy also created informative videos with Ukrainian subtitles to help persons with temporary protection familiarise themselves with their rights and obligations, which are still accessible.⁷¹

Moreover, in December 2022 the European Union Agency for Asylum (EUAA) has signed an Operational Plan with the Republic of Slovenia for the provision of technical and operational assistance by EUAA to Slovenia. The Operational Plan, with the implementation period from the date of signing by the last of parties until 30 June 2023, came at the request of the Slovenian Ministry of Interior with the aim to support the national authorities in achieving three main objectives, including: implementing quality preliminary and asylum procedures, enhancing national capacity to provide adequate reception conditions and implementing Temporary Protection Directive, by helping with the provision of agreed-upon information to people fleeing Ukraine, as well as helping to manage the reception facilities where Temporary Protection beneficiaries reside.⁷² However, according to the Ministry of the Interior, the Republic of Slovenia did not receive EUAA support in the area of temporary protection.⁷³

Risks of exploitation and human trafficking

The Government has placed a special emphasis on persons fleeing the war in Ukraine being at risk of becoming victims of trafficking or other forms of exploitation. The authorities warn that many people are offering to help Ukrainian nationals, including with offering private accommodation, work and transportation to other countries but some of these may in fact be traps in which persons can fall victims to traffickers. It is also emphasized that women and children are a particularly vulnerable group in terms of human trafficking and anybody that detects any suspicious circumstances or believes they could be a victim of trafficking, is encouraged to call the police, or get in touch with anti-trafficking non-governmental or humanitarian organisations at the listed contact telephone numbers or e-mail addresses ([Caritas Slovenia](#), [Society Ključ – Centre for Fight against Trafficking in Human Beings](#), [Slovene Philanthropy](#), which also provide some information regarding risks for displaced persons from Ukraine).⁷⁴ Some NGOs also participate in the Interdepartmental Working Group for the fight against human trafficking, which brings together ministries and government departments as well as non-governmental organisations.⁷⁵

Upon the arrival of refugees from Ukraine, the National Working Group on Combating Trafficking in Human Beings warned about the risks posed by the crisis in Ukraine in relation to human trafficking.⁷⁶

⁶⁹ *Ibid.*

⁷⁰ Slovene Philanthropy, *REFUGEES FROM UKRAINE*, available [here](#).

⁷¹ Slovene Philanthropy, *POMEMBNE INFORMACIJE ZA TISTE, KI NUDITE POMOČ BEGUNCEM IZ UKRAJINE*, available [here](#).

⁷² European Union Agency for Asylum, *EUAA deploys to Slovenia to support with asylum and reception, as the number of applications in Europe rise*, 20 December 2022, available [here](#).

⁷³ Information provided by the Ministry of the Interior, April 2025.

⁷⁴ Government of the Republic of Slovenia, *Combating trafficking in human beings*, available [here](#).

⁷⁵ Government of the Republic of Slovenia, *The National Working Group for Combating Trafficking in Human Beings*, available [here](#).

⁷⁶ Government of the Republic of Slovenia, *Combating trafficking in human beings*, available [here](#).

As published on the Government website in 2022, in the accommodation facilities in **Logatec** and **Debeli Rtič**, cases were detected where individuals were looking for or attempting to establish contacts with women refugees from Ukraine, offering marriage arrangements and accommodation in private apartments in exchange for providing sexual services and performing various household chores. A suspicious ad for a job in the fashion industry was also detected.⁷⁷ According to information provided by UOIM (January 2025), no risks related to human trafficking were detected among applicants and persons with temporary protection in 2024, with Society Ključ having conducted 34 awareness sessions on the dangers of human trafficking.

This issue was also addressed by the Human Rights Ombudsman of the Republic of Slovenia, who in relation to the risks of human trafficking inquired the UOIM, Ministry of the Interior and Ministry of Labour, Family, Social Affairs and Equal Opportunities about any taken action in this respect. In response, in November 2022, the Ministry informed the Ombudsman that the Police had detected and dealt with five cases in which suspicions of a criminal offence of human trafficking in which citizens of Ukraine were allegedly exploited as victims.⁷⁸ However, PIC obtained additional information from the General Police Directorate stating that, to date, the Police have not handled any cases involving Ukrainian citizens with temporary protection in Slovenia as victims of human trafficking. They have, however, dealt with potential victims of human trafficking, but the latter were already residing in Slovenia before the outbreak of the war in Ukraine.⁷⁹

The US department of State's latest available Trafficking in Persons Report on Slovenia (published in 2024 with an analysis of the situation in 2023), mentions that in 2023 the Slovenian Government officials continued to use the National Manual for Identification of Victims of Trafficking in Persons. Police also developed indicators, including for at-risk groups such as unaccompanied minors and refugees from Ukraine, and distributed these to NGOs and first responders. The Government finalised the guidelines for labour inspectors to identify victims and published them on its anti-trafficking website as well as increased victim protection efforts. In 2023, the government identified 24 confirmed victims of sex trafficking, of which 23 were foreign national women from Ukraine, Bosnia and Herzegovina, Montenegro, Croatia, the People's Republic of China, Romania, and Serbia. The report highlights that since the start of Russia's full-scale invasion, the Government, in collaboration with NGOs, expanded public awareness campaigns on trafficking risks among refugees fleeing Ukraine. It also notes that authorities identified one sex trafficking victim from Ukraine and 42 potential sex trafficking victims.⁸⁰

The 2024 Trafficking in Persons Report also mentions that both Slovenes and foreign workers, as well as undocumented migrants are at risk of labour trafficking, including forced begging, domestic servitude, or in a variety of sectors such as construction, transportation, carwashes, and hospitality. Ukrainian refugees, particularly women and children, fleeing the war in Ukraine, continue to be vulnerable to trafficking. Authorities reported that sex traffickers were targeting Ukrainian refugee women at a government-run accommodation facility.⁸¹

Moreover, it is also stated in the report that the Government of Slovenia maintained prevention efforts, as the Ministry of Interior's (MOI) national coordinator for countering trafficking in persons continued to lead the Interdepartmental Working Group (IWG), which included NGO, police, and MOI representatives. The IWG met twice in the reporting period to organise and coordinate awareness efforts and twice to discuss forced labour, protections among asylum-seekers, and trafficking trends involving unaccompanied minors. The Government also implemented its anti-trafficking 2023-2024 NAP, which focused on trainings, awareness activities and victim protection. The government thus allocated € 10,000 for

⁷⁷ See for example articles explaining several examples of potential abuses people fleeing Ukraine are exposed to: N1, "Na mejo po novo ženo": vojna odpira prostor za izkoriščanje ljudi v stiski, 15 March 2022, available in Slovenian [here](#) and N1, Zloraba begunk? Oglas v Logatcu v ruščini ponuja manekensko delo, 12 April 2022, available in Slovenian [here](#).

⁷⁸ Human Rights Ombudsman of the Republic of Slovenia, *The 28th Annual Report of the Human Rights Ombudsman of the Republic of Slovenia for 2022*, available in Slovenian [here](#), 484.

⁷⁹ Information provided by the General Police Directorate, January 2025.

⁸⁰ U.S. Department of State, *2024 Trafficking in Persons Report: Slovenia*, available [here](#).

⁸¹ *Ibid.*

prevention efforts, including awareness raising projects in 2023, compared to € 10,200 in 2022 and no funding in 2021. Additionally, in collaboration with the EU, the Government contributed € 100,000 to a program aimed at raising awareness for asylum-seekers about the risks of human trafficking. The Government, independently and in cooperation with NGOs, carried out various awareness campaigns on forced labour, while the MOI continued to employ a dedicated staff member to educate children and adolescents through ongoing workshops in all primary and secondary schools. The Government also maintained a website, available in English and Slovenian, that provided information on forced labour and labour exploitation through its manual for companies and employers, guidance on contacting NGOs, and a portal for anonymously reporting potential trafficking crimes.⁸² Furthermore, the Government continued to fund at least one NGO hotline, available in multiple languages, aiding victims of domestic violence and trafficking. In 2023, the Government passed a decree to regulate accommodations for unaccompanied minors, who remain a particularly vulnerable group.

In 2024 no new such cases have been detected by the UOIM.⁸³

Information provision at the border

The Police, as the authority responsible for border crossing control, orally provide information on the procedure for temporary protection (basic information on the process and the rights and obligations of applicants and beneficiaries). Individuals can directly fill out an application for temporary protection and submit the relevant documents to the Police upon entry into the Republic of Slovenia. In practice, in 2024 PIC has continued to notice that many applicants were lacking basic information regarding the duration of the temporary protection procedure (e.g., deadline for issuing a decision) and relating to their rights as temporary protection beneficiaries or applicants. We have, however, detected that in general, persons that were younger and more digitally savvy were more familiar with the relevant information, considering it is provided on the Government's website, while especially those who are older had certain issues.

