

Temporary Protection Portugal

2024 Update

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

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Temporary Protection Procedure

A. General

The Temporary Protection Directive (TPD)¹ has been transposed to the national legal order by Act no.67/2003, of 23 August 2003 (Temporary Protection Act).²

Title (EN)	Original Title (PT)	Web Link
Act. no. 67/2003 of 23 August 2003 (Temporary Protection Act)	Lei n.º 67/2003, de 23 de agosto, que transpõe para a ordem jurídica nacional a Directiva n.º 2001/55/CE, do Conselho, de 20 de julho, relativa a normas mínimas em matéria de concessão de protecção temporária no caso de afluxo maciço de pessoas deslocadas e a medidas tendentes a assegurar uma repartição equilibrada do esforço assumido pelos Estados membros ao acolherem estas pessoas e suportarem as consequências decorrentes desse acolhimento	https://bit.ly/3JhiysX (PT)
<i>Last amended by:</i> Act. no. 20-A/2025 of 26 February 2025	<i>Alterada pela última vez pela:</i> Lei n.º 20-A/2025, de 26 de fevereiro	

According to national law, temporary protection can be activated following a decision of the Council of the EU, or by decision of the national Government, with due regard for the risks to displaced persons, the need and urgency of the provision of temporary protection, and the consequences for public order and national security.³

When a mass influx of displaced persons is predictable, the Government must create an Interministerial Commission, presided by the Ministry of Home Affairs.⁴ This Commission is responsible for, inter alia, assessing reception capacity, defining the reception conditions and their provision, and coordinating the application of temporary protection.⁵

While the **personal scope of application** of temporary protection must be defined by decision of the Council of the EU/national Government, the Temporary Protection Act provides for the **exclusion** of certain persons.⁶ According to the Temporary Protection Act the following persons are excluded from temporary protection in Portugal:

- ❖ Persons with regard to whom there are *strong reasons*⁷ to consider that they:
 - Have committed a crime against peace, a war crime, or a crime against humanity, as defined in national legislation and in the relevant international law instruments to which Portugal is a party;⁸

¹ 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, available [here](#).

² Available [here](#).

³ Article 4(1) and (3) Temporary Protection Act.

⁴ Article 4(2) Temporary Protection Act.

⁵ Article 5 Temporary Protection Act. In 2022, such Commission was created by the Resolution of the Council of Ministers no.29-D/2022, of 11 March 2022, par.15.

⁶ Article 6 Temporary Protection Act.

⁷ The corresponding Directive provision (article 28(1)(a)) refers to “serious reasons” (in Portuguese, “fortes razões”/“razões sérias”).

⁸ Article 6(1)(a)(i) Temporary Protection Act.

- Have committed a serious non-political crime⁹ outside the national territory before they could have been admitted in Portugal as beneficiaries of temporary protection.¹⁰ Within this context, the severity of the criminal procedure must be proportionate to the nature of the infraction. Particularly cruel or inhuman actions may be deemed as non-political crimes even if allegedly committed with a political purpose;¹¹
- Have committed acts contrary to the objectives and principles of the United Nations.¹²
- ❖ Persons with regard to whom there are serious reasons to be considered dangerous to the national security, or that were sentenced by a final judgement for a serious non-political crime or are a *serious*¹³ threat to the national community.¹⁴

The application of the exclusion clauses must be based on the individual behaviour of the person and be proportionate.¹⁵ Exclusion is applicable to both direct participants in the crimes and instigators.¹⁶

The issuance of exclusion decisions is adopted by the Minister in charge of migration, following a reasoned opinion by the Agency for Integration, Migration and Asylum (AIMA),¹⁷ and may be appealed before the administrative courts.¹⁸ In the absence of specific deadlines and procedures, the general rules on administrative appeals apply.¹⁹

Temporary protection had never been activated in Portugal before March 2022, neither by Council decision, nor by decision of the national government.

On 1 March 2022, the Council of Ministers approved a Resolution establishing the criteria for granting of temporary protection for displaced people from Ukraine.²⁰ It has been subsequently amended on 11 March and 22 December 2022, mostly changing the personal scope of temporary protection (see: [Qualification](#)). The relevant Resolutions of the Council of Ministers also determined, inter alia, that:

- ❖ Applications for temporary protection could be made in person or digitally, inside or outside Portuguese territory;²¹
- ❖ Applications for temporary protection are to be immediately referred to the relevant authorities for the issuance of national healthcare system number, tax number, and social security number;²²
- ❖ Employment registration with the relevant national authority is automatic;²³
- ❖ Accommodation and subsistence allowances are to be granted to beneficiaries that do not have sufficient financial resources;²⁴
- ❖ Access to social security by beneficiaries of temporary protection is processed under the rules applicable to refugees.²⁵

⁹ Crime punishable with a prison term of more than 3 years (article 6(5) Temporary Protection Act). This criterion is not contained in the directive's text (article 28(1)(a)(ii)).

¹⁰ Article 6(1)(a)(ii) Temporary Protection Act.

¹¹ Article 6(3) Temporary Protection Act.

¹² Article 6(1)(a)(iii) Temporary Protection Act.

¹³ The qualification of the threat to national community as serious, is not included in the Directive's corresponding provision.

¹⁴ Article 6(1)(b) Temporary Protection Act.

¹⁵ Article 6(2) Temporary Protection Act.

¹⁶ Article 6(4) Temporary Protection Act.

¹⁷ Article 6(6) Temporary Protection Act.

¹⁸ Articles 6(7) and 28 Temporary Protection Act.

¹⁹ General rules provided in the Administrative Procedure Code – CPA (available [here](#)) and in the Code of Procedure in Administrative Courts – CPTA (available [here](#)). Notably, article 58(1)(b) CPTA provides for a general deadline for appeal of 3 months.

²⁰ Resolution of the Council of Ministers no.29-A/2022, of March 2022, available [here](#).

²¹ Resolution of the Council of Ministers no.29-A/2022, of 1 March 2022, last amended by Resolution of the Council of Ministers no.135/2022, of 28 December 2022, par.7, available [here](#).

²² Ibid, par.8.

²³ Ibid, par.9.

²⁴ Ibid, par.12.

²⁵ Ibid, par.13.

The duration of temporary protection was extended twice by the Portuguese Government in the course of 2024. In February 2024, the Government approved a Resolution that extended the validity of temporary protection residence permits until 31 December 2024. The Resolution also transferred the competencies previously allocated to SEF to AIMA.²⁶ In December 2024, the Government approved a Resolution extending the validity of temporary residence permits from 31 December 2024 to 1 March 2025.²⁷

In February 2025, a law amended Article 7 of the Temporary Protection Act to remove the previous time limit foreseen.²⁸ Previously, the law provided for a maximum time limit of three years of temporary protection, all extension periods included. With the amendment, extension of temporary protection may occur on the grounds that the reasons justifying its upholding, recognised by a decision of the Council of the European Union and for the period indicated therein, still exist.

Consequently, in March 2025, the Government approved a Resolution extending the validity of temporary residence permits from 1 March 2025 to 4 March 2026.²⁹

In addition to an online platform for registration for temporary protection (see: [Registration](#)),³⁰ the national authorities created a website gathering information on the national response to displacement from Ukraine. The website allowed people to request and offer help, and its contents are available in Portuguese, English, and Ukrainian.³¹ By the end of 2024, the website was no longer available. CPR has no information on an alternative website.

According to the information provided by SEF regarding 2022, temporary protection cases were analysed by a total of 12 staff members of its regional directorates. AIMA did not provide information regarding the number of staff members analysing cases or further dealing with temporary protection.

According to AIMA's 'Migration and Asylum Report' for 2023,³² there were 54,432 beneficiaries of temporary protection registered in the country by the end of 2023, out of which 46,823 were Ukrainian citizens. 7,519 were third country nationals that lived in Ukraine, mostly from Nigeria, Morocco, India, Algeria and Russia. AIMA did not provide information for 2024.³³

According to Eurostat's data on granting of temporary protection, a total of 72,890 persons have been granted temporary protection in Portugal since the activation of the mechanism, out of which 7,120 in 2024.³⁴

AIMA did not provide information regarding the number of refusals and withdrawals of temporary protection. According to Eurostat's data, no withdrawals have occurred in Portugal since the beginning of the application of temporary protection.³⁵ According to media reports, around 4,000 beneficiaries of temporary protection left Portugal between April and May 2023.³⁶

In response to Parliament in May 2024, the Government stated that there were 3,231 pending temporary protection cases.³⁷

²⁶ Resolution of the Council of Ministers no. 29/2024, 29 February 2024, available [here](#).

