

Temporary Protection Hungary

2025 Update

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

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Temporary Protection Procedure

A. General

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

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

On 24 February 2022 at 10:00 PM in the evening, Government Decree 56/2022 (II.24.) came into effect, invoking point b) of Section 19(1) of the Asylum Act. The Hungarian Government, being the first in Europe, decided to grant temporary protection to everyone who had a legal basis to stay in Ukraine and fled the country to Hungary, regardless of their nationality. The national protection provided thereby was applicable until 7 March 2022. From 8 March 2022 to 20 July 2025 Government Decree No. 86/2022. (III. 7.) (TP Decree) was applicable. The TP Decree, transposing the provisions of the Council Implementing Decision,³ activated temporary protection under point a) of Section 19(1) of the Asylum Act, under which the TPD becomes applicable in Hungary. The former government decree based on national TP accorded a more extensive protection than the rules promulgated in the TP Decree, because it allowed non-Ukrainian third-country nationals fleeing from and legally residing in Ukraine to apply for temporary protection. However, that is no longer possible under the TP Decree currently in force (see [Qualification for Temporary Protection](#)). The new decree was applicable for those whose procedures had not been concluded when it came into force. In practice this retroactive effect only concerned the determination of the applications lodged by third-country nationals.⁴

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

In 2025, most of the regulation on temporary protection was transposed into two new legal instruments; Act L of 2025 on transposing the emergency government decrees issued in view of the armed conflict in

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

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

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

⁴ Section 12 of TP Decree.

Ukraine to law and Government Decree No. 196/2025 (VII.8.) on the repeal of certain emergency government decrees issued during the state of emergency declared in view of the armed conflict in Ukraine. The new legislation came into effect on 20 June 2025.

Regarding the main applicable laws in force concerning temporary protection in Hungary, see the following table:

Title (EN)	Original Title (HU)	Web Link
Act LXXX of 2007 on Asylum (Asylum Act)	2007. évi LXXX. törvény a menedéjogról	https://tinyurl.com/5926ntej (HU)
Government Decree No.301/2007 (XI. 9.) on the implementation of Act LXXX of 2007 on asylum (Asylum Decree)	301/2007. (XI. 9.) Korm. rendelet a menedéjogról szóló 2007. évi LXXX. törvény végrehajtásáról	https://tinyurl.com/mt7aubvt (HU)
Act L of 2025 on converting the emergency government decrees issued in view of the armed conflict in Ukraine to law	2025. évi L. törvény az Ukrajna területén fennálló fegyveres konfliktusra tekintettel kihirdetett veszélyhelyzeti rendeletek törvényi szintre emeléséről	https://tinyurl.com/47hjh7u9 (HU)
Government Decree No. 196/2025 (VII.8.) on the repeal of certain emergency government decrees issued during the state of emergency declared in view of the armed conflict in Ukraine	196/2025. (VII. 8.) Korm. rendelet az Ukrajna területén fennálló fegyveres konfliktusra tekintettel kihirdetett veszélyhelyzet során kiadott egyes veszélyhelyzeti kormányrendeleti szabályok kivezetéséről	https://tinyurl.com/45smbzc4 (HU)
Government Decree No. 147/2022 (IV.14.) on the provision of childcare services to accompanied children who have arrived from the territory of Ukraine, with respect to the state of danger	147/2022 (IV. 14.) Korm. rendelet a veszélyhelyzetre tekintettel az Ukrajna területéről kísérővel érkezett gyermekek gyermekfelügyelettel történő ellátásáról	http://bit.ly/3RfICb0 (HU)
Government Decree No. 121/2022 (III.28.) on the emergency rules of employment of healthcare workers fleeing from Ukraine	121/2022. (III. 28.) Korm. rendelet az Ukrajnából menekült egészségügyi dolgozók magyarországi foglalkoztatásának veszélyhelyzeti szabályairól	https://tinyurl.com/2r5h9r72 (HU)

There are no official statistics available regarding the number of those who were displaced directly or indirectly by the conflict present in Ukraine but that do not come under the scope of TPD in Hungary, however two groups are worth mentioning in this context.

A possibly significant number of Hungarian-Ukrainian dual citizens residing in Ukraine fled to Hungary as a result of the war. For reasons of historical specificity, around 150,000 ethnic Hungarians live in the **Zakarpattia** Oblast region in Ukraine, close to the Hungarian border.⁵ Although there is no official data as to the number of those who hold both Hungarian and Ukrainian citizenship within the group of ethnic Hungarians, according to the 2015 data of the Hungarian Central Statistical Office, 88,339 persons were living in Ukraine with Hungarian citizenship,⁶ and it might be assumed that most of them belong to the

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

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

Hungarian minority. Naturally, after 24 February 2022, dual citizens and Hungarian-speaking Ukrainians also started to flee to Hungary, primarily from the **Zakarpattia** region. These people, however, did not fall under the Asylum Act and temporary protection scheme due to their Hungarian citizenship. At the same time, most of them could not enjoy all the rights to which Hungarian citizens are entitled, since most of those rights are tied to Hungarian social security status and registered address. Therefore, the TP Decree activating the application of the TPD and Council Decision introduced a special provision concerning dual citizens by stating that all benefits and advantages that are granted to a temporary protection beneficiary are to be granted to Hungarian citizens who had a permanent residence in Ukraine and arrived from Ukraine on or after 24 February 2022, unless they are granted more favourable treatment by virtue of their Hungarian citizenship.⁷ This provision was also included in Section 10 (3) of Act L of 2025. This means in practice that dual citizens may access reception conditions and financial support (see Status and residence and Housing) in the same manner as temporary protection beneficiaries (see [Residence Permit](#)). Although there is no official data as to the numbers of Hungarian-Ukrainian dual citizens residing in Ukraine fled to Hungary as a result of the war, but based on the information the Hungarian Helsinki Committee (HHC) received from the Ministry of National Economic, 32,061 requests for financial support were submitted by dual citizens to competent government authority between February 2022 and 31 December 2024.⁸ No such data was provided in 2025. This figure is, of course, only indicative regarding the number of dual citizens who wished to claim financial assistance under the TP scheme, but there is no official information on the exact number of dual citizens who fled from Ukraine to Hungary for the war.

Although the number may be lower than that of dual citizens, a group of indirectly displaced people that fall outside of the scope of TPD but that must be highlighted is that of Russian nationals staying in Hungary without (more permanent) legal basis who, having strong anti-war sentiments or fearing military conscription and/or the negative consequences of the newly adopted anti-LGBTQ law, do not want to return to Russia, but have no permanent basis to stay in Hungary either. The HHC provided legal assistance to 4 such Russian nationals in 2022, 9 such Russian nationals during 2023 and 2024 and 13 Russian nationals in 2025. These clients generally wish to claim asylum, but currently it is not possible to submit an asylum application directly in Hungary, only if it is preceded by the so-called embassy procedure initiated at the Hungarian embassy in Ukraine or Serbia (see [General Report – Embassy Procedure](#)).