D. Guarantees for vulnerable groups

Categories of people considered to be vulnerable are defined in the ZZZRO as persons with special needs, in particular unaccompanied minors, persons with disabilities, elderly persons, pregnant women, unaccompanied women, single parents with minor children, victims of sexual abuse and victims of torture or organised violence.⁸⁴

Concerning any implemented procedure for conducting a vulnerability assessment of applicants for temporary protection, General Police Directorate explained that all applicants for temporary protection are treated individually with regard to their potential vulnerability.⁸⁵ The types of vulnerabilities that the Police systematically identify include especially unaccompanied minors, women, disabled people, elderly people, pregnant women, single parents, a person exposed to psychological, physical or sexual violence, a person with a confirmed infection with a contagious disease or a person in need of medical assistance and a stateless person. In any case, minors are inherently considered a vulnerable category of persons and special attention is paid to them. The mentioned vulnerabilities are not exclusive and other categories of persons who need special care or special assistance that go beyond basic migrant care can also be included. The procedures for vulnerability assessment are not specified as such, since the aim is to ensure the personal integrity and care case-by-case, meaning dealing with each case on its own merits. No statistical data concerning applicants for temporary protection and TP beneficiaries was collected by the General Police Directorate and provided to PIC in this regard. However, as stated by the Ministry of the Interior, vulnerability assessment is in fact not carried out as part of the application process for temporary

⁸² The Government's website with information on human trafficking is available [here](#). There is also a special segment with advice for Ukrainians, warning them of the risk of trafficking in human beings as a result of the war in Ukraine. The website also links to a video with concrete advice for Ukrainians entering the EU and seeking protection.

⁸³ Information provided by the UOIM, January 2025.

⁸⁴ Article 3 ZZZRO.

⁸⁵ Information provided by the General Police Directorate, January 2025.

protection, as the competent authority for identifying vulnerabilities in the context of ensuring the rights and adequate care of applicants for temporary protection is the UOIM.⁸⁶

Further, as described by the UOIM,⁸⁷ The procedure for assessing the vulnerability of applicants for temporary protection and persons granted temporary protection is carried out by the UOIM as well as other institutions with which the Office cooperates. The first point of contact is the police station, which carries out the registration process and can determine the vulnerability of the person within the procedures. Subsequently, an introductory personal interview is conducted with persons housed in accommodation centres and other accommodations, where a social worker can detect potential vulnerabilities. For all vulnerabilities related to physical and mental health, persons are referred to doctors and psychologists or other specialists, if necessary. Persons residing at private addresses are also referred to the competent Social Work Centre, particularly in cases involving marital disputes and informal separations. No statistical data of such persons has been provided for 2024.

It is also worth mentioning that in 2024 the majority of people fleeing Ukraine and applying for temporary protection in Slovenia continued to be women with children. A total of 1,899 individuals applied for temporary protection in the Republic of Slovenia, of whom 1,006 were women - a group particularly vulnerable to potential abuse. It should also be noted that this total includes 509 minors, 15 of whom were unaccompanied.⁸⁸

Therefore, effective informing, systematic vulnerability assessment and an accessible and effective system of assistance that would prevent them from becoming victims of various forms of abuse is necessary.

In practice, there has been a difference between persons residing in accommodation centres and those in private accommodations, as the former can turn to social workers who are available in the centres and who then liaise with the competent authorities or organisations.

See also elements provided under [Information provision and access to NGOs](#).

Unaccompanied minors

The procedure for treating unaccompanied minors, as one of the categories of vulnerable persons, is regulated in Article 22 of the ZZZRO, which provides that an unaccompanied minor shall be appointed a legal statutory representative prior to the initiation of a procedure for obtaining temporary protection. In a procedure involving an unaccompanied minor, the competent authority shall take into consideration the minor's opinion, in accordance with their age and degree of maturity. Applications for temporary protection lodged by unaccompanied minors shall be examined as a matter of priority.

Further, Article 41 specifies that a minor person shall be appointed a guardian in accordance with the regulations governing guardianship by a Social Work Centre. During the period of temporary protection, unaccompanied minors shall normally be placed:

- ❖ with adult relatives;
- ❖ with a foster family;
- ❖ in accommodation centres or other lodging facilities suitable for minors;
- ❖ with a person who looked after the child upon arrival in the Republic of Slovenia.

The Social Work Centre with territorial jurisdiction shall be the centre located in the area where the unaccompanied minor is accommodated. When accommodating an unaccompanied minor, the competent Social Work Centre shall take into consideration the minor's opinion, in accordance with their age and degree of maturity.⁸⁹

⁸⁶ Information provided by the Ministry of the Interior, April 2025.

⁸⁷ Information provided by the UOIM, January 2025.

⁸⁸ Official statistics provided by the Ministry of the Interior, April 2025.

⁸⁹ Article 41(3) ZZZRO.

At the end of 2023, the Decree on providing appropriate accommodation, care and treatment of unaccompanied minors was adopted.⁹⁰ The Decree stipulated that accommodation, care and treatment of unaccompanied minors shall commence no later than 1 February 2024. However, in January 2024, an amendment to the Decree was adopted, which postponed the date of its implementation to 1 April 2024. The Decree regulates the accommodation, care and treatment of children who are on the territory of the Republic of Slovenia without parents or legal representatives, as they represent the most vulnerable group of foreigners. After several years of efforts to systematically regulate the area, the UOIM began implementing accommodation of unaccompanied minors in accordance with the Decree on 1 April 2024. In 2024, four unaccompanied minors with temporary protection were accommodated in the accommodation for unaccompanied minors in Postojna, all without additional vulnerabilities.⁹¹

In the accommodation for unaccompanied minors Postojna, 2 forms of accommodation with 24-hour care were provided in 2024: a reception centre and accommodation units. The first accommodation refers to reception rooms, where minors undergo a preventive medical examination and receive the first, basic information about staying in the said accommodation. Each child is assigned a professional worker who is responsible for monitoring their situation. The professional worker, together with the child, legal representative and other participating stakeholders, prepares an individual care and treatment plan. Throughout the treatment of children, all stakeholders follow the principle of the best interests of the child. When preparing an individual plan, the child's wishes and needs are considered, and goals are set, which are defined as short-term, medium-term and long-term. Special needs or vulnerabilities can also be identified and, in such case, the unaccompanied minor is provided with appropriate treatment (mental health care). The individual plan is updated throughout their stay at the accommodation in Postojna in accordance with the minor's needs and changing circumstances. The individual plan includes: all relevant information regarding the provision of professional support, care planning, health care, etc.⁹²

Before the preparation of the individual plan begins, the professional worker informs the unaccompanied minor of their rights and obligations. The information is adapted to the child's age and development and is provided with the help of an interpreter. Support is also provided within the framework of the project 'Psychosocial support and leisure activities for unaccompanied minors' (which is partially financed with AMIF funds). The project is implemented by Slovene Philanthropy, which implements leisure and educational activities in the accommodation in Postojna during the week, with the aim to promote the child's personal development, develop their potential and help with integration into both the local environment and Slovenian society.⁹³

Persons suffering from mental health problems

Concerning the needs of applicants for temporary protection and TP beneficiaries suffering from mental health problems, including torture survivors and other traumatised persons, the UOIM explained that in 2024 support for individuals experiencing mental health difficulties was provided through regular healthcare services —by psychiatrists— as well as through workshops conducted in accommodation centres. The aforementioned Institute Emma, as part of the UNHCR-funded project for vulnerable persons in the republic of Slovenia in need of temporary protection, provided psychosocial counselling and activities aimed at preventing and responding to gender-based violence. As part of the programme, individual and group counselling and workshops on awareness-raising and prevention of violence and child protection were carried out at all UOIM locations. In 2024, one psychological treatment was carried out in the accommodation centre in Postojna (January 2024).⁹⁴

⁹⁰ Official Gazette of the Republic of Slovenia, No. 106/23 and 8/24.

⁹¹ Information provided by the UOIM, January 2025.

⁹² *Ibid.*

⁹³ *Ibid.*

⁹⁴ *Ibid.*

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?
Same as duration of the temporary protection, i.e., initially one year and then as extended.
2. How many residence permits were issued to beneficiaries from the activation of the Temporary Protection Directive until 31 December 2024? 11,147 (1,810 in 2024)

A person enjoying temporary protection is issued an identity card by the competent administrative unit that also serves as a permit for temporary residence in the Republic of Slovenia and which is valid for the period of the temporary protection.⁹⁵ The decision/identity card must be issued within one month at the latest from the day of receiving a complete application for initiating the procedure in accordance with the Article 222, paragraph 1, of the General Administrative Procedure Act.

The duration of temporary residence permits is the same as that of temporary protection, i.e., initially one year and then as extended.⁹⁶ The permit is automatically prolonged, and beneficiaries are issued new identity cards by the administrative units ex officio.⁹⁷

Regarding difficulties see [Registration under temporary protection](#).