²⁷ Resolution of the Council of Ministers no. 178/2024, 5 December 2024, available [here](#).

²⁸ Act no. 20-A/2025, 26 February 2025, available [here](#).

²⁹ Resolution of the Council of Ministers no. 47/2025, 17 March 2025, available [here](#).

³⁰ *SEF for Ukraine*, available [here](#).

³¹ *Portugal for Ukraine* website (no longer available).

³² AIMA, *Relatório de Migrações e Asilo – 2023*, September 2024, available [here](#).

³³ Eurostat's data indicates that by the end of December 2024, there were 61,240 registered beneficiaries in Portugal, available [here](#).

³⁴ Eurostat, *Decisions granting temporary protection by citizenship, age and sex - monthly data*, available [here](#).

³⁵ Eurostat, *Decisions withdrawing temporary protection by citizenship and reason - quarterly data*, available [here](#).

³⁶ Lusa, *Perto de 4.000 refugiados ucranianos já deixaram Portugal*, 5 June 2023, available [here](#).

³⁷ Assembleia da República, Pergunta 25/XVII/1, *Constrangimentos nas respostas da Agência para a Integração, Migrações e Asilo*, April 2024, available [here](#); Assembleia da República, Resposta à Pergunta 25/XVI/1, *Constrangimentos nas respostas da Agência para a Integração, Migrações e Asilo*, May 2024, available [here](#).

B. Qualification for temporary protection

The personal scope of temporary protection has evolved since March 2022. On 1 March 2022, the Council of Ministers approved a Resolution³⁸ that granted temporary protection, with automatic grant of a residence permit, for one year (extendable), to:

- ❖ Ukrainian nationals and their family members coming from Ukraine that could not return to the country due to the war;
- ❖ Non-Ukrainians that prove being related,³⁹ married or in a civil partnership to Ukrainian nationals coming from Ukraine that could not return to the country due to the war.

Said Resolution was amended on 11 March, widening the personal scope of application of the temporary protection regime, and bringing it in line with the subsequent Council decision.⁴⁰ The following persons became entitled to temporary protection:

- ❖ Ukrainian nationals and beneficiaries of international protection in Ukraine, coming from Ukraine, and that cannot return due to the war;
- ❖ Other third country nationals or stateless persons that are in the same conditions as those above and that can prove either that they are related to the persons referred to above, **or** that they were permanent residents in Ukraine/had a temporary residence permit in the country/had a long-term visa in order to obtain such a permit and whose durable return to their country of origin is not possible.

In December 2022, the personal scope of temporary protection in Portugal was once again redefined, this time restricting eligibility. Since then, the following persons are eligible for temporary protection:⁴¹

- ❖ Ukrainian nationals and beneficiaries of international protection in Ukraine, coming from Ukraine, and that cannot return due to the war;⁴²
- ❖ Third country nationals and stateless persons that prove being family members of those referred to above **or** that prove being permanent residents in Ukraine, and whose safe and lasting return to the country of nationality is not possible.⁴³

As such, third country nationals and stateless persons who were not beneficiaries of international protection in Ukraine are only eligible for temporary protection if they are family members of a Ukrainian national/beneficiary of international protection in Ukraine, or if they were permanent residents in the country and cannot return to their country of origin in a safe and lasting manner.

According to the information provided by SEF to the 2022 AIDA Update, third country nationals/stateless persons that were granted temporary protection under the prior rules will continue to benefit from temporary protection. No further information is available in this regard.

The amended Resolution defines family members as:⁴⁴

- ❖ Spouses or unmarried partners in a sustainable relationship, i.e., at least 2 years of living together in conditions analogous to marriage;

³⁸ Resolution of the Council of Ministers no.29-A/2022, of 1 March 2022, available [here](#).

³⁹ It is unclear why the resolution refers to family members twice, given that, if such family members were Ukrainian, they would be already directly included in the personal scope of temporary protection.

⁴⁰ Resolution of the Council of Ministers no.29-D/2022, of 11 March 2022, available [here](#). See also 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, available [here](#).

⁴¹ Resolution of the Council of Ministers no.135/2022, of 28 December 2022, available [here](#). The fully amended text is available [here](#).

⁴² Ibid., par.1.

⁴³ Ibid, par.2.

⁴⁴ Ibid, par.3.

- ❖ Children under 18 years old (of the Ukrainian national/beneficiary of international protection in Ukraine or of their spouse or partner);
- ❖ Other close relatives sharing a household, that are fully or significantly dependent on the Ukrainian national or beneficiary of international protection in Ukraine entitled to temporary protection.

According to the publicly available information, family links can be proved by any available means, including witnesses.⁴⁵

The personal scope of temporary protection was not amended in the course of 2024.

According to the information provided by SEF in the past, in practice, persons who have left Ukraine on or after 1 January 2022 were eligible for temporary protection. It is unclear what was the legal basis for this cut-off date, given the wording of the relevant legislation. It was not possible to confirm this information in any of the public source available at the time of writing, and AIMA did not provide information on this matter.

In 2023, SEF confirmed that persons whose registration for temporary protection was refused were not issued a written decision, nor informed of the right to appeal on a systematic basis. AIMA did not provide information on this matter.

CSTAF did not provide information regarding the number of appeals filed in the Administrative Courts regarding refusals to grant temporary protection in 2024.

C. Access to temporary protection and registration

1. Admission to territory

CPR is not aware of instances of refusal of entry at the border of people fleeing Ukraine nor of difficulties impacting re-entry of people who have returned to Ukraine. AIMA did not provide information for 2024.

Following the TPD, the Temporary Protection Act determines that, if needed, and taking into account the urgency of the situation, the issuance of visas may be fast-tracked and simplified. This is done namely by shortening the deadlines applicable to necessary actions, and by suppressing others.⁴⁶ Such visas are to be issued free of charge.⁴⁷

On 25 February 2022, the Prime-Minister announced that Portuguese Embassies and Consulates had been given instructions to facilitate the issuance of visas to Ukrainian nationals.⁴⁸ It is unclear how this procedure worked in practice.

The *Portugal for Ukraine*⁴⁹ website contained information on leaving Ukraine. Accordingly, persons not holding a biometric passport, must contact a Portuguese Embassy in order to be issued a safe conduct to travel. The portal also directed people in need of transportation to fill in a form to facilitate regular and organised arrivals. It remained unclear which type of support was provided to those have completed this form. By the end of 2024, the website was no longer available. CPR has no information on an alternative website. Information on leaving Ukraine was also provided by the Portuguese authorities through the Ministry of Foreign Affairs webpage.⁵⁰

⁴⁵ See, for instance: Justiça.Gov.Pt, *Reception and Integration of Ukrainian Citizens in Portugal*, available [here](#),

⁴⁶ Article 10(3) Temporary Protection Act.

⁴⁷ Article 10(4) Temporary Protection Act.

⁴⁸ Rádio Renascença, *Costa deu instruções para concessão de vistos imediatos para cidadãos ucranianos*, 25 February 2022, available (in Portuguese) [here](#).

⁴⁹ *Portugal for Ukraine* website (no longer available).

⁵⁰ Available [here](#).

2. Freedom of movement

The law does not provide for any restriction to the internal freedom of movement of persons entitled to and beneficiaries of temporary protection, and CPR is not aware of the application of any such restrictions in practice. CPR is also not aware of significant restrictions on the ability of persons entitled to and beneficiaries of temporary protection to move towards other EU countries.

The Temporary Protection Act regulates the transfer of residence of beneficiaries of temporary protection between EU Member States, broadly in line with article 26 of the Temporary Protection Directive.⁵¹ AIMA did not provide information on this matter for 2024.

Data on de-registrations and onward relocations of beneficiaries to other EU Member States was not provided by AIMA.

According to SEF, a total of 1,531 statuses were cancelled in 2022 (no information on the grounds). The report of the Observatory for Migration covering 2022 (and published in 2023) indicates that there were 1,529 cancellations of temporary protection status in 2022, all of which by request of the beneficiaries.⁵² There is no available data for 2024.

In the report to the Parliament covering 2023 (and published in 2024), the Ombudsperson noted that there have been reports of a lack of response to requests for cancellation of temporary protection status submitted by beneficiaries who wished to move to another country where they would benefit from similar protection.⁵³

In the course of 2024, CPR received similar complaints.