Nevertheless, partly due to litigation efforts in 2025 and in previous years, the number of Russian clients in asylum procedure increased in 2025; of the 13 Russian clients represented by the HHC in 2025, 9 were in an asylum procedure. Three clients were transferred to Hungary under the Dublin Regulation, four of them gained access to the asylum procedure through litigation, one of them could submit an asylum application in Hungary under the current law and one person applied for asylum through the Embassy procedure. The other four Russian clients applied for temporary protection.

Four Russian clients of the HHC received refugee status in 2025. One client expressed strong anti-war views. Working for an NGO in Hungary, he actively assisted Ukrainian refugees and Russian nationals fleeing Russia. He was a member of the LGBTQ community and would have faced the threat of being forcibly drafted to the Russian military if he returned. Three other Russian clients of the HHC, who were returned to Hungary under the Dublin Regulations also received refugee status. Two of them, a father and son were Jehovah's witnesses; the fourth client also received refugee status due to his anti-war political opinion, sexual orientation and threat of forced military service.

Three of the four Russian clients represented in TP procedure, a mother and her two children applied for TP based on the fact that the father of the children was a Ukrainian Hungarian dual national. The fourth client had a permanent residence permit in Ukraine and thus should have received TP or other adequate protection (for more details of his case, see section B - Qualification for temporary protection). The procedures were on-going at the end of 2025.

⁷ Section 8 of TP Decree.

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

According to UNHCR’s estimation, as of 31 December 2025, there were 65,450 refugees from Ukraine present in Hungary. This figure includes TP holders, Ukrainian asylum-seekers and recipients of refugee status or subsidiary protection, and Ukrainians granted another form of stay (i.e. various types of residence permits).

As regards applicants and beneficiaries, there were:

- ❖ 43,300 temporary protection beneficiaries on 31 December 2025.
- ❖ 452 pending temporary protection applications on 31 December 2025.
- ❖ 33,273 individuals registered for temporary protection between 25 February and 31 December 2022;⁹ in 2023, 7, 776 applications were registered, in 2024, 8, 070 and, in 2025 6,091.¹⁰
- ❖ Between 24 February 2022 and 31 December 2025, 2,093 individuals who registered for temporary protection but because of the procedure and for the applicability of non-refoulement received tolerated status instead of temporary protection status.¹¹

Applicants and beneficiaries				
	As of 31 December 2022	As of 31 December 2023	As of 31 December 2024	As of 31 December 2025
Individuals registered for TP	33,273	41,049	49,119	55,210
Pending TP applications	1,083	460	395	452
TP beneficiaries	28,908	33,882	39,178	43,300
Tolerated status beneficiaries	923	1,597	1,710	2,903

Source: regarding 2022, data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023; regarding 2023, data received from the National General Directorate of Aliens Policing by the HHC on 19 February 2024; regarding 2024, data received from the National General Directorate of Aliens Policing by the HHC on 19-20 February 2024.; regarding 2025, data received from the National General Directorate of Aliens Policing by the HHC on 9 March 2025.

B. Qualification for temporary protection

Currently, in line with the Council Implementing Decision, Act L of 2025 provides that the following persons may apply for temporary protection:

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

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

⁹ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023.

¹⁰ Data received from the National General Directorate of Aliens Policing by the HHC on 19 February 2024 and 20 February 2025.

¹¹ *Ibid.*

In practice, the Hungarian asylum authority also grants temporary protection to the unmarried partner living in a stable relationship with a person referred to in point a) or b), (although in 2025, the benchmark of sufficient proof of such relationship became significantly more strict, with the NDGAP requiring official documents to prove partnership) and to third-country nationals who are the parents of minors referred to in point a) or b).¹²

When it comes to the interpretation of “dependency”, in the practice of both the National Directorate-General of Aliens Policing¹³ and the courts, a permissive and a restrictive approach may be highlighted.

The notion was interpreted in a restrictive manner in a case where the court upheld the decision of the NDGAP refusing the temporary protection applications of a Russian mother and her daughter, who had lived together in the same household with the mother’s Ukrainian mother for 27 years before fleeing to Hungary, in a property owned by the Ukrainian mother. The court held that “dependency can only be understood as a relationship of responsibility and burden which is complete or close to it, or close to financial dependence, or personal care or nursing which is equivalent in its closeness to full or near-full financial dependence. If merely the emotional attachment, living together and running a household together would suffice as a status for a family member, the EU and national legislator would have provided for this, rather than much stricter dependency-dependency relationship.”¹⁴ The Russian women were later granted temporary protection in 2024, but not for their dependency with their Ukrainian relative, but because of the court holding that there was not any other ‘adequate protection’ available for them apart from temporary protection.¹⁵

Conversely, the NDGAP applied a permissive approach concerning a Belarusian citizen temporary protection applicant, also represented by the HHC.¹⁶ The applicant’s mother is a Belarusian citizen, her half-sibling sister, however, is Ukrainian as she was born from a Ukrainian father. The mother and the applicant lived in Ukraine for more than 20 years, they also got a Ukrainian permanent residence permit in 2017. The sister, since she was born, also lived with her mother and half-brother all her life, in a house that is owned by the applicant. The mother and the sister were granted temporary protection status without any problems, but in the applicant’s case the NDGAP wanted further evidence. The authority accepted that dependency was established between the applicant and the sister, as the sister, who is a minor, had lived in the applicant’s apartment and they had a strong emotional connection too. The Belarusian applicant was consequently granted temporary protection status.

The ‘*direction*’ of dependency is also interpreted by the NDGAP in a permissive manner. The HHC knows of two cases of Nigerian citizen parents, whose children were born in Ukraine and therefore had Ukrainian citizenship, but the NDGAP eventually granted temporary protection not only to the children but to their parents too.¹⁷

Furthermore, it is worth noting that following the litigation efforts of the HHC, the Budapest Court stated that a third-country national family member of a dual (Hungarian-Ukrainian) citizen shall also be granted temporary protection status, notwithstanding the fact that the family member is not entitled to and does not need temporary protection for being a Hungarian citizen. The court argued that the legislator obviously did not want to place the third-country family members of Hungarian citizens who had lived in Ukraine in a less favourable position than the third-country family members of Ukrainian citizens who may be granted temporary protection status under the (then-in-force) TP decree.¹⁸

¹² Practice-based observation by the Hungarian Helsinki Committee, April 2023.

¹³ Hereinafter: NDGAP.

¹⁴ Judgment nr. 11.K.703.874/2022/8 of Budapest Court, 9 January 2023.

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

¹⁶ Case number 106-M-26231/2022 before the NDGAP.

¹⁷ Case number 106-M-6958/2022 before the NDGAP.

¹⁸ Judgment nr 13.K.700.433/2023/7 of Budapest Court, 30 March 2023.