The residence permit granted to temporary protection beneficiaries is a *temporary* residence permit. In general, in accordance with the Foreigners Act, after five years of uninterrupted legal stay in Slovenia on the basis of a temporary residence permit, foreigners may obtain a permanent residence permit. However, the law provides that the period of residence of a foreigner in the Republic of Slovenia as a person with temporary protection cannot be counted towards the required five-year period for issuing a permanent residence permit, which is important for the persons that would decide to stay in Slovenia on a different basis (such as, e.g., single residence permit and work permit) after temporary protection ceases and would plan on eventually obtaining permanent residence permit.⁹⁸

A person who decides to renounce temporary protection because they wish to return to Ukraine or move to another country must unequivocally notify, in any way, including by e-mail, the competent administrative unit which granted them temporary protection. If a person has already been issued the abovementioned identity card, they must return it to the administrative unit that issued it (which can also be done by post). The administrative unit issues a decision on termination of temporary protection, which also specifies the deadline by which the person must leave the country.⁹⁹ As explained by the Ministry of the Interior,¹⁰⁰ in accordance with the guidelines of the European Commission a person already enjoying temporary protection in one of the member states has the right to travel to another member state for 90 days in a 180-day period, however if such a person moves to another member state (in this case to Slovenia), where they receive a second temporary protection residence permit, the member state that issued the

⁹⁵ Article 42(2) ZZZRO.

⁹⁶ Article 42(3) ZZZRO.

⁹⁷ Government of the Republic of Slovenia, *Podaljšanje začasne zaščite za razseljene osebe iz Ukrajine še za eno leto*, 19 January 2024, available in Slovenian [here](#).

⁹⁸ Article 52(1) Foreigners Act.

⁹⁹ The official Government website: Republic of Slovenia, *Support for Ukrainian Nationals in Slovenia*, available [here](#).

¹⁰⁰ Information provided by the Ministry of the Interior, April 2025.

first temporary protection residence permit must revoke it, and the rights derived from temporary protection in said member state cease.

The Republic of Slovenia is the only Member State of the European Union that has so far not participated in the European registration platform, as it did not have an appropriate legal basis for the exchange of personal data. This lack of participation has had negative consequences for Slovenia, particularly in terms of its ability to monitor potential cases of individuals holding temporary protection statuses in multiple Member States simultaneously —an issue that also carries financial implications related to the possible duplication of rights granted under temporary protection.¹⁰¹ However, the recently adopted ZZZRO-1 now provides legal basis for the competent ministry to exchange personal data of persons granted temporary protection with other Member States of the European Union, the European Commission and the Schengen Associated States, thus finally ensuring the effective enjoyment of the rights of persons under temporary protection in all Member States, while preventing abuses and the possibility of temporary protection statuses in several Member States at the same time.¹⁰²

So far PIC has not detected any cases where a person that has renounced temporary protection in Slovenia and moved to another member state or returned to Ukraine would be prevented from applying for temporary protection again upon returning to Slovenia.

However, a separate issue emerged in 2024, when a case involving the withdrawal of temporary protection due to violations of public order revealed that the provision in the first indent of the third paragraph of Article 6 of the ZZZRO is highly problematic (the Article is dealing with the cessation and withdrawal of temporary protection). PIC considers this provision particularly contentious, as the withdrawal of temporary protection status is, in its view, a disproportionate response to public order violations. In the case observed by PIC, the individual concerned was residing in an accommodation centre and had been repeatedly dealt with by the police for violent and disruptive behaviour. As a result, the staff at the accommodation centre reported the matter to the competent administrative unit, which initiated the procedure for withdrawal of temporary protection. Several stakeholder consultations were held to explore alternative solutions. These discussions revealed that the legislation is also deficient in that it does not provide for specific measures to address public order violations in the sense of house rule violations in accommodation centres for persons with temporary protection. In contrast, the legal framework for international protection includes a system of escalating measures: following a first serious breach of house rules, a written warning is issued; if the person repeats any serious breach, relocation to another facility may follow; and a further repetition can lead to termination of accommodation in state-provided facilities.¹⁰³ Since no such measures are foreseen for individuals under temporary protection, and given that the individual in question posed a safety risk to others in the centre, staff saw no viable option other than to notify the administrative unit. As discussed during joint stakeholder meetings (in which PIC participated), this step was taken in the absence of alternative legal mechanisms. This gap has been addressed in the new ZZZRO-1, which now includes provisions governing house rule violations, along with a range of escalating measures —up to and including termination of accommodation and reimbursement for damages.¹⁰⁴

2. Access to asylum and other legal statuses

Persons enjoying temporary protection may seek asylum during the period of temporary protection or after the termination thereof. In case the examination of an asylum application is not processed before the end of temporary protection, it shall be completed after the protection ends. Until a final decision on the asylum application is reached, such persons are subject to the regulations governing asylum.¹⁰⁵

¹⁰¹ Government of the Republic of Slovenia. (2024). *Predlog Zakona o začasni zaščiti razseljenih oseb – prva obravnava* (EVA 2022-1711-0029), p. 89, available [here](#).

¹⁰² Article 70 ZZZRO-1.

¹⁰³ Article 96 IPA.

¹⁰⁴ Article 33 ZZZRO-1.

¹⁰⁵ Article 8(1)-(2) ZZZRO.

While beneficiaries of temporary protection who apply for international protection retain their rights under temporary protection until a positive decision is issued on their asylum application,¹⁰⁶ this applies only if they have not renounced their temporary protection status at the time of applying. In practice, PIC observed a few cases in 2024 in which individuals renounced their temporary protection status in the course of initiating an application for international protection. According to the individuals concerned, it was not clearly communicated during the procedure with the Police that renunciation of temporary protection was not a prerequisite for lodging an asylum application. In these cases, the Police reportedly forwarded a statement to the administrative unit indicating that the person wished to renounce their temporary protection status in order to apply for international protection, without providing adequate information on the legal consequences, namely, the loss of rights associated with temporary protection. In a few other cases, individuals reported to PIC that the Police refused to process their asylum application unless they agreed to sign a statement explicitly declaring their intent to revoke temporary protection. PIC raised this issue with the Ministry of the Interior, which responded that it was not aware of such practices and clarified that such conduct is not in accordance with the applicable legal framework, which allows individuals with temporary protection to apply for asylum without first renouncing their status.¹⁰⁷

Being able to apply for asylum is not conditioned to whether a person eligible to temporary protection has first started the registration process for temporary protection and the asylum application is examined the same as other applications in accordance with the International Protection Act.

However, in several cases reported to PIC, the Police immediately directed individuals to apply either for temporary protection or for international protection based on their own assessment of the individual's presumed eligibility, despite not being the competent authority for determining eligibility for either form of protection. This practice raises concerns regarding potential interference with the applicant's right to make an informed choice, as well as with the procedural safeguards provided under the applicable legal framework.

In 2024, 123 Ukrainian citizens applied for international protection. It is also worth noting that 93 individuals who already held temporary protection submitted applications for international protection.¹⁰⁸

Another issue in 2024 was the lack of alternative legal statuses, beyond asylum, that individuals with temporary protection (TP) could access in the country. Namely, the law (ZZZRO) does not provide for a transition from TP status to other statuses that would enable TP beneficiaries to change their status to one regulated under the Foreigners Act, such as a single permit to reside and work, a single permit for self-employment, or a temporary residence permit for study purposes. The Foreigners Act stipulates that the first residence permit for temporary stay in Slovenia must be obtained before entering the country, with applications submitted to a diplomatic mission or consular post of the Republic of Slovenia or to the competent authority in Slovenia.¹⁰⁹ As long as the person's temporary protection status remains in effect, as explained by the Ministry of the Interior,¹¹⁰ transitioning from TP status to a residence permit under the Foreigners Act would thus require the individual to forfeit their temporary protection, leave the country within a specified period for voluntary departure, and then obtain the first single residence and work permit before entering the country. Doing so would also mean termination of their employment. Therefore, if a TP holder would try to apply for a permit under the Foreigners Act while still under TP status and while on the territory of Slovenia, the administrative unit would be unable to process the application, as Article 3, paragraph 5, of the Foreigners Act explicitly states that the Act does not apply to persons who have been granted temporary protection in Slovenia. Persons fleeing Ukraine had, as any other foreign national according to the Foreigners Act, the option to begin the procedure of obtaining a single permit before

¹⁰⁶ Information provided by the Ministry of the Interior, February 2024.

¹⁰⁷ Explanation by the Ministry of the Interior, June 2024.

¹⁰⁸ Official statistics provided by the Ministry of the Interior, April 2025.

¹⁰⁹ Article 34(1)-(3) Foreigners Act.