3. Registration under temporary protection

The Resolution of the Council of Ministers approved on 1 March 2022, established that *applications* for temporary protection could be made in person or digitally, inside or outside Portuguese territory.⁵⁴ While according to the information gathered by CPR in early March 2022 the online registration platform⁵⁵ was not yet available, it became operational soon afterwards.⁵⁶

Registration, both online and in-person, is performed by AIMA. AIMA did not provide information regarding the number of staff members analysing cases or further dealing with temporary protection.

According to the available information, only persons over 18 years old can fully complete their registration online. For security reasons, the registration of children requires an in-person stage to be completed. Prior to the termination of SEF's activities this was done at SEF's offices.⁵⁷

⁵¹ Article 26 Temporary Protection Act.

⁵² Observatório das Migrações (OM), *Requerentes e Beneficiários de Proteção Internacional – Relatório Estatístico do Asilo 2023*, p.128, July 2023. While the reports produced by the OM were previously available online, at the time of writing it was not possible to access them online, neither in the website of ACM, which was still online, nor in the website of AIMA.

⁵³ Ombudsperson, *Relatório à Assembleia da República 2023*, July 2024, available [here](#), 67-68.

⁵⁴ Resolution of the Council of Ministers no.29-A/2022, of 1 March 2022, last amended by Resolution of the Council of Ministers no.135/2022, of 28 December 2022, par.7, available [here](#).

⁵⁵ On 18 March 2022, ACM and SEF organised a webinar to civil society and community-based organisations to provide information on the use of the online platform.

⁵⁶ Available [here](#).

⁵⁷ Information previously available at *Portugal for Ukraine* website (no longer available). Similar information can be accessed at: [Justiça.gov.pt, Acolhimento e integração de cidadãos ucranianos em Portugal](#), available [here](#). According to the information available in this website, registration of children must be concluded at SEF's offices or at ACM's National Centres. However, the information has not been updated since the termination of both SEF and ACM. It is unclear if, following the institutional change, registration of children can be performed at all AIMA's offices or not.

While according to the legal framework registration can be performed before entry into national territory, CPR received reports that the online platform requires individuals to insert a date of arrival prior to registration. Nevertheless, in 2022, SEF confirmed that it is possible to register from abroad. AIMA did not provide information in this regard. As such, the situation remains unclear.

The law does not establish any time limits for registration, and CPR has no indication that such limitations exist in practice.

The law does not clearly establish how to prove eligibility for temporary protection. According to the available information, any document proving eligibility (such as a passport or ID) must be presented. The procedure adopted by the authorities regarding undocumented persons is unclear.

Registered persons are issued a *Certificate of preliminary registration on the temporary protection application platform* (Declaração comprovativa de registo prévio na Plataforma de pedido de protecção temporária), proving that their *application* for temporary protection has been recorded. The document bears no reference to the rights attached to it or to its validity.

Beneficiaries of temporary protection are subsequently issued a certificate of temporary protection by AIMA (*certificado de concessão de autorização de residência ao abrigo do regime de proteção temporária*, See [Content of Temporary Protection](#)).

In the course of 2024, CPR became aware of cases of significant delays (up to one year) in the issuance of the certificates of temporary protection without any information being provided by the authorities to the persons concerned. This particularly impacted third-country nationals who lived in Ukraine, many of whom were family members of a Ukrainian citizen.

This problem was also flagged by the Ombudsperson in the report to the Parliament covering 2023 (and published in 2024).⁵⁸

The transfer of competencies previously allocated to SEF to AIMA created additional constraints in this regard, namely in terms of access to information and transparency regarding the competence of services.

In a response to Parliament in May 2024, the Government stated that there were 3,231 pending temporary protection cases.⁵⁹⁶⁰

AIMA did not provide information on the average time for effective registration of beneficiaries of temporary protection in 2024.

The Temporary Protection Act only provides for a right to appeal in case of exclusion or of refusal of a family reunification request.⁶¹

While any decision issued by national administrative authorities in practice can be challenged according to the general administrative rules, SEF confirmed that, in 2022, persons whose registration for temporary protection was refused were not issued a written decision, nor informed of the right to appeal on a systematic basis. AIMA did not provide information in this regard for 2024.

⁵⁸ Ombudsperson, *Relatório à Assembleia da República 2023*, pp.67-68, July 2024, available [here](#).

⁵⁹ Assembleia da República, Pergunta 25/XVI/1, *Constrangimentos nas respostas da Agência para a Integração, Migrações e Asilo*, April 2024, available [here](#).

⁶⁰ Assembleia da República, Resposta à Pergunta 25/XVI/1, *Constrangimentos nas respostas da Agência para a Integração, Migrações e Asilo*, May 2024, available [here](#).

⁶¹ Article 28 Temporary Protection Act.

4. Legal assistance

The Temporary Protection Act does not contain provisions on access to legal assistance and legal aid by persons entitled to temporary protection.

According to CPR's experience, there is no widespread awareness of the advantages of legal assistance within the context of temporary protection eligibility, a fact that is likely related to the features of the regime. CPR provides legal information on access to temporary protection on a needs-basis. Furthermore, upon request, the organisation assists beneficiaries of temporary protection with regard to integration-related matters, such as the rights attached to their status, and access of children born in Portugal to Portuguese nationality.

General provisions on access to **legal aid**, establish that foreigners and stateless persons are entitled to free legal aid if they have a valid residence permit (in an EU Member State), and prove not to hold sufficient income.⁶² Foreigners not holding a residence permit are entitled to free legal aid if there is reciprocity in the legislation of their countries of nationality.⁶³

The Immigration Act also provides for the right to free legal aid to foreigners not admitted into national territory,⁶⁴ to victims of human trafficking/actions to facilitate illegal immigration,⁶⁵ to long term residents with a judicial expulsion decision,⁶⁶ and to persons intending to judicially challenge a coercive removal decision.⁶⁷

In February 2022, the Lawyers' Bar announced the creation of lists of voluntary lawyers available to provide free legal assistance to displaced Ukrainians.⁶⁸ According to the website, the list is constantly updated.

CSTAF did not provide information regarding the number of appeals filed in the Administrative Courts regarding refusals to grant temporary protection in 2024.

5. Information provision and access to NGOs

According to the Temporary Protection Act, beneficiaries of temporary protection must be provided a document stating the rights and duties attached to their status. Such document is to be written in a language they understand.⁶⁹ The Temporary Protection Act does not contain further provisions on access to information and to NGOs.

Within the context of displacement from Ukraine, the national authorities launched a website, available in Portuguese, English and Ukrainian, containing information on eligibility for temporary protection and relevant procedures, as well as the rights attached to the status.⁷⁰ By the end of 2024, the website was no longer available. CPR has no information on an alternative website.

The High Commissioner for Migration (*Alto Comissariado para as Migrações*, ACM) created a specific email address to provide information related to displacement from Ukraine. ACM also listed a number of resources to persons displaced from Ukraine in its website.⁷¹ With the termination of ACM's activities by

⁶² Article 7(1) Access to Law and to Courts Act, available [here](#),

⁶³ Ibid, article 7(2).

⁶⁴ Article 40(2) Immigration Act, available [here](#).

⁶⁵ Ibid, article 112(4).

⁶⁶ Ibid, article 136(4).

⁶⁷ Ibid, article 150(3).

⁶⁸ Ordem dos Advogados, *Apoio aos Cidadãos Ucranianos | Lista de Advogados Voluntários*, 28 February 2022, available [here](#).

⁶⁹ Article 11 Temporary Protection Act.

⁷⁰ *Portugal for Ukraine* website (no longer available).

⁷¹ Alto Comissariado para as Migrações, *SOS Ucrânia* ([no longer available](#)).

the end of October 2023, the website is no longer available. CPR has no information on an alternative website.

Following the beginning of the war in Ukraine, a vast mobilisation for support was observed in Portugal, both within civil society, municipalities and other groups, providing varied assistance. According to the information provided by UNHCR, in 2023, it organised an online workshop for exchange of practices concerning housing among municipalities.

D. Guarantees for vulnerable groups

While the Temporary Protection Act, explicitly refers to the need to provide medical and other assistance to beneficiaries of temporary protection with special needs, such as unaccompanied children, victims of torture, violations or other serious forms of moral, physical or sexual violence,⁷² it does not provide for a mechanism for the identification of specific needs emerging from vulnerabilities.