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

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

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

- a. in whose case a court established by a final and binding judgement that they had committed an intentional criminal offence punishable by imprisonment for five or more years;
- b. who are sentenced by a final and binding judgement of a court to imprisonment for having committed a criminal offence as recidivists, multiple recidivists or violent multiple recidivists;
- c. who are sentenced by a final and binding judgement of a court to imprisonment of a term of three years or more for having committed a criminal offence against life, physical integrity, and health, a criminal offence endangering health, a criminal offence against human freedom, a criminal offence against the freedom of sexual life and sexual morality, a criminal offence against public peace, a criminal offence against public safety, or a criminal offence against the order of public administration.¹⁹

The Constitution Protection Office and the National Counterterrorism Centre are the competent expert authorities to determine whether the stay of the applicant in the territory of Hungary presents a threat to national security.²⁰

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

Although the Commission strongly encouraged member states to extend TP to those who fled before 24 February 2022, the Hungarian Government decided not to do so regarding those, who would otherwise belong under the personal scope of the Council Implementing Decision,²¹ but reached the country before the said date. Those who arrived in the country before 24 February 2022 and have no legal basis to stay (e.g., application for or extension of residence permit for a defined purpose) may be subjected to the procedures described below.

Firstly, if the person arrived in Hungary before 24 February, temporary protection applications can be submitted, despite the fact that based on Act L of 2025, the applicant is not eligible for the protection status. According to the experience of HHC lawyers, the authority registers these applications and conducts the TP procedure, but as a result, the application is rejected in an official decision. Nonetheless, the asylum authority, acting under the Asylum Act and Asylum Decree, also holds in these cases that *non-refoulement* is applicable and that the applicant cannot be sent back to their country of origin (Ukraine). Consequently, the asylum authority grants tolerated stay/exile status to these applicants.²² For the duration of the procedure, the applicant is issued with a humanitarian residence permit granting the right to stay and reside in the territory of the country. The same permit, valid for a year, is granted to those who are granted tolerated status.²³ After a year, the status is reviewed by the asylum authority.²⁴ There

¹⁹ Section 21(1) of the Asylum Act.

²⁰ Point a) of Section 2/A. of Government Decree 301/2007. (XI. 9.) on the implementation of Act LXXX of 2007 on Asylum (Asylum Impl. Decree).

²¹ Council Implementing Decision (EU) 2022/382 of 4 March 2022 establishing the existence of a mass influx of displaced persons from Ukraine within the meaning of Article 5 of Directive 2001/55/EC, and having the effect of introducing temporary protection [2022] OJ L 71/1, available [here](#).

²² Sections 25/A-25/B of Asylum Act.

²³ Section 29 (1) b.) of Act II of 2007 on the Entry and Stay of Third-Country Nationals.

²⁴ Section 25/B (2) Asylum Act.

have been no reports suggesting that those receiving tolerated status would have experienced any difficulties regarding the status-review procedure.

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

- ❖ pre-school and are obliged to participate in public education,²⁵
- ❖ be a private entrepreneur,²⁶
- ❖ be employed, but only after obtaining a work permit,²⁷
- ❖ in case they are not insured under the social security scheme, to treatments by a general practitioner, to emergency care, to mandatory vaccinations and to certain epidemics related health care services.²⁸

However, if the person arrived in Hungary before 24 February 2022 and stays without any legal basis, an expulsion procedure might also be initiated either *ex officio* by the NDGAP or by the person's own initiative, if the person presents themselves before the authority.²⁹ In this case, the aliens policing authority would conduct a procedure in which they have an obligation to assess whether *non-refoulement* applies. In case of persons fleeing Ukraine, the aliens policing authority would likely perceive that the principle of *non-refoulement* may be applicable and the person in question may be granted tolerated stay / exile status³⁰ (see above). This procedure is more likely to be conducted for all third country nationals not covered by the personal scope of Act L of 2025, but unable to return to their countries of origin in a safe and durable manner, regardless of the time of their arrival in the country. The situation is as such because Act L of 2025 precludes applying for asylum without going through the embassy procedure.

The HHC in its information requests sent to the NDGAP asked whether, beside a rejection of a temporary protection application and/or asserting the non-applicability of *refoulement*, anyone who applied for temporary protection was issued with an expulsion order. The NDGAP stated in its answer that no temporary protection applicant was expelled throughout 2022-2025 as a result of a negative decision in a temporary protection procedure.³¹

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

Persons recognised as stateless in Ukraine – without having benefited from international or equivalent protection in Ukraine prior to 24 February 2022, as the unfortunate wording of the Council Decision and Act L of 2025 perhaps suggest – are covered by Act L of 2025 and are eligible for temporary protection according to the communication of the asylum authority.³² The personal scope of Act L of 2025 was not broadened to cover additional categories of displaced persons however.

Nonetheless, the Hungarian implementation of the Council Implementing Decision poses some compliance issues regarding third country nationals and stateless persons. Although the Council Implementing Decision requires Member States to provide temporary protection or adequate protection to those stateless persons and third-country nationals, who were legally residing in Ukraine before 24 February 2022 on the basis of a valid permanent residence permit and are unable to return to their country of origin in a safe and durable manner, Act L of 2025 states that “it does not apply the Council Decision”

²⁵ Section 92(1) a.) of the Public Education Act.

²⁶ Section 3(1) d.) of the Private Entrepreneurs Act.

²⁷ Sections 3-6 of Gov. Decree 445/2013. (XI. 28.).

²⁸ Section 44 (3)-(4) of the Asylum Decree.

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

³⁰ Sections 52-52/A of Act II of 2007 on the Entry and Stay of Third-Country Nationals.

³¹ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023 and on 19 February 2024 and 20 February 2025.

³² NDGAP, ‘Tájékoztató az Ukrajnából menekülő ukrán állampolgárok részére’, available in Hungarian [here](#).

with regard to that group of people. According to Act L of 2025, the aliens policing authority shall proceed in line with the general rules in the cases of these individuals.³³ This 'general' procedure can either mean a residence permit procedure or an aliens policing procedure aiming at the person's expulsion but may result in granting tolerated status, as explained in the previous paragraph.³⁴ Neither the residence permit procedure, for which the applicant has to fulfil a long list of conditions (e.g., proven income, health-insurance etc.) nor tolerated stay may qualify as 'adequate protection' within the meaning of Council Implementing Decision.³⁵

In 2025, the HHC represented a Russian national who held a permanent residence permit in Ukraine and applied for temporary protection in Hungary. He submitted a statement with his application stating that he could not return to Russia, due to not having lived there since the age of 9 and expressed strong anti-war sentiments both while living in Ukraine and in Hungary. The asylum authority rejected his application and found that non-refoulement was not applicable in the client's case. With the assistance of the HHC, the client appealed the decision. In his case, the Szeged Court (Szegedi Törvényszék) submitted a request for preliminary ruling to the CJEU to examine whether the Hungarian regulation concerning people with permanent residence permit in Ukraine is in line with the TP Implementing Decision.³⁶

Those third-country nationals who were residing in Ukraine but would be able to return to their countries of origin in a safe and durable manner are likely expelled as a result of an alien policing procedure, should they not be able to obtain a residence permit for a specific purpose.