¹¹⁰ Information provided by the Ministry of the Interior, December 2023.

entering the country, rather than applying for temporary protection. However, for the majority this was not a viable option in practice.¹¹¹

B. Family reunification

Article 36 of the ZZZRO, which deals with the right to family reunification, provides that the right to temporary protection shall also be enjoyed by members of the immediate family of a person granted temporary protection. The following are deemed as immediate family members under the Act:

- ❖ a spouse or a person who had lived with the person who was granted temporary protection before their arrival in the Republic of Slovenia, for at least one year, in a domestic community that is equal in legal consequences to a marriage pursuant to the Family Code;¹¹²
- ❖ the children of the person granted temporary protection, as long as the person is obliged to support them;¹¹³
- ❖ stepchildren if they support their stepfather or stepmother, and a stepmother or stepfather if they support their stepchildren;¹¹⁴
- ❖ grandchildren and nephews of the person granted temporary protection, in so far as that person is supporting the grandchildren or nephews who are without parents;
- ❖ other close relatives of the person granted temporary protection, if they had lived together as a family before their arrival in the Republic of Slovenia and were supported by the person who has obtained temporary protection.

The ZZZRO therefore does provide ground for family reunification, however further regulation of the subject, i.e., Article 23 of the Decree on the methods for ensuring the rights of persons enjoying temporary protection stipulates that in the process of exercising the right to family reunification, provisions of the Rules on the procedure concerning the transfer of persons enjoying temporary protection shall be applied *mutatis mutandis*.¹¹⁵

In accordance with the Rules, which regulate the procedure of transferring a person with temporary protection from one EUMS to another as provided with provision of the Article 26 of Temporary Protection Directive, family reunification can therefore be applied only through the system of relocation, which begins on the basis of a case-by-case agreement between Slovenia and another EUMS. In the process of transfer from another Member State to Slovenia, the Ministry, based on data provided by the competent authority of the other Member State, determines whether a person enjoying temporary protection in another Member State has any of the reasons for ineligibility to temporary protection in accordance with Article 5 of the ZZZRO (i.e., there are reasonable grounds for suspecting that the person has committed a criminal offence against humanity and international law as determined by the Criminal Code; has committed a serious non-political criminal offence elsewhere than in the Republic of Slovenia before they were admitted to the country as an applicant for temporary protection; has committed a criminal offence contrary to the purposes and principles of the United Nations and other binding international treaties implementing these purposes and principles; poses a threat to the constitutional order of the Republic of Slovenia or has been convicted by final decision of a criminal offence in the Republic of Slovenia and imposed an unsuspended sentence of imprisonment longer than one year and whose conviction has not been expunged), and thus cannot obtain temporary protection in Slovenia.¹¹⁶

¹¹¹ The newly adopted ZZZRO-1 addresses this issue by introducing a legal basis for the transition from temporary protection to other legal statuses, such as those governed by the Foreigners Act (Article 19(10)).

¹¹² Family Code, Official Gazette of the Republic of Slovenia, no. 15/17 and subsequent amendments.

¹¹³ The notion of 'obligation to support' in family relations is regulated in the Family Code, which stipulates that parents are obliged to support their minor children, i.e., until they reach the age of 18, or until the age of 26, as long as they are enrolled into school as regular students.

¹¹⁴ *Ibid.*

¹¹⁵ Rules on the procedure concerning transfer of persons enjoying temporary protection, Official Gazette of RS, No. 110/05.

¹¹⁶ Articles 2(1) and 7(1) Rules on the procedure concerning transfer of persons enjoying temporary protection.

The understanding of the author is that in this sense the TPD is transposed through the possibility provided for by Article 15 (2) of the TPD, which allows family reunification in cases where the separate family members enjoy temporary protection in different Member States.

However, as the general system of relocation has not been put in place thus far, the right to family reunification for temporary protection beneficiaries is *de facto* not exercised and they cannot benefit from the rules on family reunification applicable to beneficiaries of international protection (see [General Report – Family Reunification](#)). Furthermore, no procedure has been put in place for persons to request family reunification through the TPD.

C. Movement and mobility

Restriction of movement of applicants for temporary protection may only be applied to those whose identity is not known or if there is doubt as to their identity. In such case, applicants may be required to stay, for a limited period of time, within an accommodation centre. Such restriction of movement shall be decided on by the Ministry by a procedural decision. The restriction may last for as long as the reasons exist, but for no longer than one month. If the reasons for the restriction persist thereafter, the restriction may be extended by another month. An appeal may be filed against a procedural decision restricting an applicant's movement before the Administrative Court of the Republic of Slovenia within three days of its service; the court shall decide on the case within three days of a preliminary oral hearing.¹¹⁷

Other than the mentioned restriction, beneficiaries of temporary protection have freedom of movement within the State and are not subjected to territorial restrictions.

Beneficiaries of temporary protection also have freedom of movement to other EU Member States once they are registered.

In 2024, no issues were detected regarding re-entry into the country for beneficiaries of temporary protection who chose to temporarily return to Ukraine. There is no national policy defining the period of authorised absence, without suspensive effect on the TP-related status and rights, therefore such effect is considered on a case-by-case basis when prolonged absence is detected by the competent authorities (for example by UOIM with respect to financial aid). As observed by PIC in practice, one of the practical issues in cases of absence can also be that the decision on temporary protection needs to be served to the applicant directly once issued and there is a time limit of 15 days from the date of service in order to file an appeal against the decision. Persons may also be asked to supplement the application and if they do not send the supplement in time, the decision is made on the basis of the evidence received.

D. Housing

Indicators: Housing

- | | |
|---|---------------|
| 1. For how long are temporary protection beneficiaries entitled to stay in reception centres? | Unlimited |
| 2. Number of beneficiaries staying in State provided accommodation as of 12/2024 | 547 |
| 3. Number of beneficiaries staying in private accommodation as of 12/2024 | Not available |

In accordance with the ZZZRO, the Government Office for the Support and Integration of Migrants (*Urad za oskrbo in integracijo migrantov*, UOIM) is responsible for ensuring that persons with temporary protection are properly accommodated. The UOIM is obliged to organise the transfer of applicants to the nearest reception centre, where identification, collection of information relevant to the granting of temporary protection and a medical examination take place. Applicants may be placed in accommodation centres pending the final decision on their application. The centres are established by the Government

¹¹⁷ Article 21 ZZZRO.

and managed by the UOIM.¹¹⁸ Further, the Decree on the methods for ensuring the rights of persons enjoying temporary protection provides in Article 2 that until the final decision on an application for temporary protection is made, the applicant for temporary protection may stay in accommodation centres where they are provided with adequate food. The UOIM organises transport of the applicant for temporary protection to the nearest reception centre, but if they have their own transportation or are provided with transportation in another way, the applicant for temporary protection can take themselves to the nearest reception centre.

Moreover, the law also provides that persons have the right to be provided accommodation and meals at accommodation centres after being granted temporary protection.¹¹⁹

In line with the Decree, vulnerable groups of persons as referred to in the act governing temporary protection are accommodated in accommodation centres separately from other persons with temporary protection, where their special needs are taken into account based on an individual assessment.¹²⁰

In practice, the reception of applicants for temporary protection is carried out in the Asylum Home Branch Facility in **Logatec**, which serves also as an accommodation centre for asylum seekers, applicants for temporary protection and temporary protection holders, with an accommodation capacity of around 400 persons.¹²¹ However, later on, usually only after receiving temporary protection, they are accommodated in other available accommodation centres or other State-provided accommodations. As described in the Human Rights Ombudsman of the Republic of Slovenia's annual report for 2022, in the accommodation centre in **Logatec**, all categories of Ukrainian citizens - both families and single women as well as single men - are accommodated, while among the seekers of international protection, only families, couples, single women and unaccompanied minors are accommodated in the centre. As reported, the persons are accommodated in three buildings and in living containers, in which up to six single persons or up to eight family members are accommodated.¹²² These issues were not mentioned in the Ombudsman's report for 2023. In 2024, as observed by PIC, UOIM made an effort to relocate applicants for temporary protection and TP holders from the accommodation centre in Logatec to other State-provided accommodations that are designated specifically for persons with temporary protection as soon as possible.

Based on PIC's observation individuals can freely move on the premises of the centre and are allowed to leave the premises after informing the social workers. Where they are accommodated in **Logatec**, in buildings or in containers, and where and when they are moved next is decided by the social workers based on the individual circumstances (e.g., family, unaccompanied minor, single woman, other detected vulnerabilities etc.) as well as depending on the status of the person (temporary or international protection) and availability. Special attention is afforded to individuals assessed as vulnerable, for example women with children are put in separate rooms from men and the containers host mostly single men.

Applicants and beneficiaries of temporary protection are also housed in the accommodation centres in **Debeli Rtič** and in **Postojna**.¹²³ Additionally, due to the lack of capacity in accommodation centres, the UOIM also began accommodating persons into student dormitories (e.g., in **Kranj**, **Nova Gorica**, **Radenci**) and other suitable state-owned and other facilities (such as apartments of the Ministry of Defence, apartments of the Public Housing Fund, Integration Houses, accommodations obtained through a public call, that met the necessary conditions, etc.). In the future, the UOIM is also planning to use the facilities in **Jelšane**, **Gornja Radgona** and **Velenje**.¹²⁴ Orphans, aged one to seven years, that were

¹¹⁸ Article 17(1)-(3) ZZZRO.