As mentioned in [AIDA Country Report - Guarantees for vulnerable groups](#), such a mechanism is also not in place within the asylum system. According to the available information, there was no mechanism in place in practice to identify and address such needs within the context of temporary protection. Neither AIMA, nor the Institute of Social Security (ISS) provided information regarding this matter for 2024.

With regards to particularly vulnerable groups, the Temporary Protection Act only refers to specific measures to adopt regarding unaccompanied children.⁷³ Accordingly, unaccompanied children:

- ❖ Must be provided with the necessary legal representation;
- ❖ Must be accommodated with adult family members, in foster families, in specialised reception centres or other appropriate locations, or with the person who took care of them during flight for the duration of the temporary protection.

While this provision is broadly in line with article 16 of the TPD, it failed to transpose into national law the last paragraph of the Directive's provision. As such, it does not refer to the agreement of the adult(s) concerned, and to the need to take into account the child's opinions, considering their age and development.

According to the available information, for security reasons, the registration of children must be completed in-person. This is done in order to perform security checks and to verify parental responsibilities.⁷⁴

The Government established a multidisciplinary group to monitor the protection of unaccompanied children reaching Portugal within this context (ChildCareUKR). The group was initially composed by representatives of the Ministry of Labour, Solidarity and Social Security, Ministry of Justice, SEF and ACM.⁷⁵ According to the information provided by SEF for 2022, this group aimed to facilitate communication between relevant state services and entities and has allowed the identification of appropriate and efficient responses for the integration of children. SEF has previously informed that the group met regularly, and shared a digital platform that facilitated communication between services and

⁷² Article 15(5) Temporary Protection Act.

⁷³ Article 18 Temporary Protection Act.

⁷⁴ Information previously available at *Portugal for Ukraine* website (no longer available). Similar information can be accessed at: [Justiça.gov.pt, Acolhimento e integração de cidadãos ucranianos em Portugal](#), available [here](#). According to the information available in this website, registration of children must be concluded at SEF's offices or at ACM's National Centres. However, the information has not been updated since the termination of both SEF and ACM. It is unclear if, following the institutional change, registration of children can be performed at all AIMA's offices or not.

⁷⁵ Portuguese Republic, *Governo cria plataforma de registo e proteção a crianças ucranianas*, available [here](#).

persons in need of specific assistance.⁷⁶ It remains unclear if the group is still active. Neither AIMA, nor ISS provided information regarding this matter for 2024.

According to the information provided by SEF, a total of 752 applicants for temporary protection were identified as vulnerable in 2022, all of whom unaccompanied children. AIMA did not provide information for 2024.⁷⁷ As in previous years, data on unaccompanied children was also not available at Eurostat at the time of writing.⁷⁸

A specific guide on prevention of trafficking in human beings has been produced and is available in Portuguese, English and Ukrainian.⁷⁹

In December 2024, the 2025-2027 Action Plan to Prevent and Combat Trafficking in Human Beings was adopted.⁸⁰ The plan considers that the humanitarian crisis associated with the armed conflict in Ukraine and the significant influx of people towards the EU increases the risk of exploitative situations related to trafficking in human beings, in particular trafficking for the purpose of sexual exploitation, taking into account the high number of displaced women and children. According to the plan, the strategic objectives are (1) to strengthen knowledge and awareness of trafficking in human beings; (2) to ensure that victims have better access to their rights and assistance; (3) to strengthen the prevention of and fight against organised crime networks in the context of trafficking in human beings.

Notably, the plan does not concretise measures to be taken for the systematic identification of victims of trafficking in human beings, focusing on the need for the intervention of civil society to identify cases.

⁷⁶ See also: Coordenação Nacional Garantia para a Infância, Plano de Acção 2022-2030, pp. 29-30, January 2023, available [here](#).

⁷⁷ A report prepared by the Centre for Social Studies (CES) for the Fundamental Rights Agency (FRA) indicates that, until 30 April 2023, Portugal granted temporary protection to a total of 14,256 children, out of which 701 separated and 15 unaccompanied. This data is not in line with the information previously provided by SEF to the AIDA report. See: CES, *Fundamental rights of children displaced in the EU following the Russian war of aggression – Portugal*, pp.3-4, June 2023, available [here](#).

⁷⁸ Eurostat, *Unaccompanied minors benefiting from temporary protection at the end of the month by citizenship, age and sex - monthly data*, available [here](#). Eurostat, *Decisions granting temporary protection to unaccompanied minors by citizenship, age and sex - annual aggregated data*, available [here](#).

⁷⁹ Comissão para a Cidadania e a Igualdade de Género, *Know the signs for your safety and protection*, available [here](#).

⁸⁰ Resolution of the Council of Ministers no. 194/2024, 24 December 2024, available [here](#).

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? | 1 year |
| 2. How many residence permits ⁸¹ were issued to beneficiaries from the activation of the Temporary Protection Directive until 31 December 2024? | Not available ⁸² |

Beneficiaries of temporary protection are entitled to a temporary protection residence permit to be issued free of charge.⁸³ According to the law, such temporary residence permits must be issued in the EU uniform format for residence permits.⁸⁴ The temporary protection residence permit is valid for one year, and can be renewed for the same period of time.⁸⁵

According to the publicly available information, following registration for temporary protection, AIMA performs the necessary checks, and shares the individual's data with the ISS, health and tax services so that the corresponding user numbers are issued. Beneficiaries of temporary protection are then issued a certificate of temporary protection by AIMA (*certificado de concessão de autorização de residência ao abrigo do regime de proteção temporária*). Following the collection of biometric data, the residence permit (card) should be issued.⁸⁶

Despite this information, according to CPR's experience beneficiaries of temporary protection have not been issued the residence permit (card), at least on a systematic basis. SEF confirmed that this is the case in 2022, and that the non-issuance of residence permits was determined by the Ministry of Home Affairs. AIMA did not provide information on this matter for 2024. This is not only a doubtful practice but may also bear adverse consequences for beneficiaries of temporary protection. Notably, CPR has received reports according to which SEF and the Institute of Registries and Notary (*Instituto de Registos e Notariado*, IRN) deemed the certificate of temporary protection as insufficient to prove legal residence of parents for the purposes of children born in Portugal to acquire Portuguese nationality at birth, as they are supposed to according to the Nationality Act (see: [AIDA Country Report Content of Protection – Naturalisation](#)). According to CPR's observations, this practice continued in 2024.

Furthermore, the certificate is not included in the List of Residence Permits issued by Member States published by the European Commission,⁸⁷ which may lead to issues regarding the recognition of the document across Member States and the crossing of external borders.

According to SEF, a total of 47,782 certificates of temporary protection were issued in 2022. Data on withdrawal was not available. AIMA did not provide information regarding permits issued and withdrawn in 2024. According to Eurostat's data, no withdrawals have occurred in Portugal since the beginning of

⁸¹ See *infra*.

⁸² According to AIMA's 'Migration and Asylum Report' for 2023, there were 54,432 beneficiaries of temporary protection registered in the country by the end of 2023. AIMA did not provide information for 2024. Eurostat's data indicates that by the end of December 2024, there were 61,240 registered beneficiaries in Portugal, available [here](#).

⁸³ Article 10(1) and (4) Temporary Protection Act.

⁸⁴ Ministerial Order no.1432/2008, of 10 December, amended by Ministerial Order no.105-A/2022, of 1 March 2022.

⁸⁵ See, for instance: Justiça.Gov.Pt, *Acolhimento e integração de cidadãos ucranianos em Portugal*, available [here](#).

⁸⁶ Justiça.Gov.Pt, *Acolhimento e integração de cidadãos ucranianos em Portugal*, available [here](#). The website continued to refer to SEF at the time of writing despite the termination of activities of the organisation by the end of October 2023. As per the legal amendments enacted within this context, it seems logical to assume that all administrative competencies in this regard were transferred to AIMA.