For the duration of the aliens policing procedure persons are provided with a temporary residence document by the aliens policing authority valid for 1 to 3 months. The rules related to the temporary residence document are laid down in the TCN Act.³⁷ The temporary residence document, with which does not come with any right apart from being able to stay in the country for the time of the procedure, may be extended by a maximum of three additional months at a time, if the person in question is able to prove that travel arrangements to their country of origin are underway or that they made efforts to regularise their stay in Hungary on the long term (such as proceeding with a visa application to another country or a correspondence with a Hungarian University proving that the person wished to obtain a residence permit for a studying purpose). Temporary residence documents are also provided to third-country nationals fleeing Ukraine by the police upon border crossing. The aliens policing authority can later extend these as explained earlier. The NDGAP states that 23,378 temporary residence documents were issued between 24 February 2022 and 31 December 2025.³⁸

In the long term, the regularisation of the residence of non-Ukrainian nationals arriving from Ukraine could be possible only by applying for one of the residence permits set out by the TCN Act (for example, permit for the purpose of studies, employment, family reunification, etc.) if the appropriate legal basis is available to the applicant (for example, he or she is admitted to a university, has a job-offer, etc.) and if they fulfil a long list of conditions (e.g. verifying place of accommodation, means of subsistence, health insurance). Applications for such residence permits must be submitted, as a general rule, at the embassies of Hungary. Until 1 January 2024, applicants could submit a so-called leniency request, asking the authorities to allow them to submit a residence permit application in the territory of Hungary. In 1 January

³³ Section 10(4)-(5) of Act. L of 2025.

³⁴ These procedures are regulated by Act II of 2007 on the Entry and Stay of Third-Country Nationals.

³⁵ Adequate protection as defined in the Commission's document: European Commission, *Communication from the Commission on Operational guidelines for the implementation of Council implementing Decision 2022/382 establishing the existence of a mass influx of displaced persons from Ukraine within the meaning of Article 5 of Directive 2001/55/EC, and having the effect of introducing temporary protection* [2022] OJ C 126/1, available [here](#).

³⁶ C-21/26, *Nazin* case

³⁷ Section 30 of TCN Act.

³⁸ Information received from the NDGAP by the HHC on 9 March 2026. The statement of the NDGAP does not explicitly say that the documents were issued exclusively for third-country nationals, it only says for 'people arriving from Ukraine'.

2024, a new Act on TCNs entered into force.³⁹ Under this law, only nationals of countries whose nationals can enter and stay in the EU for 90 days visa free under Regulation (EU) 2018/1806 can submit an application for residence permit in Hungary.

Summary of available protection and residence statuses for people fleeing Ukraine

As explained in the previous paragraphs, the Hungarian implementation of the EU TP scheme is rather restrictive in terms of eligibility for protection. Apart from Ukrainian nationals, beneficiaries of international protection or stateless persons recognised in Ukraine and their family members, no other groups can access temporary protection. Although it follows from the TPD, the Council Implementing Decision and the Commission's operational guidelines that third-country nationals who are unable to return to their country of origin but are not eligible for temporary protection must be able to access the general asylum procedure, Hungarian law precludes the submission of asylum applications in Hungary, unless the procedure is initiated in **Serbia** or **Ukraine**, by submitting a so-called statement of intent declaration at the Hungarian embassies.⁴⁰ This regulation, in addition to being in breach of international law and European Union law related to persons entitled to international protection in several aspects, as confirmed by the Court of Justice of the European Union in June 2023,⁴¹ has posed serious difficulties within the context of the Ukrainian crisis as well (see [Access to Asylum](#)). Third-country nationals arriving from Ukraine either do not know that they should lodge statement of intent procedure at the Hungarian Embassy in **Kyiv** and wait to be granted leave to enter and come to Hungary, or do not hold the necessary visa to travel to **Serbia**, and therefore, are not in a position to submit a statement of intent at the Belgrade embassy. Even if these individuals have well-founded asylum claims, the 'best' they can get is a tolerated status as a result of an alien policing procedure (see above, same section).

The HHC in its information request sent to the NDGAP asked how many third-country nationals fleeing Ukraine to Hungary and issued with a temporary residence document applied for asylum in Hungary. The NDGAP stated that they do not have data in that regard.⁴²

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

Groups fleeing Ukraine	Protections / Residence status	Is it compliant with the EU TP scheme?
<ul style="list-style-type: none"> - Ukrainian nationals, - Recognised stateless persons and beneficiaries of international protection, - their family members within the council Decision + their partners in a stable relationship, parents of Ukrainian minor <p style="text-align: center;">if arrived on or after 24/02/2022</p>	<p>Temporary protection granted in asylum procedure</p>	<p>Yes</p>

³⁹ Act XC of 2023. on the general rules of entry and stay of third-country nationals

⁴⁰ Chapter 1 of Act L of 2025.

⁴¹ CJEU, 22 June 2023, *European Commission v. Hungary*, C-823/21, available [here](#).

⁴² Information received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023 and on 19 February 2024.

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

All residence permits issued in 2022, 2023 and 2024 were valid until 4 March 2025. As the EU temporary protection was extended, Government Decree No. 343/2024 (XI. 14) also declared the prolongation of the Hungarian TP cards' validity until 4 March 2026 and Government Decree No. 401/2026 (XII 16.) further extended the status until 4 March 2027.

C. Access to temporary protection and registration

1. Admission to territory

Access to the territory of Hungary was generally facilitated at border crossing points in 2022, with the occasional exceptions listed below. In line with the Commission Communication providing operational guidelines for external border management to facilitate border crossings at the EU-Ukraine borders,⁴³ the application of entry bans/SIS alerts on prohibition of entry and stay in the EU has been suspended on the Ukrainian-Hungarian border and people could enter without adequate travel documents in 2022.

The situation of persons fleeing Ukraine but trying to enter the Schengen area via Hungary at Romanian-Hungarian border-crossing points, however, was not as clear-cut. The HHC received information on multiple occasions between 24 February 2022 and August 2022, that Ukrainians without biometric passports or third-country nationals, even holding a Ukrainian residence permit, were not allowed to enter

⁴³ Commission Communication Providing operational guidelines for external border management to facilitate border crossings at the EU-Ukraine borders 2022/C 104 I/01 [2022] OJ C 104I/1, available [here](#).

Hungary. This practice was, nonetheless, rare and not consistent. In the second half of 2022, no organisations contributing to this report received such information.⁴⁴ In 2023-2024, only those fleeing Ukraine could enter Hungary from Romania, who had valid Ukrainian biometric passports or a document issued by other Schengen state confirming that the person may enter that state.⁴⁵ The Police states that in 2024 in case of 300 Ukrainian nationals, entry was denied for unspecified reasons.⁴⁶ Since 1 January 2025, Romania fully became part of the Schengen area, thus border control between Romania-Hungary no longer exists.