¹¹⁹ Article 25(1) ZZZRO.

¹²⁰ Article 4 Decree on the methods for ensuring rights of persons enjoying temporary protection.

¹²¹ Official statistics provided by the UOIM, March 2024.

¹²² Human Rights Ombudsman of the Republic of Slovenia, *The 28th Annual Report of the Human Rights Ombudsman of the Republic of Slovenia for 2022*, available in Slovenian [here](#).

¹²³ Republic of Slovenia, *Z nastanitvenim centrom v Postojni pridobili 120 novih namestitev*, 8 July 2022, available in Slovenian [here](#).

¹²⁴ Republic of Slovenia, *Support for Ukrainian Nationals in Slovenia*, available [here](#).

relocated from the Luhansk orphanage in Ukraine in 2022, were placed in the village of Slavina near Postojna in a house that is owned by the municipality of Postojna.¹²⁵ In 2023, Deputy Ombudsman visited the orphans accommodated in the Postojna student dormitory and in the accommodation facility in Slavina to examine the social and living conditions and assessed that the children have adequate care.¹²⁶ At the beginning of 2024, there were discussions about the Ukrainian authorities requesting the return of the orphans, who have been housed in Slavina since May 2022, to Ukraine. The coordinator overseeing their care in Slovenia raised concerns, emphasising that relocating the children to an unstable environment would not be in their best interest. This has not happened so far and the orphans have remained in Slovenia (except for one of the children returning to Ukraine with their adoptive mother and, as reported, two sisters that are also expected to leave Slavina and are, according to informal information, returning to Ukraine to their mother, who has regained custody of them). Moreover, in August 2024 the Government approved the decision to extend the project for another six months, until 4 March 2025.¹²⁷

With regard to housing, applicants for temporary protection and temporary protection holders are entitled to accommodation and meals in accommodation centres and, after being granted TP, a person is also entitled to monthly allowance (see [Social Welfare](#)) or, if they do not reside in accommodation centres, financial assistance for private accommodation, that are granted only to those beneficiaries that are not receiving any income or cash benefits and who are unable to rely on a person who is obligated to and capable of supporting them in accordance with the regulations of the Republic of Slovenia.¹²⁸

So far, applicants and TP holders have been able to stay in accommodation centres free of charge (and are provided food), regardless of whether they have their own means of subsistence, or another source of livelihood and any income only affects their right to receive the allowance or financial assistance for private accommodation.

In comparison with the International Protection Act, which clearly provides that asylum seekers have the right to the following material reception conditions: accommodation in the Asylum Home or its branch facilities; material support (food, clothing, footwear and hygiene supplies); emergency medical care (and full medical care in case of children); access to education; access to the labour market; humanitarian aid and an allowance,¹²⁹ material reception conditions as such are not explicitly defined for applicants for temporary protection and TP beneficiaries by law. Thus, the law also does not specify any procedure for such rights to be reduced or withdrawn.

Nonetheless, PIC has observed that material support has been available to applicants for temporary protection and to TP holders, accommodated in accommodation centres, considering their needs, despite TP holders receiving an allowance that should supposedly cover such costs.

There is also no specific provision on how long beneficiaries of temporary protection are entitled to stay in reception centres. In general, they stay in the reception/accommodation centre in **Logatec** for a shorter period and are then moved to other accommodation centres and state facilities if they do not decide to reside in a private accommodation. Though, if a person is absent from the reception/accommodation centre for a longer period of time (for example in case of a visit to Ukraine), it is not guaranteed that they will be able to return to the same accommodation as previously, as this depends on free capacities.¹³⁰

In 2024, there were at least 600 available places in State-provided accommodations for applicants for temporary protection and beneficiaries of temporary protection in total and as of 31 December 2024, 547 TP applicants and holders were residing in reception/accommodation centres and other facilities, as

¹²⁵ Republic of Slovenia, *Otroci iz ukrajinske sirotišnice Lugansk so prispeli v Slavino pri Postojni*, 3 May 2022, available in Slovenian [here](#).

¹²⁶ MMC RTV Slovenija (G.K.), 'Varuh: Za ukrajinske sirote je v Postojni dobro poskrbljeno', 16 June 2023, available in Slovenian [here](#).

¹²⁷ N1, 'V Sloveniji še 12 sirot iz Ukrajine: nekaj naj bi se jih domov vrnilo septembra', 28 August 2024, available in Slovenian [here](#).

¹²⁸ Article 23 and Article 35(1) ZZZRO.

¹²⁹ Article 78(1) and 79 IPA.

¹³⁰ Information provided by the UOIM, February 2023.

follows: 212 persons in accommodation centres (Logatec, Debeli rtič, Postojna), 3 in Integration House Maribor, 39 in apartments of the Public Housing Funds and 293 in other facilities (such as dormitories, facilities provided by the Ministries and capacities acquired based on a public call).¹³¹

Applicants for temporary protection and temporary protection holders can also reside in private accommodation without requesting the authorisation to do so from the competent authority as the law on temporary protection does not provide for such requirement as is needed for applicants for international protection in line with the International Protection Act.¹³² Applicants can secure private accommodation by themselves or with help from non-governmental and humanitarian organisations (Slovene Philanthropy, Red Cross/Caritas and some others), as well as with assistance of some local communities. Since the beginning of the war, applications from private individuals as well as companies offering accommodation to persons fleeing the war in Ukraine have also been collected at the UOIM, which then matched them with applicants for temporary protection and temporary protection holders looking for private accommodation, considering any specific needs. However, in 2024 the UOIM no longer actively assisted in finding private housing. According to the UOIM, they did receive some private accommodation offers, which were forwarded to individuals, who were also informed about the rights of tenants in Slovenia. The persons were invited to view the apartments and speak with the landlords. In 2024, the UOIM did not receive any free offers for accommodation.¹³³

As the offered private accommodations had not been personally checked by the UOIM and the only safeguard has been largely based solely on a preliminary assessment by the employees at the UOIM (conducted via telephone or e-mail), this poses a certain risk given the vulnerability of the refugee population due to the possibility of unsafe or exploitative living conditions. Another issue that gradually became apparent, as observed by PIC, is that the initial wave of public interest in hosting Ukrainian refugees has significantly declined, making it more challenging for beneficiaries, particularly those seeking long-term private accommodation of a year or more, to secure appropriate private housing. In cases of free of charge hosting by private individuals, no financial compensation or financial support for private households housing persons fleeing Ukraine has been introduced by the State. Financial aid is only provided to TP beneficiaries. However, financial assistance for private accommodation, which is granted for paying rent and/or utility costs (when there is a signed rental agreement or agreement on the use of the real estate property) can also be submitted directly to the account of the landlord with a written consent by both, the landlord and the TP beneficiary as a tenant. In this respect, some issues with landlords were also reported to PIC regarding temporary protection beneficiaries not being able to immediately pay the rent, as they were waiting for the financial assistance for private accommodation that is provided by the UOIM (sometimes past the time limit for issuing a decision on granting financial aid due to limited capacities for processing a large number of applications). Many temporary protection beneficiaries have also found accommodation with their friends or relatives. Slovenia did not collect statistics on the use of accommodation in private households in 2024.

So far PIC did not detect any issues with temporary protection beneficiaries being able to access reception conditions provided by the State. However, in 2024 a shortage of affordable private accommodations, meeting the specific needs of vulnerable groups, their temporary nature and the risk of exploitation in private accommodation continued to be an issue. No special safeguards have been put in place in relation to private housing to prevent risks such as inappropriate conditions or exploitation risk.¹³⁴

The Slovenian Ombudsman visited the accommodation centre in Logatec in 2022 due to reports of overcrowding and poor living conditions. During the visit, asylum seekers, TP holders and people waiting to lodge an application were accommodated in rooms and containers. Regarding the rooms in the built facilities, the Ombudsman noted that they are in line with the accommodation standards set in EASO/EUAA guidelines. People had a lot of outdoor activities; the rooms could be locked and the whole centre was properly cleaned. However, the Ombudsman concluded that accommodation conditions in the

¹³¹ Official statistics provided by the UOIM, January 2025.

¹³² Article 83(1) IPA.

¹³³ Information provided by the UOIM, January 2025.