⁸⁷ Available [here](#).

the application of temporary protection.⁸⁸ According to media reports, around 4,000 beneficiaries of temporary protection left Portugal between April and May 2023.⁸⁹

In the report to Parliament covering 2023 (and published in 2024), the Ombudsperson noted that constraints were also reported in rectifying incorrect data (such as name or date of birth) entered into the platform and/or already included in the documents issued. As the platform does not allow for corrections, the issuance of new documents requires in-person verification by AIMA, which proved challenging given the delays in service.⁹⁰

According to the information provided by the authorities in the past, access to the full array of rights attached to temporary protection only occurs following the issuance of the certificate of temporary protection. Neither AIMA nor ISS confirmed if this was still the case in 2024. While in the past ISS informed that those waiting may have their socioeconomic situation assessed and receive occasional financial support, information was not provided for 2024.

AIMA did not provide information on the average time for effective registration of beneficiaries of temporary protection in 2024.

2. Access to asylum

Article 3 of the Temporary Protection Act explicitly states that the application of the temporary protection regime is without prejudice to the recognition of refugee status according to the Refugee Convention.⁹¹ Access to the asylum procedure is specifically addressed in articles 19-21 of the Temporary Protection Act.

Beneficiaries of temporary protection can apply for asylum.⁹² If the analysis of the asylum application is not concluded before the end of the temporary protection, it must be completed afterwards.⁹³ The law further determines that beneficiaries of temporary protection remain as such until their asylum application is accepted, and that the refusal of such application does not affect access to or continuation of temporary protection.⁹⁴

In practice, according to the information available to CPR, the number of asylum applications filled by Ukrainian citizens since the activation of the temporary protection is very low. It is unclear whether this is due to lack of interest/need, lack of information or other obstacles in accessing asylum.

The information available to CPR also indicates that at least a significant number of asylum applications filed by Ukrainians after 24 February 2022 but before the activation of the temporary protection regime were, according to information provided by SEF in the past, 'transposed to temporary protection'. It is unclear whether this amounted to a withdrawal of the asylum applications by the persons concerned, and what was the content of information provided in such cases (namely regarding the possible co-existence of asylum procedures and temporary protection).

According to the information provided by SEF to the 2022 AIDA Update, Ukrainian nationals may apply to both regimes. However, the entity also confirmed that persons registering/registered for temporary protection were not systematically informed of their right to apply for international protection. According to SEF, in the course of 2022, 9 Ukrainian nationals decided to apply for international protection instead of temporary protection. Furthermore, SEF stated that the national authorities did not suspend the analysis

⁸⁸ Eurostat, *Decisions withdrawing temporary protection by citizenship and reason - quarterly data*, available [here](#).

⁸⁹ Lusa, *Perto de 4.000 refugiados ucranianos já deixaram Portugal*, 5 June 2023, available [here](#).

⁹⁰ Ombudsperson, *Relatório à Assembleia da República 2023*, July 2024, available [here](#), 67-68.

⁹¹ Article 3 Temporary Protection Act.

⁹² Article 19(1) Temporary Protection Act.

⁹³ Article 19(2) Temporary Protection Act.

⁹⁴ Article 21 Temporary Protection Act.

of asylum applications made by Ukrainian nationals. AIMA did not provide information on any of these matters for 2024.

B. Family reunification

The Temporary Protection Act establishes a specific family reunification regime for persons whose separation was connected to the massive influx of persons in need of protection. Within this context, the following persons are deemed as family members:⁹⁵

- ❖ Spouse;⁹⁶
- ❖ Unmarried children under 18 years old (of the beneficiary of temporary protection or of their spouse);
- ❖ Other close relatives sharing a household, that were fully or significantly dependent on the beneficiary when the facts leading to the massive influx occurred.

Spouses and unmarried children who are beneficiaries of temporary protection in another EU Member State are to be reunified, with due regard to their wishes.⁹⁷ If such family members are not yet in EU territory, they may otherwise be reunified if they are in need of protection.⁹⁸

Reunification of other close relatives listed in the law may occur, following an individual analysis of the challenges that may arise due to the separation.⁹⁹

Decisions on family reunification under this regime are adopted by the Minister in charge of migration, based on a proposal of the Inter-ministerial Commission (see: [General](#)).¹⁰⁰ Refusals may be appealed before the administrative courts.¹⁰¹

Temporary protection residence permits are issued to family members.¹⁰²

C. Movement and mobility

The law does not provide for any restriction to the internal freedom of movement of persons entitled to and beneficiaries of temporary protection, and CPR is not aware of the application of any such restrictions in practice. CPR is also not aware of significant restrictions on the ability of persons entitled to and beneficiaries of temporary protection to move towards other EU countries or of difficulties in re-entering Portugal following a return to Ukraine.

In the report to Parliament covering 2023 (and published in 2024), the Ombudsperson noted that there have been reports of a lack of response to requests for cancellation of temporary protection status submitted by beneficiaries who wished to move to another country where they would benefit from similar protection.¹⁰³

In the course of 2024, CPR received similar complaints.

⁹⁵ Article 17(1) Temporary Protection Act.

⁹⁶ Neither the Temporary Protection Act, nor the list of family members eligible for reunification under the general regime of the Immigration Act refer to unmarried partners. However, article 100 Immigration Act determines that, under the general regime, family reunification may be granted to a partner in a proved unmarried partnership.

⁹⁷ Article 17(2) Temporary Protection Act.

⁹⁸ Article 17(3) Temporary Protection Act.

⁹⁹ Article 17(4) Temporary Protection Act.

¹⁰⁰ Article 17(6) Temporary Protection Act.

¹⁰¹ Article 28 Temporary Protection Act.

¹⁰² Article 17(7) Temporary Protection Act.

¹⁰³ Ombudsperson, *Relatório à Assembleia da República 2023*, July 2024, available [here](#), 67-68.

As mentioned in [Residence Permit](#), according to CPR's experience beneficiaries of temporary protection are not issued an actual residence permit (card). The certificate of temporary protection issued to beneficiaries by the Portuguese authorities is not included in the List of Residence Permits issued by Member States published by the European Commission.¹⁰⁴ This may lead to issues regarding the recognition of the document across Member States and the crossing of external borders.

D. Housing

Indicators: Housing

1. For how long are temporary protection beneficiaries entitled to stay in reception centres? Not applicable
2. Number of beneficiaries staying in reception centres as of December 2024: Not available
3. Number of beneficiaries staying in private accommodation as of December 2024: Not available

According to the Temporary Protection Act, adequate housing must be provided to beneficiaries of temporary protection.¹⁰⁵ The Temporary Protection Act does not provide further elements on the needs assessment or on what constitutes *adequate* housing, nor which entity is responsible for ensuring the provision of housing to beneficiaries of temporary protection. The Temporary Protection Act does not contain provisions on the withdrawal of housing.

In 2022, specific legislative measures were enacted in order to facilitate access to the national programme on urgent housing by beneficiaries of temporary protection (e.g., simplification of bureaucratic requirements, and exemption of verification of availability of financial resources for eligibility for assistance).¹⁰⁶ Beneficiaries of this support receive a financial allowance for housing expenses. The support has a duration of 18 months and can be extended up to 36 months.¹⁰⁷

In 2024, according to ISS, beneficiaries of temporary protection must contact ISS in person or via digital channels to access the provision of reception conditions. Once the beneficiary requests the provision of reception conditions, the case is assigned to a case manager, who will carry out a diagnostic assessment and draw up an individual intervention plan.

While ISS did not share data for 2024, 10,572 beneficiaries of temporary protection were supported by this public entity as of July 2025. Of these, 7,837 were staying in private accommodation, 934 in collective accommodation, 84 in hotels, and 277 in other types of accommodation.

According to ISS, there is an installed capacity for 411 places, but not on an exclusive basis, for beneficiaries of temporary protection:

- ❖ 5 Short-term reception centres – with 141 places;
- ❖ 11 Transitional reception centres – with 177 places;
- ❖ 11 Shared flats – with 75 places;
- ❖ 1 Integration community – with 18 places.

Throughout the year, a number of civil society organisations, such as CPR, were also involved in the provision of housing to beneficiaries of temporary protection.

¹⁰⁴ Available [here](#).

¹⁰⁵ Article 15(1) Temporary Protection Act.

¹⁰⁶ Article 5 Decree-Law no.24-B/2022, of 11 March 2022, available [here](#). See also Decree-Law no.29/2018, of 4 May 2018, available [here](#).

¹⁰⁷ Article 14 Decree-Law no.29/2018, of 4 May 2018, available [here](#). Relevant information was previously available at *Portugal for Ukraine* website (no longer available).

According to ISS, 265 families were receiving extraordinary rent support in July 2025.