However, since January 2023, border-control measures have been strengthened. The National Police Headquarter in its answer received by the HHC on 27 March 2023 asserts individuals in the following situation will be granted entry:

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

The Police Headquarter also stated in its answer that if need for asylum or temporary protection is indicated when crossing the border, ‘when assessing *refoulement*, this need has to be indicated to the NDGAP’. The Police furthermore stated that ‘if *non-refoulement* applies, the person is to be transferred to the **Nyírbátor** collection point and further procedure is then to be conducted by the NDGAP’. ‘Outcome is uncertain as the NDGAP’ – and not the border police – ‘decides if the status is granted or the person is returned to Ukraine’. The letter furthermore asserted that ‘if *non-refoulement* does not apply, then the person claiming must be directed to the Kiev Embassy of Hungary’. According to the HHC’s experience, these unwritten standards were mostly applied in 2025 as well.

The Police states that 1,538 persons were denied entry at the Ukrainian-Hungarian border in 2023, 461 in 2024 and 259 in 2025. In 2025, 7 persons were denied entry for lacking valid travel documents, 75 persons for lacking valid visa, 81 persons for missing “supporting documents”, 8 persons for overstaying, 1 person for not having sufficient financial means, 8 person for being subjected to a “national” an entry ban pertaining to the territory of Hungary and 79 persons for being subjected to an entry ban in the SIS system.⁴⁷ Out of the 259 persons, 57 were Ukrainian nationals. 52 of them were denied entry because of an entry ban in SIS, 4 persons for having a “national” entry ban and 1 person for the lack of “supporting documents”.

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

⁴⁴ The following organisations contributed to this report: IOM Hungary, Caritas Hungary, Cordelia Foundation, Evangelical Lutheran Diakonia, Jesuit Refugee Service, Hungarian Interchurch Aid, Hungarian Maltese Charity, Hungarian Reformed Church Aid, Menedék Hungarian Association for Migrants, and Next Step Hungary Association, Hungarian Red Cross, Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI).

⁴⁵ Information received by the HHC during its February 2023 monitoring mission.

⁴⁶ Information received from the Police Headquarter on 20 February 2024 by the HHC.

⁴⁷ Information received from the Police Headquarter on 19 February 2024, 20 February 2025 and 9 March 2026.

were likely to face difficulties in re-entering Hungary. In 2024, and 2025 no such occurrence was recorded by the HHC.

2. Freedom of movement

Ukrainian nationals with biometric passports are not issued with any kind of additional residence documents by the authorities upon their entry to Hungary. Ukrainians without biometric passports and third-country nationals are, however, provided with a temporary residence document valid for 1-3 months, until their residence status is otherwise settled or until they leave the country. According to the NDGAP, between 24 February 2022 and 31 December 2025, 23,378 temporary residence documents were issued.⁴⁸ The NDGAP, upon the person's arrival issues this document on humanitarian grounds,⁴⁹ but in the early phase of the crisis this document was also issued by the police at border crossing points and registration points (set up close to the border with the specific purpose of registering people from Ukraine who did not hold a biometric passport).

Furthermore, in the experience of the HHC, Hungary did not follow the EC's recommendations⁵⁰ indicating that if there is no biometric passport but the person is entitled to temporary protection and wants to move to another Member State other than the first Member State, then a Member State might issue 15-day Schengen visa, persons wishing to travel further normally turned to the consulates of the targeted Member States and requested visas there. Third-country nationals not entitled for temporary protection generally did the same, especially in cases when they wanted to reach EU countries where the personal scope of temporary protection was broader and covered third-country nationals too.

3. Registration under temporary protection

The application for temporary protection has to be submitted to the asylum authority (NDGAP)⁵¹ in an official application form⁵². There is no deadline to apply for temporary protection after arriving in Hungary, however, if applicants want to access state-funded accommodation, it is advisable to apply within 30 days (see more on this under [Housing](#)). The application may be submitted at any asylum client services of regional offices⁵³ of the authority. In Budapest, it is to be lodged at 60 Budafoki Street, 11th District. Case-officers at the client services provide applicants with the application form. In addition, it is possible for applicants to give their personal identification data necessary for the submission of the application in advance by using the website⁵⁴ or mobile application⁵⁵ of the NDGAP for that purpose.⁵⁶ That possibility only exists to accelerate the procedure and does not exempt the applicant from the obligation to appear in person before the authority, which, in this case, may be fulfilled not only by showing up at the mentioned offices of NDGAP, but also at any government client service point ("Kormányablak").⁵⁷

It must be demonstrated upon submitting the application that the applicant falls within the personal scope of the Council Implementing Decision/TP Decree. In line with the EC communication, this might be done usually by presenting a passport, a personal identity card, any other document appropriate for the

⁴⁸ Information received from the NDGAP on 20 February 2025 by the HHC.

⁴⁹ Section 30 (1) f.) and j.) of TCN Act.

⁵⁰ Communication from the Commission on Operational guidelines for the implementation of Council implementing Decision 2022/382 establishing the existence of a mass influx of displaced persons from Ukraine within the meaning of Article 5 of Directive 2001/55/EC and having the effect of introducing temporary protection (2022/C 126 I/01).

⁵¹ Section 32/D (1)-(2) of Asylum Act.

⁵² Application form may be downloaded from [here](#).

⁵³ The regional offices of the NDGAP are listed at NDGAP, 'Területi szervek illetékességi területe és címjegyzéke', available in Hungarian [here](#).

⁵⁴ The NDGAP website to submit applications is available [here](#).

⁵⁵ The NDGAP mobile application is available [here](#).

⁵⁶ Section 16 (1) of Act L of 2025.

⁵⁷ (Sections 16 (2)-(4) of Act L of 2025.

certification of personal identity, or, especially for family members, by an extract from the birth or marriage certificate substantiating family relationship.

As per the practice of asylum authority, unmarried partners of persons eligible for temporary protection may also be granted temporary protection. Partners have to evidence the relationship by submitting photos, email, SMS, other correspondence with the temporary protection-eligible partner. In 2025, HHC lawyers encountered multiple cases where NDGAP required unmarried partners to prove their relationship with official documents. In one case, a Ukrainian document certifying that a Ukrainian national and their unmarried partner shared the same address in Ukraine was not considered sufficient to substantiate the existing partnership.

If the applicant holds valid travel or ID documents, the submission of the application is quite fast, without the case-officer asking additional questions.

The law also provides that the applicant is only to be heard if it is absolutely necessary for further clarification.⁵⁸ This is the case, for instance, when the applicant lacks any document sufficient for personal identification, as then the applicant might have to answer some additional questions or submit other evidence substantiating their identity.

If, at the time of submitting the application, the applicant has no accommodation, that fact may be noted on the application form. In such cases, the applicant has to request accommodation separately at the Government Office at the Western Railway Station (Nyugati Pályaudvar, 1062, Budapest Teréz körút 55.) (see more on this under [Housing](#)). If the applicant has accommodation, the address must be given on the data sheet, and in case their accommodation changes during the procedure, the authority must be duly notified thereof.