¹³⁴ Observation by PIC.

containers do not reach the minimal standards set out by the EASO/EUAA guidelines when overcrowded. The area of the container is 14.4 m² (6 x 2.4 m²) and up to six single persons or up to eight family members are accommodated in one container. If more than three people live in the container, they are therefore guaranteed less than 4 m² of personal space. The Ombudsman also noted that the situation is especially concerning regarding the right to personal dignity, the right to privacy and the right to personal security. In the opinion of the Ombudsman, the conditions to a certain extent contributed to the high absconding rate. Therefore, the conditions also violated the right to asylum enshrined in Article 18 of the Charter. The Ombudsman concluded that the conditions were the consequence of lack of capacity. He recommended that additional capacity be guaranteed together with additional staff. The Ombudsman also recommended that the containers should not be used.¹³⁵

In response to the Human Rights Ombudsman's 2022 recommendations concerning accommodation conditions at the Asylum Centre and its branch in Logatec, the UOIM provided a detailed explanation on the ongoing, intensive efforts to secure new accommodation capacities for the persons declaring the intention to file an application for international protection as well as for applicants for international protection. Efforts included outreach to state bodies, reviewing real estate offers from private and corporate sources, and identifying potential new sites through site visits. However, according to the UOIM challenges persist, particularly in securing local community support, which, although not legally required, is seen as essential for ensuring the effective exercise of rights and integration of accommodated persons. Despite several identified locations, municipal support has not yet been obtained. The UOIM also explored availability in dormitories and hostels in and around Ljubljana but found them fully occupied or pre-booked. In addition, a public call for the rental of suitable facilities was issued in September 2022, followed by a broader call for offers in early 2023, both of which yielded limited results. Some ministries also indicated potential capacities that could be allocated for migrants. Visits to the proposed locations or plots of land are still being carried out.¹³⁶

The Ombudsman thus considered that the primary objective, namely, to draw attention to and criticize the overcrowding conditions at the Asylum Centre, had been achieved. In 2023 and 2024, the Ombudsman did not receive any new initiatives or warnings that would again raise concerns about overcrowding at the Asylum Centre. However, the Ombudsman did present his findings regarding the general living conditions at the Centre, particularly in relation to overcrowding, in a specific court case, in which he participated as *amicus curiae*.¹³⁷

Additionally, in 2024, the Ombudsman handled an initiative with claims of psychological abuse and degrading treatment of Ukrainian refugees accommodated in a student dormitory, including alleged inspections of their rooms and personal belongings. Based on these claims, the Ombudsman visited the student dormitory, where persons from Ukraine with temporary protection status are accommodated, and reviewed the room inspections. The Ombudsman issued an opinion to the UOIM and the student dormitory, stating that the search of rooms where persons with temporary protection were accommodated unlawfully infringed on their privacy, and called for a response. The case remains pending.¹³⁸

E. Employment and education

1. Access to the labour market

Persons enjoying temporary protection enjoy the right to work to the same degree as refugees, in accordance with the regulations governing the employment and work of foreigners (see [General Report – Access to the labour market](#)). Persons enjoying temporary protection may participate in training programmes or enter into a traineeship in accordance with regulations. Costs incurred as a result of exercising these rights are borne by the employer. Persons enjoying temporary protection may exercise

¹³⁵ Human Rights Ombudsman of the Republic of Slovenia, *The 28th Annual Report of the Human Rights Ombudsman of the Republic of Slovenia for 2022*, available in Slovenian [here](#), 225-226.

¹³⁶ Information provided by the Human Rights Ombudsman, January 2025.

¹³⁷ Ibid.

¹³⁸ Ibid.

said rights only during the period of temporary protection.¹³⁹

Displaced persons from Ukraine who have been granted temporary protection have free access to the labour market, which means that they are employed in Slovenia under the same conditions as Slovenian nationals and their employers are not required to obtain work permits in order to be able to employ them. When entering the labour market, Ukrainian nationals and other TP beneficiaries are entitled to the same range of statutory employment rights and obligations as other active job seekers and employees. It is important to point out that, because of their lack of knowledge of Slovenian language and of familiarity with the system itself and their rights under labour law and other relevant legislation, foreigners are a particularly vulnerable group in and around the labour market.

The Employment Service of the Republic of Slovenia provides foreigners with tailored career counselling and programmes to speed up their labour market integration. TP beneficiaries are encouraged to register with the Employment Service, as each unemployed person is assigned a career counsellor with whom they draw up an employment plan and plan how to take further steps to speed up their labour market integration. The Employment Service also provides assistance to the unemployed by enrolling them in active employment policy programmes which may help them acquire the necessary knowledge, skills and competences to improve their employment opportunities. Foreigners who do not speak Slovenian and have no experience with the Slovenian labour market are provided with special tailor-made programmes organised by the Employment Service. In addition to Slovenian language courses, these programmes include on-the-job trainings for beneficiaries of international and temporary protection and foreigners, as well as workshops on "Labour market integration" and "Supporting vulnerable groups in the labour market". Another benefit of registering is that the Employment Service is responsible for monitoring and verifying employers whose job vacancies have been publicly advertised.¹⁴⁰

No exemptions from qualification recognition regarding specific professions that would be specifically related to facilitated employment of persons with temporary protection have been implemented in 2024 despite serious shortage of staff in certain professions, such as healthcare workers.¹⁴¹

In 2024, on average around 454 persons with temporary protection were registered in the register of unemployed persons monthly and on average around 8 persons were registered in the register of jobseekers at the Employment Service of Slovenia (ESS), meaning they were actively seeking and were willing to take up employment.¹⁴²

2. Access to education

In accordance with the ZZZRO,¹⁴³ persons under the age of 18 enjoying temporary protection are entitled to enjoy the same rights under the same terms as citizens of the Republic of Slovenia as regards:

- ❖ admission to and completion of primary education and
- ❖ admission to and completion of short-term and secondary vocational and secondary technical and general education for the acquisition of state-approved education in public and private

¹³⁹ Article 28(1)-(4) ZZZRO.

¹⁴⁰ Republic of Slovenia, *Employment of Ukrainian nationals living in Slovenia*, available [here](#).

¹⁴¹ However, even though this is not relevant to temporary protection beneficiaries, as they already enjoy free access to the labor market, it is worth mentioning the Employment, Self-employment and Work of Foreigners Act (Official Gazette of RS, No. 91/21 and 42/23) was amended in 2023 in order to simplify employment of foreigners. With the amendment, foreign nationals who are employed in the public sector, where there is a serious shortage of suitable staff, especially in health and social services (such as health centres, nursing homes etc.), will no longer be subject to the provisions of the amended law. Therefore, foreign nationals who will be employed in the public sector do not need to be granted consent for such employment from the Employment Service of Slovenia (ESS) anymore, making the process faster, as ESS needs to determine the education, language skills and qualifications of foreign nationals before granting consent.

¹⁴² Official statistics provided by the Ministry of Labour, Family, Social Affairs and Equal Opportunities, January 2025.

¹⁴³ Article 29(1) ZZZRO.

schools financed through public sources if, upon enrolment, they are below the age of 18 and meet the admissions requirements.

The costs of education for TP beneficiaries under the age of 18 are to be covered by the ministry responsible for education, to the same degree and under the same terms as applicable to citizens of the Republic of Slovenia,¹⁴⁴ which means that their education is free of charge.

Persons enjoying temporary protection who are older than 18 years of age may participate in education as described for persons under the age of 18 under the same conditions that apply to participants in adult education, in terms of tuition fees; they may also take part in higher vocational and higher or university-level education in accordance with the regulations governing these education programmes.¹⁴⁵

The inclusion of persons enjoying temporary protection in education programs is arranged by the UOIM in cooperation with the Ministry of Education.¹⁴⁶

The National Education Institute Slovenia (ZRSŠ) has prepared Guidelines for the integration of children and adolescents with temporary protection in educational institutions,¹⁴⁷ which are intended for those working in kindergartens, primary and secondary schools and serve to support the integration and work with children and adolescents, who come from war zones and need help to integrate, and to create an inclusive environment in which children and young people learn to respect diversity.¹⁴⁸

Kindergartens are open to children from the age of 11 months until they start primary school,¹⁴⁹ however, before enrolling their child into kindergarten, parents must provide a certificate issued by a paediatrician stating that the child has been vaccinated against measles, mumps and rubella, unless there are medical reasons for not being vaccinated, otherwise the inclusion is refused.¹⁵⁰ This may represent issues to some, who did not bring the necessary documentation with them when fleeing Ukraine to be able to prove whether the child has had all the necessary vaccinations.

In Slovenia, in accordance with the Basic School Act, primary education lasts nine years and is compulsory.¹⁵¹ No information provided by the competent authority (the Ministry of Education) indicates an obligation for those attending online Ukrainian school to also attend Slovenian school and PIC did not observe any issues related to the children with temporary protection that are fulfilling their obligation to attend elementary education only through continuing to attend Ukrainian school online. The Ministry of Education has, however, explained that at the end of 2023, the Ministry forwarded to all primary and secondary schools a circular with a letter from the Ukrainian Ministry responsible for education addressed to parents and legal representatives of Ukrainian children, recommending that children attending Slovenian schools follow the Slovenian education system. Despite the war, education in Ukraine is still available as well as the option of a combined system with online education provided by the Ukrainian authorities. Students who are already enrolled in primary school education in the Republic of Slovenia are obliged by law to attend classes in all subjects according to the compulsory programme of primary school. Those students who decide for parallel education according to the Ukrainian programme are able to attend online education after daily scheduled programme of the Slovenian primary school. Schools and children's parents report that it is challenging for students to coordinate attending a Slovenian primary school and the Ukrainian distance education model simultaneously.¹⁵²

¹⁴⁴ Article 29(3) ZZZRO.