Since the beginning of the response to the displacement from Ukraine, private citizens could flag availability to host displaced persons.¹⁰⁸ It is unclear what kind of verification and supervision the public authorities conduct in the case of private offers of housing. By mid-2022, reports of abuse of Ukrainian citizens hosted by private citizens emerged in the press. According to the response provided by ACM in the case of one woman, the housing provision was not framed by an institutional agreement/referral.¹⁰⁹

Research conducted by NOVA Asylum Lab, an academic research initiative, in 2023, identified housing as the most challenging issue within the context of temporary protection. This has also been highlighted by the Association of Ukrainians in Portugal as per media reports.¹¹⁰ The research conducted by NOVA Asylum Policy Lab further detailed that housing-related problems are more significant among persons displaced from Ukraine who are of Asian or African origin.¹¹¹

UNICEF reported receiving accounts of challenges of persons displaced from Ukraine in accessing dignified and stable housing that allows for their integration in Portugal.¹¹²

Neither AIMA, nor ISS provided information regarding mechanisms to prevent and monitor accommodation provided by private entities in 2024.

E. Employment and education

1. Access to the labour market

The Temporary Protection Act establishes that beneficiaries of temporary protection have the right to work.¹¹³ The law further determines that access to work by beneficiaries of temporary protection cannot be to detriment to that of EU nationals and nationals from associated States and that of foreign residents receiving unemployment benefits.¹¹⁴

In principle, the only restriction on employment enshrined in the law impacting beneficiaries of temporary protection consists in limiting access to certain categories of the public sector for all third-country nationals.¹¹⁵ Furthermore, beneficiaries of temporary protection benefit from the same conditions of employment as nationals, including regarding salaries and working hours.¹¹⁶ The law provides, however, for specific formalities in the case of employment contracts of third-country nationals such as the need for a written contract and its (online) registration with the Authority for Labour Conditions (*Autoridade para as Condições do Trabalho*, ACT).¹¹⁷

In the report to the Parliament covering 2023 (and published in 2024), the Ombudsperson noted that during the year complaints had been received regarding delays in the issuance of Social Security Numbers (NISS) and Tax Identification Numbers (NIF). Both are necessary to have, among others,

¹⁰⁸ The online form asks questions such as: name, telephone, email address, type of housing (room, apartment, house); is the housing shared; duration of the availability; location; further information (open answer without specific requirements).

¹⁰⁹ See, for instance: RTP, *Prova dos Factos. Ucraniana alvo de abusos na família que a acolheu em Portugal*, 6 May 2022, available [here](#).

¹¹⁰ See, for instance: RTP, *Habitação é o principal problema dos refugiados ucranianos em Portugal*, 7 February 2023, available [here](#).

¹¹¹ NOVA Asylum Policy Lab, *Policy Brief – The reception of displaced persons from Ukraine in Portugal*, January 2023, available [here](#).

¹¹² Information provided by UNICEF to the AIDA 2023 Update.

¹¹³ Article 14(1) Temporary Protection Act.

¹¹⁴ Article 14(2) Temporary Protection Act. It is unclear if this limitation is being applied in practice and how.

¹¹⁵ Article 15(2) Constitution and Article 17(1)(a) and (2) Act 35/2014.

¹¹⁶ Article 4 Labour Code.

¹¹⁷ Article 5 Labour Code.

effective access to the labour market. According to the same source, following contacts with relevant actors such as the Institute for Social Security and the Fiscal Authority, the delays were mostly related to technological challenges.¹¹⁸

Following the activation of the temporary protection regime, a number of legislative provisions were enacted regarding the recognition of qualifications and competencies of beneficiaries of temporary protection.¹¹⁹ Accordingly, such requests have priority and are exempted from a number of bureaucratic requirements such as certification of documents issued by foreign entities, certification of copies, and recognition of translations. Applicants are also exempted from the payment of fees.

A subsequent Decree-Law,¹²⁰ further regulated the recognition of professional qualifications of beneficiaries of temporary protection, establishing, inter alia, procedures for situations of insufficient documentation due to the war.¹²¹

Specific measures were also adopted regarding recognition and exchange of driving licences and professional driver's certifications.¹²²

According to the publicly available information available, beneficiaries of temporary protection who wish to receive employment-related support must register in the Employment and Vocational Training Institute (*Instituto do Emprego e Formação Profissional*, IEFP), either in person or online.¹²³

Registration in IEFP also enables beneficiaries of temporary protection to certified Portuguese courses.¹²⁴ Data on the number of beneficiaries of temporary protection that had access to such courses was not available at the time of writing.

According to the report published by the Observatory for Migration in 2023, data provided by IEFP, indicated that, by the end of 2022, 14,205 beneficiaries of temporary protection were registered with the service. IEFP also reported being aware of the conclusion of 7,121 employment contracts by beneficiaries of temporary protection.¹²⁵ There is no available data for 2024.

Data on the number of beneficiaries of temporary protection registered in IEFP or employed by the end of the year was not available at the time of writing.

2. Access to education

According to the Temporary Protection Act, child beneficiaries of temporary protection are entitled to access public education under the same conditions as nationals.¹²⁶

A Ministerial Order of the Ministry of Work, Solidarity and Social Security issued in April 2022, established special measures for the integration of children displaced from Ukraine in kindergarten and other leisure facilities, determining, inter alia, that the regular capacity of facilities may be exceptionally extended to ensure integration, and that such children are entitled to attend kindergarten free of charge.¹²⁷

¹¹⁸ Ombudsperson, *Relatório à Assembleia da República 2023*, July 2024, available [here](#), 67-68.

¹¹⁹ Article 6 Decree-Law no.24-B/2022, 11 March 2022, available [here](#).

¹²⁰ Decree-Law no.28-B/2022, of 25 March 2022, available [here](#).

¹²¹ Ibid, article 4.

¹²² Article 4 Decree-Law no.24-B/2022, 11 March 2022, available [here](#).

¹²³ [Justiça.gov.pt](#), *Acolhimento e integração de cidadãos ucranianos em Portugal*, available [here](#) (section on Employment).

¹²⁴ Further information on identification of relevant courses and opportunities is available at: [Justiça.gov.pt](#), *Acolhimento e integração de cidadãos ucranianos em Portugal*, available [here](#) (Learning Portuguese section).

¹²⁵ Observatório das Migrações (OM), *Requerentes e Beneficiários de Proteção Internacional – Relatório Estatístico do Asilo 2023*, pp.217 et seq, July 2023. While the reports produced by the OM were previously available online, at the time of writing it was not possible to access them online, neither in the website of ACM, which was still online, nor in the website of AIMA.

¹²⁶ Article 16 Temporary Protection Act.

¹²⁷ Ministerial Order no. 138/2022, of 8 April 2022, available [here](#).

DGE also reported that informal settings to promote the integration of children not attending other national services are also being developed. The so-called *Learn, Play, Grow Groups* are aimed at children up to 4 years old, accompanied by a caregiver, and may be implemented by entities such as municipalities and civil society organisations with the support of DGE.¹²⁸

In March 2022, the Directorate General for Education (*Direção-Geral da Educação*, DGE), adopted a circular-letter clarifying a number of aspects related to the swift integration of children displaced from Ukraine in the **national education system**.¹²⁹ Notably, with regard to equivalences and school placement, it was determined that ensuring access and immediate integration is the priority, and that the rules established for asylum applicants are applicable. Additionally, the conversion tables of Ukrainian school system to the Portuguese school system apply. The circular-letter also reinforced that schools may adopt specific measures in order to support children whose first language is not Portuguese, also in line with what is established for applicants for international protection (see: [AIDA Country Report – Access to Education](#)). This circular-letter was complemented by two others issued in 2023, notably regarding access to online schooling provided by the Ukrainian authorities by child beneficiaries of temporary protection in Portugal.¹³⁰

Between 2024 and beginning of 2025, a number of legal provisions on education were published, namely a new Regulation for external assessment tests and frequency equivalence tests,¹³¹ a new learning recovery plan placing Portuguese learning classes as the pillar for promoting inclusion,¹³² a new Regulation on basic education provision that includes measures such as level zero for students who are unfamiliar with the Portuguese language and alphabet,¹³³ and a new framework for a simplified school placement of children¹³⁴ (see: [AIDA Country Report – Access to Education](#)).