The asylum authority does not adopt a separate decision about the recognition of temporary protection. The authority only records the recognition itself and notifies the applicant by handing over or posting the temporary protection document.⁵⁹ Rejected applicants are informed that their attempt was unsuccessful only if they contact the authority in person to request information about the assessment of their application.

The asylum authority has 45 days to conduct the procedure.⁶⁰ The time-limit set for the procedure of the expert authority⁶¹ (see [Qualification for temporary protection](#)) shall be 10 days, therefore, the maximum duration of the procedure is 55 days. If the expert authority does not notify the asylum authority of its decision within 10 days, its consent is considered as given.⁶²

Following the submission of the temporary protection application, applicants receive a so-called humanitarian residence permit for the duration of the procedure.⁶³ The permit certifies their entitlement to the services available for them during the temporary protection procedure (see [Residence Permit](#)). If the humanitarian residence permit expires before receiving the temporary protection document following the recognition, the extension of validity may be requested at the closest regional office of the NDGAP asylum-client service.

Following recognition as a beneficiary of temporary protection, a document is issued to the beneficiary for the purposes of personal identification and certification of the right to residence (temporary protection card). The authority sends/delivers a letter along with the temporary protection card notifying the beneficiary that the card does not entitle its holder to travel and that the subsistence allowance – the only

⁵⁸ Section 14 (2) of Act L of 2025.

⁵⁹ Section 16 (6) of Act L of 2025.

⁶⁰ Section 77 (3) of the Asylum Act.

⁶¹ The Constitution Protection Office and/or the National Counterterrorism Centre.

⁶² Section 15 (2)-(3) of Act L 2025.

⁶³ Section 29(1) c.) of the TCN Act and Section 6 (1) b.) of the Asylum Decree.

financial support provided to beneficiaries by the state – can be requested after receiving the card. If, following the issuance of that document, the place of residence of the beneficiary of temporary protection changes, the authority must be duly notified thereof.⁶⁴

If the temporary protection application is submitted, and as a result of the procedure the asylum authority denies the protection claim and potentially expels the applicant, the refusal decision might be challenged before the regional court within 8 days from its delivery.⁶⁵ In the judicial review request, *non-refoulement* opinion and a potential expulsion decision might also be challenged. The court then has 60 days to decide in the case,⁶⁶ whether to refuse the appeal or order the asylum authority to conduct a new procedure.⁶⁷ The judicial review request does not have an automatic suspensive effect on the decision⁶⁸, but in practice the expulsion procedure never starts beforehand.

According to the asylum authority, 29 judicial review requests challenging the decision made as a result of a temporary protection procedure until 31 December 2022 were submitted.⁶⁹ In 2023, the number of judicial requests submitted was 21, in 2024, this number was 8 and in 2025 it was 3.⁷⁰ Neither the asylum authority, nor the National Office for the Judiciary could provide data as to the outcome of the judicial review procedures.

Interestingly, when refusing the temporary protection application, the Asylum Act does not preclude the submission of a subsequent application as it does regarding general asylum claims. As a consequence, even if the factual basis of the application and circumstances of the applicant did not change, another application can be submitted and the authority has to make a new – presumably – refusing decision. However, as a result of a 2024 legislative change, if a person's temporary protection application is rejected and remedies are exhausted, the applicant will no longer be entitled to emergency accommodation and care for the duration of the new (repeated) procedure.⁷¹

Referral mechanism and information at entry points

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

However, the Menedék Association reported that the NDGAP is prepared to help people who arrive at Hungary irregularly in order to avoid military conscription in Ukraine. Such people are transported to a registration point in Nyírbátor, where they are given a temporary residence document.⁷²

Lack of interpretation

In the experience of HHC lawyers, the greatest problem hindering registration of temporary protection applications in the first two years of the crisis was the lack or shortage of interpreters present at the asylum client services countrywide, with the exception of **Budapest** client services, where at least one Russian-speaking administrator is always present. In 2024, and 2025 this problem has not been widely reported, except by the Hungarian Interchurch Aid.⁷³

⁶⁴ Section 22(1) a.) of the Asylum Act.

⁶⁵ Sections 68 (1) and 79 (2) of Asylum Act.

⁶⁶ Section 68 (2) of the Asylum Act.

⁶⁷ Sections 88-89 of the Code on Administrative Litigation.

⁶⁸ Section 39 (6) of the Code on Administrative Litigation.

⁶⁹ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023.

⁷⁰ Information received from the NDGAP by the HHC on 19 February 2024 and on 20 February 2025 and on 9 March 2026.

⁷¹ Sections 11 (5)-(6) of Govt. Decree 196/2025 (VII.8.)

⁷² Information received from the Menedék Association by the HHC on 4 February 2026.

⁷³ Information received from the Hungarian Interchurch Aid by the HHC on 11 February 2025 and on 9 January 2025

Access to registration of TP application and length of the procedure

Compared to previous years, in the experience of HHC lawyers the asylum authority refused to register and take over most of the applications, even of those who did not seem to be 'instantly eligible' within the meaning of the TP Decree. Such a problem only occurred with third-country nationals in 2025. The lawyers' experience showed that once the applicants were accompanied by their legal representative, the case-officers of the asylum authority registered the applications.

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

In 2023 and 2024, substantive delays in conducting the temporary protection procedures have not been frequently reported. This may be attributed to the fact that the number of TP applications submitted in 2023 and 2024 were around 25,000 fewer than the year before. The number of NDGAP case-officers assessing applications decreased, however, from 16 to 8 by 2024 and their number remained 8 also in 2025.⁷⁴ In 2025, Diakonia reported delays in the temporary protection procedure.⁷⁵ In the experience of the HHC, the people were generally able to access the temporary protection procedure throughout 2024 and 2025.

Menedék Association pointed out that the main obstacles to apply for temporary protection in 2025 were the lack of information and the illiteracy of the applicants.⁷⁶

4. Legal assistance

Act L of 2025 precludes the application of the provisions of the Asylum Act, according to which applicants are to be provided with the possibility of legal assistance or access to free legal aid in case of need, according to the rules set out in the Act on Legal Aid or by an NGO registered in legal protection.⁷⁷ This does not mean that temporary protection applicants cannot have legal assistance in the procedure, but that the state is not required to provide legal aid upon the applicant's request, as is the case in general asylum procedures.

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

Most of these actors set up a dedicated phone number for hot-line and email addresses, operated by Ukrainian or Russian-speaking staff members or with their help. The assistance providers made their information materials available on their websites. The UNHCR and the IOM were constantly present in the border area after 24 February 2022 and the HHC monitors it on bi-weekly to monthly basis throughout 2022-23. By 2024, the presence of these actors became *ad hoc* and it remained the same in 2025.

⁷⁴ Information received from the NDGAP by the HHC on 20 February 2025 and on 9 March 2026.

⁷⁵ Information received from Diakonia on 24 February

⁷⁶ Information received from the Menedék Association by the HHC on 4 February 2026.

⁷⁷ Section 4(1) c.) of the TP Decree precludes the application of Section 37 (3) of Asylum Act.