¹⁴⁵ Article 29(2) ZZZRO.

¹⁴⁶ Article 29(5) ZZZRO.

¹⁴⁷ National Education Institute Slovenia, Smernice za vključevanje otrok in mladostnikov z začasno zaščito v vzgojno-izobraževalne zavode, available [here](#).

¹⁴⁸ Information provided by the Ministry of Education, March 2024.

¹⁴⁹ Article 20(2) Kindergartens Act, Official Gazette of RS, No. 100/05 and subsequent amendments.

¹⁵⁰ Article 51.a Communicable Diseases Act, Official Gazette of RS, No. 33/06 and subsequent amendments.

¹⁵¹ Article 3 Basic School Act, Official Gazette of RS, No. 23/05.

¹⁵² Information provided by the Ministry of Education, March 2024.

In accordance with the regulations on the basic education programme, children are usually enrolled in the school located in the school district where they reside. The first days of primary school are dedicated to getting to know the school environment and learning Slovenian. Pupils benefiting from temporary protection can also take part in the extended curriculum and in the extra-curricular activities provided by the school. Moreover, pupils with temporary protection are entitled to have extra Slovenian language lessons. As the language barrier is one of the main issues, in the first year of their schooling, the emphasis is placed on language empowerment and a condensed approach to beginner Slovenian language lessons. Pupils shall also be offered various forms of support, including supplementary teaching, individual and group assistance, adaptations to teaching methods and approaches, and they are entitled to have the option of adjusting their assessment during the school year.¹⁵³

In order to enrol in elementary school and upper secondary schools (general education, vocational education, and technical education), candidates must meet the entry requirements, which together with the enrolment process, are the same as the for candidates who have previously studied abroad, *i.e.*, through a process of recognising foreign education with a view to continue their studies. Applicants must submit appropriate documentation of their studies abroad. Completion of primary school is the basic entry requirement for enrolment in the initial year of secondary school, while admission to higher secondary-school year(s) is decided by the selected secondary school after reviewing the candidate's previous certificates and comparing the subject curricula of both countries.¹⁵⁴ The selected school decides on the enrolment of a person with temporary protection who is unable to prove their previous education by submitting appropriate documents or certificates, following the guidelines of the National Education Institute Slovenia, which set out the elements of the initial interview that is to be carried out at the school as well as possible ways of assessing prior knowledge. Due to the enrolment of persons with temporary protection who apply for programmes with enrolment restrictions, additional places may be provided.¹⁵⁵

If the child beneficiary has special needs, these are addressed, and appropriate arrangements are available as for the nationals.

In comparison with beneficiaries of international protection for which it is provided in the International Protection Act that they are entitled to state scholarships,¹⁵⁶ in the act regulating temporary protection no provision determines entitlement to state scholarships for persons with temporary protection, therefore the Scholarship Act¹⁵⁷ alone applies in this regard. This act, that defines several forms of scholarships that are awarded in the Republic of Slovenia besides state scholarships, foresees in Article 12 that, in principle, a scholarship is awarded to citizens of the Republic of Slovenia, to third-country nationals who have acquired long-term resident status or to those with another relevant status under this article. As not being entitled to state scholarships represents an issue to many TP beneficiaries, there was also a public call in 2022 by the School Student Organisation of Slovenia and Slovenian Student Union for the Public Scholarship, Development, Disability and Maintenance Fund of the Republic of Slovenia to hold an extraordinary tender for pupils and students from Ukraine, the costs of which would be covered by the competent ministry,¹⁵⁸ however, there has been no change in legislation in this respect so far.

While in general tuition fees for studies according to officially recognised study programmes are charged to foreigners (citizens of non-EU countries) in accordance with the Regulations on tuition fees and accommodation in public students' dormitories for Slovene nationals without Slovene citizenship and foreigners in the Republic of Slovenia, the Regulations were amended on 31 March 2022 (in force since 23 April 2022) to include persons with temporary protection under the categories of foreigners that do not

¹⁵³ Republic of Slovenia, *Providing education to Ukrainian children living in Slovenia*, available [here](#).

¹⁵⁴ Republic of Slovenia, *Providing education to Ukrainian children living in Slovenia*, available [here](#).

¹⁵⁵ Article 17(1)–(2) and (4) Decree on the methods for ensuring rights of persons enjoying temporary protection.

¹⁵⁶ Article 101(2) International Protection Act.

¹⁵⁷ Scholarship Act, Official Gazette of RS, No. 56/13 and subsequent amendments.

¹⁵⁸ Študentska organizacija Slovenije, *Javni poziv k zagotovitvi sredstev in izvedbi izrednega razpisa za štipendije dijakom in študentom, prizadetih zaradi ukrajinske krize*, 24 March 2022, available [here](#).

need to pay tuition fees at public higher education institutions, or they pay the same amount as is determined for citizens of the Republic of Slovenia.¹⁵⁹

The right to accommodation in student dormitories for students with temporary protection is also not regulated in the ZZZRO, however, the Rules on Subsidised Student Accommodation stipulate that the subsidy for accommodation in student dormitories is also awarded to students who have the status of a person with international protection or the status of a person with temporary protection and who fulfil the general conditions set in the Rules.¹⁶⁰ To cover the cost, they can also apply for financial assistance for private accommodation.

As of 9 September 2024,¹⁶¹ a total of 155 children beneficiaries of temporary protection were enrolled in kindergartens, 900 in elementary schools; 11 in schools with adapted and special educational programmes; 2 in specialised centres for children and adolescents with emotional and behavioural problems and 153 Ukrainian students with temporary protection were enrolled in secondary schools.¹⁶² As for Ukrainian students that were enrolled in higher education, in the academic year 2024/2025 there were 289 students with Ukrainian citizenship (this data is collected based on citizenship and not based on status such as temporary protection).¹⁶³

The main obstacles detected by PIC with regard to access to education for temporary protection beneficiaries have been the language barrier, the difference in education systems in comparison to Ukraine and lack of free spaces during the year for the TP beneficiaries to be included as soon as possible.

F. Social welfare

The law provides for access to social welfare for temporary protection beneficiaries in various forms, *i.e.*, monthly allowances in the amount of 30 percent of the basic minimum monthly income for TP holders that are staying in accommodation centres.¹⁶⁴ In 2024, the monthly allowance was around EUR 139.60 until increase of the basic minimum monthly income from 1 April 2024 onwards to EUR 484.88, at which point the allowance for TP holders was increased accordingly to around EUR 145.50 per month.¹⁶⁵ Allowance is provided based on a person's signed statement that they are without their own means of subsistence.¹⁶⁶

Those who stay in places other than accommodation centres and who do not receive any income or cash benefits and who are unable to rely on a person who is obligated to and capable of supporting them in accordance with the regulations of the Republic of Slovenia can obtain two forms of financial aid, *i.e.* financial assistance (for everyday expenses) and financial assistance for private accommodation (as payment for rent and/or utility costs). Applications for financial assistance and financial assistance for private accommodation must be sent by post or submitted in person during office hours at the UOIM, using the prescribed form. The amount of financial assistance and financial assistance for private accommodation depends on the number of family members and their incomes and is calculated in relation to the basic amount of the minimum income, which is determined by the regulations governing social assistance payments. In 2024, the same as in previous years, these benefits were financed by the Government Office for the Support and Integration of Migrants (UOIM). Other potential forms of social assistance, including subsidies and reduced payments, can be claimed at local Social Work Centres,

¹⁵⁹ Article 4(1) Regulations on tuition fees and accommodation in public students' dormitories for Slovene nationals without Slovene citizenship and foreigners in the Republic of Slovenia, Official Gazette of RS, No. 77/16 and subsequent amendments.

¹⁶⁰ Article 12 (6) Rules on Subsidized Student Accommodation, Official Gazette of RS, No. 22/01 and subsequent amendments.

¹⁶¹ As explained to PIC by the Ministry of Education, data is collected on several dates and is based on the information provided by the individual institutes; information from 9 September is the most recent from 2024.

¹⁶² Official statistics provided by the Ministry of Education, May 2025.

¹⁶³ Official statistics provided by the Ministry of Higher Education, Science and Innovation, April 2025.

¹⁶⁴ Article 35(2) ZZZRO.

¹⁶⁵ The official Government website, *Denarna socialna pomoč*, available [here](#).

¹⁶⁶ Article 22(1) Decree on the methods for ensuring rights of persons enjoying temporary protection.

such as first social aid, personal social aid, child benefit, kindergarten subsidy,¹⁶⁷ parental allowance, childbirth grant, allowance for a large family, partial payment for lost income.