DGE published guides on integration of Ukrainian children in pre-school education and in subsequent school levels.¹³⁵ With regards to integration in the school system, the guidance establishes, inter alia, that:

- ❖ Regarding students whose parents/legal representative choose to follow Ukrainian remote learning;
 - No equivalences or certification is granted;
 - Students must be present in a Portuguese school during the online activities provided by Ukrainian schools;
 - Students must attend the Portuguese as second language subject, as defined by the relevant school;
 - Students are provided with the necessary resources such as IT equipment and work space;
 - The specificities of the implementation are defined by schools.
- ❖ Regarding students fully integrated in the Portuguese education system;
 - As mentioned above, the rules established for access to education by asylum seeking children are applicable to this group;
 - Their activities may be complemented by resources provided by the Ukrainian National Online School.

Neither DGE nor DGEstE were able to provide the number of child beneficiaries of temporary protection enrolled in the national education system by the end of 2024.

¹²⁸ For more information, see [here](#).

¹²⁹ DGE, *Ofício-Circular 10976/2022/DGE-DSDC-ECE*, 16 March 2022, available [here](#).

¹³⁰ DGE, *Ofício-Circular 662/2023/DGE-DSDC-DEPEB*, 9 January 2023, available [here](#). DGE, *Ofício-Circular 30172/2023/DGE-DSDC-DEPEB*, 14 June 2023, available [here](#).

¹³¹ Legislative Order no. 4/2024, 21 February 2024, Article 12(7).

¹³² Council of Ministers Resolution no. 140/2024, 17 October 2024.

¹³³ Order no. 29/2025, 7 February 2025.

¹³⁴ Decree-Law 7/2025, 11 February 2025.

¹³⁵ DGE, *Integração de crianças refugiadas na educação pré-escolar*, 15 March 2023 (guidance for pre-school integration), available [here](#) (in Portuguese); DGE, *Orientações para o acolhimento, a integração e a inclusão de crianças e jovens ucranianos*, April 2023 (guidance for subsequent education levels), available [here](#).

According to DGEstE, during 2024 it continued to support coordination between reception entities/carers and public schools to ensure integration in the education system. With the exception of some isolated cases, according to this public body there have been no limitations on access to the education system by child beneficiaries of temporary protection.

According to a report by the Centre for Social Studies (CES) for the Fundamental Rights Agency (FRA), the Ministry of Education informed that by February 2023, 4,488 child beneficiaries of temporary protection were enrolled in the national education system (from pre-school to secondary education levels). Of the number of child beneficiaries of temporary protection, CES estimated that 9,620 child beneficiaries of temporary protection were not included in the national education system.¹³⁶ This may be connected to the parents opting for their children to continue following teaching provided by Ukrainian schools.

According to the same report, there is no evidence of differential treatment between Ukrainian and non-Ukrainian children displaced by the conflict in access to education or other services.¹³⁷

The report of the Observatory for Migration covering 2022 (and published in 2023) indicates that, according to official data, a total of 4,907 child beneficiaries of temporary protection were enrolled in the national school system, which amounted to 35% of the child beneficiaries of temporary protection at the time.¹³⁸ According to the same source, information regarding the remaining children was not available.¹³⁹ There is no available statistical report for 2024.

UNICEF has also flagged concerns regarding the low number of child beneficiaries of temporary protection enrolled in the national education system, noting that factors such as the feeling that the displacement will be temporary, as well as social and housing instability may increase non-enrolment.¹⁴⁰

UNICEF has also noted that issues such as reconciling the distance learning provided by the Ukrainian authorities with integration in the Portuguese system, and the impact of forced displacement in the well-being of children and their families may have had an impact in access to education in Portugal by child beneficiaries of temporary protection.¹⁴¹

The implementation of the specific measures related to Education is monitored by a group composed of different bodies of the Ministry for Education, ACM, and others.¹⁴² It is unclear whether this has been impacted by the termination of ACM's operations.

DGE also reported that language resources on Portuguese as a second language for Ukrainians were made available through the public radio and television.¹⁴³

At the time of writing, no evaluation of the adopted measures was publicly available.

¹³⁶ Centre for Social Studies, *Country research – Fundamental rights of children displaced in the EU following the Russian war of aggression – Portugal*, June 2023, p.11, available [here](#).

¹³⁷ Centre for Social Studies, *Country research – Fundamental rights of children displaced in the EU following the Russian war of aggression – Portugal*, June 2023, p.12, available [here](#).

¹³⁸ Observatório das Migrações (OM), *Requerentes e Beneficiários de Proteção Internacional – Relatório Estatístico do Asilo 2023*, pp. 210-211, July 2023. While the reports produced by the OM were previously available online, at the time of writing it was not possible to access them online, neither in the website of ACM, which was still online, nor in the website of AIMA.

¹³⁹ Ibid. See also: NOVA Asylum Policy Lab, *Policy Brief – The reception of displaced persons from Ukraine in Portugal*, pp. 20 et seq January 2023, available [here](#).

¹⁴⁰ Information provided by UNICEF to the 2023 AIDA Update. In 2023, UNICEF prepared an awareness-raising video in this regard. Available [here](#).

¹⁴¹ Information provided by UNICEF to the 2023 AIDA Update.

¹⁴² Information previously available at: *Portugal for Ukraine* website (no longer available).

¹⁴³ RTP Ensina, *Português para Ucrânianos*, available [here](#).

With regard to higher education, Decree-Law no.24-B/2022, of 11 March 2022,¹⁴⁴ established that beneficiaries of temporary protection may request the application of the 'student in an emergency situation for humanitarian reasons' status (see [AIDA Country Report – Access to Education](#)).¹⁴⁵ Access to such status was clarified by Decree-Law no.28-A/2022, of 25 March,¹⁴⁶ establishing inter alia, that:

- ❖ Requests may be presented at any time to the relevant higher education institutions;
- ❖ Students in this situation may require registration in a higher education institution/degree congeneric to the one previously attended (same academic level and equivalent training);
- ❖ The integration of student beneficiaries of temporary protection is not limited by *numerus clausus* regularly applicable, and may occur in all levels of higher education, including in the field of Medicine;
- ❖ If documentary evidence of the qualifications is not available, the higher education institutions may resort to alternative verification methods;¹⁴⁷
- ❖ Student beneficiaries of temporary protection that were already enrolled in higher education may also request the 'student in an emergency situation for humanitarian reasons' status.

The same Decree-Law also establishes that beneficiaries of temporary protection holding foreign certificates or diplomas that are not sufficient for recognition in Portugal must be ensured access to a higher education institution granting a degree in the same field, upon request, as well as the rules applicable to such procedures.¹⁴⁸

The Directorate-General for Higher Education (*Direção-Geral do Ensino Superior*, DGES), and the national ERASMUS+ Agency, both published resources with information on access to higher education in Portugal, social support in higher education, and recognition of academic degrees and diplomas, both in Portuguese and Ukrainian.¹⁴⁹

Requests for 'student in an emergency situation for humanitarian reasons' status, must be filled with proof that the applicant is a beneficiary of temporary protection.¹⁵⁰ Admission to higher education institutions may be granted with exemption from some of the regular admission requirements, such as knowledge of the teaching language, and specific academic qualifications.¹⁵¹

Students with this status may also request financial support to attend higher education, with exceptional conditions applying, such as a simpler process to determine eligibility.¹⁵² Students may also benefit from a scholarship.¹⁵³ Failure to renew the permit that establishes the 'emergency situation for humanitarian reasons' status will result in the termination of the scholarship.

At the beginning of 2025, a law was enacted establishing the legal framework for housing supplements for displaced higher education students.¹⁵⁴ Beneficiaries in 'emergency situations for humanitarian reasons' and beneficiaries of temporary protection are considered displaced students.¹⁵⁵

¹⁴⁴ Article 3.

¹⁴⁵ Article 8-A Decree-Law no.36/2014, of 10 March 2014, added by Decree-Law no. 62/2018, of 6 August 2018, available [here](#).

¹⁴⁶ Article 2.

¹⁴⁷ Such as interviews and tests while the national authorities finalise accession to the European Qualifications Passport for Refugees. See Agência Nacional ERASMUS+, *Nota Estudantes em situação de emergência humanitária*, p.2, available [here](#).

¹⁴⁸ Article 3 Decree-Law no.28-A/2022, of 25 March 2022, available [here](#).

¹⁴⁹ Available [here](#) and [here](#) respectively.

¹⁵⁰ Request for registration for temporary protection is not sufficient. See: Agência Nacional ERASMUS+, *Nota Estudantes em situação de emergência humanitária*, p.2, available [here](#).