In 2025, In-person legal assistance in **Budapest** is available in the offices of the HHC and Menedék Association, if there is a need for legal representation in the temporary protection or following judicial review procedures, it has been provided by attorneys and lawyers of the HHC.

IOM operated a toll-free hotline offering information in Ukrainian, Russian, English, and Hungarian on rights and obligations in Hungary, Temporary Protection, safety and protection risks including exploitation and trafficking, access to temporary accommodation, and referrals to health, psychosocial, legal, and other essential service.⁷⁸

Between 24 February 2022 and 31 December 2025, the HHC assisted 7,374 people in person, responded to 3,811 emails, 2,033 phone calls and 986 social media messages coming from people who fled Ukraine, predominantly seeking legal help.⁷⁹

5. Information provision and access to NGOs

According to the Asylum Act, the asylum authority is to inform the applicant on their procedural rights and obligations and the consequences of breaching these obligations. This is to be done when the applicant submits the application, in a written form, in the native language of the applicant or in one which is otherwise understood by the applicant.⁸⁰ Although the Asylum Act would normally require the authority to record the fulfilment of this obligation in the minutes,⁸¹ Act L of 2025 precluded the application of this provision in temporary protection procedures.⁸² In the experience of the HHC, no such written information is provided to the applicants when they lodge the application. If there is no language barrier or interpreters are present, the case-officers of the asylum client services normally provide information to applicants in person, informing them about the expected duration of the procedure and on the communication of the decision. Furthermore, the Asylum Act provides that upon communicating the decision on recognition, the authority has to inform the beneficiary of their rights and obligations.⁸³ The Asylum Decree also requires the authority to inform the beneficiary in a written form of the available services and financial support to which they are entitled when delivering the decision. The information must be provided in the native tongue of the beneficiary or in a language they understand.⁸⁴ In line with Ac L of 2025, however, the authority does not adopt a separate decision about recognition and only records the recognition itself and notifies the applicant by handing over the temporary protection document.⁸⁵ The asylum authority partially complies with the referred provision of the Asylum Act. Along with the TP card, a letter is sent informing the beneficiary that the card does not entitle its holder to travel and that receipt of the card renders its holder eligible to request the regular subsistence allowance at the competent district office. In this regard, the beneficiary is also informed that they have an obligation to register at the district office by the last day of each month during the period of temporary protection. There is no information in the letter about how to access other services which a beneficiary is entitled to (healthcare, education, travel discount etc.). This is contrary to Article 9 of the Temporary Protection Directive providing that 'Member States shall provide persons enjoying temporary protection with a document, in a language likely to be understood by them, in which the provisions relating to temporary protection and which are relevant to them are clearly set out.'

The HHC turned to the NDGAP requesting information on how the authority complies with its obligation concerning information provision. The NDGAP answered that the TP Decree (Gov Decree 86/2022 (III. =.), in force at the time of the information request) was a *lex specialis* to the general rules set out in the

⁷⁸ Information received from IOM on 27 January 2026.

⁷⁹ See: <https://helsinki.hu/en/ukr/>.

⁸⁰ Section 37 (1) of Asylum Act.

⁸¹ Section 37 (2) of Asylum Act.

⁸² Section 14 (1) c.) of Act L of 2025.

⁸³ Section 79 (3) of Asylum Act.

⁸⁴ Section 38(1) of Asylum Decree.

⁸⁵ Section 16 (6) of Act L of 2025.

Asylum Act and Decree, thereby, it did not apply Section 38(1) of the Asylum Decree that was relevant regarding this obligation.⁸⁶ The TP Decree, however, did not preclude the application of the said section, thus, the authority should comply with it. The NDGAP furthermore stated that beneficiaries receive information when they receive their temporary application form in the client services and also that information is available on their website. Information provision is, however, insufficient and on the website some relevant information is only available in Hungarian and English.

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

On a positive note, a state hotline was quickly set up by the government in March 2022, providing information in Ukrainian, Hungarian and English on basic issues relating to temporary protection procedure, entry, individual situations.⁸⁷ A dedicated email address was also set up for the same purpose. The officers, however, were not really up-to-date as the hotline did not belong to NDGAP, they had to make inquiries to the NGDAP themselves. In the HHC's experience, they could answer straightforward questions but were professionally not prepared to answer more complex ones and had no information on resolving more complicated legal situations. As to the emails, information was sometimes quickly and efficiently provided, but other times no response arrived. In December 2023, the Government launched the Safe in Hungary portal.⁸⁸ The website offers information on TP, assistance and services, on the legal status of dual nationals (Ukrainian – Hungarian) and emergency contacts in multiple languages. The website operated throughout 2024 and 2025 with information available on the topics mentioned, and on legal changes occurring during the year.

D. Guarantees for vulnerable groups

There are no specific identification mechanisms in place in Hungary to identify vulnerable individuals under the temporary protection scheme. Notably, there has been no comprehensive screening for people with special protection needs.⁸⁹

In its information request sent to the NGDAP, the HHC asked how many individuals fleeing Ukraine to Hungary were identified as vulnerable by the relevant authorities and concerning the years 2022 - 2025. Worryingly, the NGDAP stated they had no data in that regard.⁹⁰

People with disabilities

In the experience of the HHC, people with disabilities have been frequently placed in shelters without reasonable accommodation that are not appropriate to their needs, lacking the necessary medical/psychological assistance. This has been a constant issue since the beginning of the crisis. In 2023, the HHC recorded a concerning number of accommodation sites in which the situation of those requiring medical assistance due to their disability or mental/physical health was not addressed. In the border area, people with disabilities were accommodated in the out-of-use buildings and storage facilities of nursing homes and elderly homes, with only the most basic care, where their physical and medical needs were not fully met. The staff of these institutions had to take care of them on top of their regular workload and thus have limited capacity to care for them.⁹¹ It was also reported that some accommodation

⁸⁶ Letter received from the NDGAP's asylum department by the HHC on 16 June 2022.

⁸⁷ Official press release in English: [here](#). Phone numbers from HUN (free of charge): 06 80 310 310, from Ukraine: 0 800 504 546, from abroad: +36 1 550 1828, E-mail: menekultinfo@me.gov.hu

⁸⁸ Available [here](#).

⁸⁹ UNHCR, *Inter-Agency Operational Update Hungary*, 10 May 2022, available [here](#).

⁹⁰ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023 and 19 February 2024 and 20 February 2025 and on 9 March 2026.

⁹¹ The HHC recorded these cases on 18-19 June and 12-14 November 2023 during its monitoring mission.

sites were unwilling to take people with disabilities in in 2023.⁹² Individuals with disabilities receive no additional support (logistical or monetary) from state actors, which is very burdensome not only for the persons of concern, but also for the facilities hosting them.⁹³ The UNHCR also reported: “despite seemingly equitable access to TP status, households with a member with disability report more frequently unmet needs, around healthcare, implying heightened vulnerability compared to other households. As expected, households with persons with disability exhibit a significantly higher reliance on social protection benefits. It is important to mention is that refugees with disabilities in Hungary do not have access to government disability grants as Hungarian citizens.”⁹⁴

There have been no such occurrences reported concerning 2024. Since 1 August 2024, the system of state-sponsored accommodation provision (see more on this under [Housing](#)) was fundamentally modified. Since then, the HHC has no information about where and how people with disabilities, eligible for state-sponsored accommodation, are placed. In 2025, Cordelia reported about an accommodation site in Hódmezővásárhely where elderly people (often living with dementia) and persons with chronic illnesses, including locomotory disability were placed. The Cordelia Foundation noted that these people were left in a vulnerable state while unable to return to Ukraine.