The amount of financial assistance is determined in relation to the basic amount of the minimum income according to the following criteria: for the first adult person or claimant 100% of the basic amount of the minimum income, 70% for every additional adult person in the family; 30% for every child under the age of 18; 100% for an unaccompanied minor and for minors staying in the Republic of Slovenia with only one parent, the financial assistance is increased by 30% of the basic amount of the minimum income.¹⁶⁸ In 2024, the basic amount of the minimum income was EUR 465.34, until it was increased to EUR 484.88 from 1 April 2024.¹⁶⁹

As for the financial assistance for private accommodation, the amount is determined according to the number of family members of the person with temporary protection, as follows: for one person 100%, for two people 130%, three people 160%, etc.¹⁷⁰ The amount was increased to EUR 484.88 (100%) from 1 April 2024 based on increase of the basic amount of minimum income. If a lower amount of rent and utility costs altogether is specified in the rental agreement, the contractual amount is considered instead of the stated amounts.¹⁷¹ The decision to grant financial assistance for private accommodation was first issued for a period of three months which was extended to six months with the amendment (in force since 3 December 2022) to the Decree on the methods for ensuring rights of persons enjoying temporary protection.¹⁷² Financial assistance is also provided for six months.¹⁷³ If beneficiaries want to continue to receive funds, they must submit a new request before the expiry of the valid decision.¹⁷⁴ In 2024 (applied as of 7 September 2024), the Decree was amended to decrease the amount of financial assistance for private accommodation after two years from the recognition of temporary protection. The amount of the monthly financial assistance for private accommodation, after two years from the recognition of temporary protection status, is thus determined at the amount of 85% of the contractual sum of rent and other costs related to the rental of the property (e.g. costs for supplied energy, heating of the apartment, communal services, operation of common parts of a residential or multi-apartment building), but no more than the following percentage of the basic amount of minimum income valid on the day of submitting the request for financial assistance for private accommodation: for one person 85%, for two people 110%, three people 135%, etc.¹⁷⁵

The main difference in access to social welfare for temporary protection beneficiaries in comparison to nationals is the competent authority for granting social assistance (UOIM for TP beneficiaries, whereas Centre for Social Work is the main authority for granting social assistance under the national social security system), however the conditions that need to be fulfilled in order to be entitled different forms are the same as for nationals, *i.e.*, as regulated with general legislation governing social assistance. There are also some differences in the percentages for financial assistance that TP beneficiaries are entitled to in comparison with financial social assistance (social assistance benefit) for the nationals. For a person enjoying temporary protection, the amount of financial assistance is determined in amounts as stated above, while financial social assistance for the nationals is determined in relation to the basic amount of the minimum income as follows: 100% for the first adult person or claimant; 57% for every additional adult person in the family; 59% for every child under the age of 18; 18% increase for each child in a single-parent family.¹⁷⁶

¹⁶⁷ Kindergarten is free of charge for TP beneficiaries who are receiving the allowance or financial assistance, while employed persons can apply for the kindergarten subsidy, as provided with Article 16(1-2) Decree on the methods for ensuring rights of persons enjoying temporary protection.

¹⁶⁸ Article 32 ZZZRO.

¹⁶⁹ The official Government website, *Denarna socialna pomoč*, available [here](#).

¹⁷⁰ Article 9(1) Decree on the methods for ensuring rights of persons enjoying temporary protection

¹⁷¹ Article 10 Decree on the methods for ensuring rights of persons enjoying temporary protection.

¹⁷² Article 5(5) Decree on the methods for ensuring rights of persons enjoying temporary protection.

¹⁷³ Article 34(2) ZZZRO.

¹⁷⁴ Article 5(4) Decree on the methods for ensuring rights of persons enjoying temporary protection.

¹⁷⁵ Article 9(2) Decree on the methods for ensuring rights of persons enjoying temporary protection.

¹⁷⁶ Article 26 Social Assistance Payments Act, Official Gazette of RS, No. 61/10 and subsequent amendments.

Other forms of social assistance, subsidies and reduced payments are claimed at the local Social Work Centre, the same as for Slovenian citizens.

Temporary protection beneficiaries are given a *temporary* residence permit. The type of residence (temporary or permanent) is important in order to obtain rights to social security; for example, dependence allowance, allowance for foreign care and help, home care assistant, funeral payment and death grant etc. are connected to permanent residence. Moreover, in case a person does not meet the conditions to be included in compulsory (health, pension and disability) insurance, *i.e.*, when they are unemployed and are therefore not registered in compulsory social security by an employer, they can only be included in insurance voluntarily (paying contributions themselves) in accordance with the Health Care and Health Insurance Act¹⁷⁷ and Pension and Disability Insurance Act¹⁷⁸ under the condition that they have a permanent residence in Slovenia.¹⁷⁹

The provision of social welfare is not specifically tied to a requirement to reside in a specific place or region.

As explained to PIC by the Ministry of Labour, Family, Social Affairs and Equal Opportunities, the right to family benefits and allowances is based on permanent or temporary residence in the Republic of Slovenia and actual residence in the Republic of Slovenia, therefore the statuses of beneficiaries (legal basis for their residence) are not monitored in the Social Work Centres' records. Recipients of child benefits are monitored according to citizenship, while for recipients of parental allowance, childbirth grant, allowance for a large family, childcare allowance, the record does not include citizenship. Based on the number of citizens of Ukraine who have temporary or permanent residence, conclusions can be drawn about the number of persons with temporary protection, who are recipients of child benefits. In 2024, on average, 1,648 children with Ukrainian citizenship were entitled to child benefits.¹⁸⁰

As observed by PIC, the main obstacles that TP beneficiaries face in accessing social assistance in practice is mainly the language barrier and, especially in the first few months of activating temporary protection, long waiting periods until the decision on granting certain forms of social welfare was issued and the payment was executed, as the UOIM and the local Social Work Centres were overloaded with requests, while there was an apparent lack of staff.

G. Health care

The ZZZRO provides that persons enjoying temporary protection have the right to:

- ❖ emergency medical care and emergency transport and the right to emergency dental care;
- ❖ emergency treatment upon a decision of the attending physician,
- ❖ specialist and clinical health care emergencies;
- ❖ health care for women encompassing contraception; abortion and health care during pregnancy and while giving birth;
- ❖ compulsory medical examinations before inclusion in education and during the period of education while attending primary or secondary school, to the same degree as citizens of the Republic of Slovenia.¹⁸¹

In addition to the above, a medical committee appointed by the Head of the Government Office for the Support and Integration of Migrants (UOIM) may, in justified cases, approve a larger scope of health services based on an application from the TP beneficiary,¹⁸² along with any supporting documents

¹⁷⁷ Health Care and Health Insurance Act, Official Gazette of RS, No. 72/06 and subsequent amendments.

¹⁷⁸ Pension and Disability Insurance Act, Official Gazette of RS, No. 48/22.

¹⁷⁹ European Commission, *Employment, Social Affairs & Inclusion: Slovenia - Habitual residence*, available [here](#).

¹⁸⁰ Information provided by the Ministry of Labour, Family, Social Affairs and Equal Opportunities, January 2025.

¹⁸¹ Article 27(1) ZZZRO.

¹⁸² Article 27(2) ZZZRO.

required. In 2024, a total of 148 requests for a larger scope of health services were considered, of which 144 requests were fully granted, 1 was granted only partially and 3 requests were not approved.¹⁸³

Healthcare costs are covered by the UOIM.¹⁸⁴

If the persons are employed in the Republic of Slovenia, they have all the rights arising from compulsory and (if paid) complementary health insurance the same way Slovenian nationals do. This includes the right to have a personal doctor, gynaecologist and dentist, which TP beneficiaries without compulsory health insurance do not have.

Minors from Ukraine enjoy the same full medical care as children that are Slovenian citizens as approved by the Health Commission for children, in accordance with the Decree on the methods for ensuring rights of persons enjoying temporary protection.¹⁸⁵

In practice, the main problems that beneficiaries faced with regard to effective access to health care have been language barrier, the lack of information among providers of medical care regarding the scope of health care for TP beneficiaries, especially children as they have the same full medical care as Slovenian citizens, lacking medical documentation from Ukraine or having to provide an official translation of the documentation, which incurs costs and takes time. A significant issue has also been the number of available medical staff as there is in general a major shortage of health workers and there is consequently a long waiting period for any health care that is not considered emergency medical care. TP beneficiaries also cannot have a personal doctor, unless they are employed and are in this case covered under the compulsory health insurance (in which they can also include their family members), as the condition for an unemployed person to be able to pay for the compulsory health insurance is having permanent residence in Slovenia.

¹⁸³ Official statistics provided by the UOIM, January 2025.

¹⁸⁴ Article 27(3) ZZZRO.

¹⁸⁵ Article 13(5) Decree on the methods for ensuring rights of persons enjoying temporary protection.