¹⁵¹ Ibidem.

¹⁵² Ibid, p.4.

¹⁵³ Order no. 9619-A/22, 4 August 2022, amended by Order no. 7647/2023, 24 July 2023.

¹⁵⁴ Act no. 8/2025, 5 February 2025. In July 2025, there was no regulation in place to allow for its immediate implementation.

¹⁵⁵ According to DGES, this regime will take effect from the 2025/2026 academic year and may include supplements of up to €400/year.

The report of the Observatory for Migration covering 2022 (and published in 2023) indicates that in the 2022/2023 school year, a total of 366 students displaced from Ukraine had this status.¹⁵⁶ There is no available statistical report for 2024.

As mentioned in [Access to the Labour Market](#),¹⁵⁷ requests for the recognition of qualifications of beneficiaries of temporary protection have priority, and are exempted from a number of bureaucratic requirements such as legalisation of documents issued by foreign entities, certification of copies, and recognition of translations. Applicants are also exempted from the payment of fees.

In June 2022, it was reported in media outlets that Medical Schools were granting differentiated treatment to Ukrainian and non-Ukrainian beneficiaries of temporary protection. According to the reports, while Ukrainian beneficiaries were integrated in the institutions, non-Ukrainian beneficiaries were not given swift answers and the institutions claimed that the situation of those two groups was not similar, and that there were capacity limitations to consider. According to the same article, the ministry of Higher Education claimed that it did not consider that the legal framework allowed such a differential treatment.¹⁵⁸ It is unclear whether similar cases occurred in 2024.

At the time of writing, no evaluation of the adopted measures was publicly available.

According to DGES, until September 2022, a total of around 330 requests for recognition of academic degrees were filed by Ukrainian citizens, of which around 100 belonged to beneficiaries of temporary protection.¹⁵⁹ Information for 2024 was not available at the time of writing.

F. Social welfare

The Temporary Protection Act provides for the right of beneficiaries of temporary protection to access social welfare benefits and means of subsistence in the absence of personal resources.¹⁶⁰

The Council of Ministers determined that such benefits are to be granted to beneficiaries of temporary protection that do not have sufficient resources, and that beneficiaries of temporary protection must receive treatment equal to that granted to refugees in accessing non-contributory social welfare benefits.¹⁶¹

In particular, beneficiaries of temporary protection with insufficient resources may access the Social Reinsertion Revenue (*Rendimento Social de Inserção*, RSI) and child-related allowances (see [AIDA Country Report, Content of Protection – Social Welfare](#)). Requests for such allowances must be filled in at ISS.

Additionally, an extraordinary support allowance for particularly vulnerable families was created in March 2022.¹⁶² According to the law, this allowance was meant to support families that were particularly exposed to the increase of food prices.¹⁶³ Beneficiaries of temporary protection were able to access this support if

¹⁵⁶ Observatório das Migrações (OM), *Requerentes e Beneficiários de Proteção Internacional – Relatório Estatístico do Asilo 2023*, p.213, July 2023. While the reports produced by the OM were previously available online, at the time of writing it was not possible to access them online, neither in the website of ACM, which was still online, nor in the website of AIMA.

¹⁵⁷ Article 6 Decree-Law no.24-B/2022, 11 March 2022, available [here](#).

¹⁵⁸ Público, *Há escolas de Medicina que só estão a aceitar alunos ucranianos e excluem outros refugiados*, 19 June 2022, available [here](#) (in Portuguese; access to the article is restricted by a paywall).

¹⁵⁹ RTP Madeira, *Portugal já reconheceu qualificações académicas de 100 refugiados ucranianos*, 25 November 2022, available [here](#).

¹⁶⁰ Article 15(2) Temporary Protection Act.

¹⁶¹ Resolution of the Council of Ministers no.29-A/2022, of 1 March 2022, last amended by Resolution of the Council of Ministers no.135/2022, of 28 December 2022, par.12 and 13, available [here](#).

¹⁶² Articles 4-8 Decree-Law no.28-A/2022, of 25 March 2022, available [here](#).

¹⁶³ Ibid, article 4.

they fulfilled the relevant criteria. In 2022, it consisted of a one-time allowance of € 60 per family unit, paid in April 2022.¹⁶⁴ It was automatically granted by ISS based on the information available to the entity.¹⁶⁵ In 2023, the amount of the extraordinary allowance (reframed as a measure to mitigate the impacts of inflation) was of € 30 per family unit per trimester.¹⁶⁶

Beneficiaries of temporary protection may also access support provided by a social worker, and may resort to the Social Emergency Hotline¹⁶⁷ in case of need.¹⁶⁸

According to the information provided by ISS, by July 2025, a total of 68,230 social security identification numbers (NISS) had been granted to beneficiaries of temporary protection. ISS also reported that around 27,398 beneficiaries had been approved for some measure of social welfare assistance (general system), including RSI and child-related allowances. Regarding extraordinary support allowances, ISS further reported that a total 35,147 allowances had been granted until July 2025, including extraordinary allowances for vulnerable families and extraordinary allowances for persons whose income relied on social welfare support.

According to the information provided by ISS, occasional delays in accessing social benefits are related to technological challenges.

G. Health care

The Temporary Protection Act provides for the right of beneficiaries of temporary protection to medical assistance, comprising emergency care and primary health care.¹⁶⁹ It further determines the provision of assistance (medical and other) to beneficiaries of temporary protection with special needs such as unaccompanied children, victims of torture, violations or other forms of moral, physical or sexual violence.¹⁷⁰

The Resolution of the Council of Ministers concerning temporary protection determines that the grant of protection is communicated to the national health services *ex officio* by AIMA, and a National Healthcare System number is automatically granted to each beneficiary.¹⁷¹ According to the information publicly available, the issuance of the user number entitles beneficiaries of temporary protection to access all the services provided by the National Healthcare System (which is public and mainly free).¹⁷²

In the report to the Parliament covering 2023 (and published in 2024), the Ombudsperson noted that during the year complaints had been received regarding delays in the issuance of the National Healthcare System number. According to the same source, the delays were mostly related to technological challenges.¹⁷³

¹⁶⁴ Ibid, article 6.

¹⁶⁵ Ibid, article 7.

¹⁶⁶ Article 2(2) Decree-Law no.21-A/2023, of 28 March, available [here](#). The Decree-Law also established an additional allowance for children (article 3).

¹⁶⁷ A 24h/day line, reachable by dialling 144.

¹⁶⁸ *Portugal for Ukraine* website (no longer available).

¹⁶⁹ Article 15(4) Temporary Protection Act.

¹⁷⁰ Article 15(5) Temporary Protection Act.

¹⁷¹ Resolution of the Council of Ministers no.29-A/2022, of 1 March 2022, amended by Resolutions of the Council of Ministers no. 29/2024, 29 February 2024, no. 178/2024, 5 December 2024, and no. 47/2025, 17 March 2025,

¹⁷² [Justiça.gov.pt](#), *Acolhimento e integração de cidadãos ucranianos em Portugal*, available [here](#) (section on Health). Basic fees apply based on the social and economic situation of each person, with a number of exemptions provided in the law. For more information on applicable fares and exemptions see: Serviço Nacional de Saúde, *Guia do Utente*, available [here](#).

¹⁷³ Ombudsperson, *Relatório à Assembleia da República 2023*, July 2024, available [here](#), 67-68.

In order to have a family doctor assigned, beneficiaries of temporary protection must then register in the health care unit of their area of residence.¹⁷⁴ According to the information previously available at the Portugal for Ukraine website, a specific medical service for children coming from Ukraine was set up, with referrals made by phone. According to the same source, these appointments were supported by an interpreter and allowed doctors to make the necessary referrals to specialist services.¹⁷⁵

Regarding vaccination, in March 2022, the Directorate-General for Health (*Direção-Geral de Saúde*, DGS), published a technical note on vaccination of persons within the context of displacement from Ukraine. It reinforces the right of all persons present in Portugal to access vaccination in line with the National Plan, establishes technical criteria for administration of vaccines and defines priorities considering the epidemiologic situation in the country of origin.¹⁷⁶

¹⁷⁴ Ibidem.

¹⁷⁵ The *Portugal for Ukraine* website is no longer available.

¹⁷⁶ DGS, *Norma n.º 003/2022*, 19 March 2022, available [here](#) (in Portuguese).