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

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

The HHC recorded one occasion in 2024 when people who fled Ukraine and were accommodated in Ercsi complained that they had problems finding permanent jobs, as they are mostly hired for casual labour. Recently, the men residing at the said accommodation site did not receive enough money for their work, they basically had to work for free for a week.⁹⁵ The Hungarian Interchurch Aid also reported that many of those people from Ukraine who turned to them informed them that they often had to work for free, in dire conditions or without a contract.⁹⁶ In 2025, the HHC knew multiple persons and families unable to access housing due to the severe restrictions in eligibility of state-sponsored accommodations in 2024 and were forced to undertake employment for housing. This usually meant that they did not receive a salary, or just a very low amount, and simply worked in exchange for accommodation.

Unaccompanied and separated children

There have been no special procedures adapted specifically to the needs of UAMs who are entitled to temporary protection. Government Decree 196/2025 (VII. 8.) even excluded the application of some procedural guarantees concerning UAMs provided by the Asylum Decree.⁹⁷ Accordingly, if an UAM is to be heard in a temporary protection procedure, which is unlikely in practice but possible by law, they may be heard without their legal representative or guardian being present and without other guarantees prevailing (e.g., interview in a child-friendly environment).

⁹² The HHC recorded this case on 9 October 2023 in Dunaújváros during its monitoring mission.

⁹³ The HHC recorded this on 31 July - 1 August 2023 during its monitoring mission.

⁹⁴ UNHCR, Hungary: Multi-Sector Needs Assessment, December 2023, available [here](#).

⁹⁵ Case registered by the HHC in April 2024 in Ercsi during HHC's monitoring mission.

⁹⁶ Information received from the Hungarian Interchurch Aid by the HHC on 7 February 2025.

⁹⁷ Section 2(2) g.) of Government Decree 196/2025 (VII. 8.) excludes the application of Sections 74-76 of Asylum Decree.

The most worrisome deficiency of the authority's practice regarding UAMs has been the fact that the appointment of guardians has been frequently absent. Based on the Asylum Act, if the applicant is an UAM, the authority is to arrange their temporary accommodation and the appointment of a child protection guardian.⁹⁸ In this case, the asylum authority must decide the UAM's case in a prioritised procedure.⁹⁹ The Asylum Decree furthermore provides that UAMs under the age of 14 must be accommodated within the child protection system.¹⁰⁰ In case of UAMs who are 14 years old or older, the authority is obliged to notify the district office in order to provide the UAM with a legal representative and case guardian.¹⁰¹

However, in the HHC's experience, the asylum authority enforced none of these guarantees. This worrying practice led to UAMs alone or under the care of persons not related to them at accommodation sites, without being transferred to the official children's care facility. In the experience of the HHC, this phenomenon was present throughout 2022 but was not prevalent in 2023. Since in 2024 and 2025, the HHC could not undertake regular monitoring activities, there is no information about the prevalence of this problem in these years.

In its information request sent to the NGDAP the HHC asked the number of registered temporary protection beneficiary UAMs. Worryingly, the NGDAP stated they had no data in that regard, neither for the year 2022 nor for 2023 and 2024 and nor for 2025¹⁰² According to the Directorate General for Social Affairs and Child Protection, the Károlyi István Children's Centre - where unaccompanied minors are officially accommodated - had a total of 14 minors with temporary protection status registered as beneficiaries on 31 December 2025.¹⁰³

Roma people

Lastly, the situation of Roma people fleeing Ukraine has to be mentioned, as these people, attributed for their ethnic origin, had to face additional difficulties and hardship during their reception in Hungary, which are not anyhow counterbalanced by appropriate guarantees built in the national protection scheme. The HHC reported that throughout 2022 the Roma had to face some issues relating to accessing protection, accommodation, and other protection-related services. In some cases, there were complaints relating to discrimination, incidents of hate crime, and segregation.¹⁰⁴

In 2023, in Pomáz and Érd, healthcare providers were behaving in a discriminatory manner towards the Roma people accommodated in these towns. While the same healthcare provider assisted ethnic Ukrainians, they refused to provide the same services for the Roma accommodated at the same sites as the Ukrainians.¹⁰⁵ At the Gyöngyös accommodation site most of the people are of Roma origin and they claimed that there was a discriminatory attitude towards them from potential employers, especially if it turned out that they were illiterate, even if no reading/writing skills were needed for the work.¹⁰⁶ UNHCR's multi-sectoral needs assessment also found that amongst beneficiaries of temporary protection, those of Roma origin faced discriminatory attitudes from potential employers.¹⁰⁷

⁹⁸ Section 36(6) of Asylum Act.

⁹⁹ Section 36(7) of Asylum Act.

¹⁰⁰ Section 33 (4) of Asylum Decree.

¹⁰¹ Section 99/F (1) of Asylum Decree.

¹⁰² Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023, 19 February 2024 and 20 February 2024 and on 9 March 2026.

¹⁰³ Information received from the Directorate General for Social Affairs and Child Protection by the HHC on 20 February 2024 and on 28 January 2026.

¹⁰⁴ The experience of the HHC is summarised in that regard in a thematic paper called 'The Situation of Romani Refugees Fleeing Ukraine: Experiences gathered in the framework of the Ukraine refugee crisis response of the Hungarian Helsinki Committee', April 2023, available [here](#).

¹⁰⁵ Cases registered by the HHC on 18 September and 14 December 2023 in Érd and Pomáz during HHC's monitoring mission.

¹⁰⁶ Case registered by the HHC on 13 July 2023 in Gyöngyös during HHC's monitoring mission.

¹⁰⁷ UNHCR, Hungary: Multi-Sectoral Needs Assessment, Final Report, December 2023, available [here](#), 12.

No such reports have been registered by the HHC concerning 2024, although it is worth mentioning that the 2024 legislative amendments in relation to withdrawal of State-subsidized housing concerned mainly the Roma population arriving from the Transcarpathia region and it continued to impact them in 2025 as well. More information on this can be further found in the housing chapter.

Psychological assistance of vulnerable people in need

There have been non-State coordinated programmes introduced to address the needs of individuals suffering from mental health problems. This type of assistance was also arranged mainly by NGOs. Special bio-psycho-social assistance to people fleeing Ukraine is provided by the Cordelia Foundation country-wide. Their psychologists and psychiatrists provided assistance to 168 persons suffering from mental health problems in 2025 in Budapest, but they also conducted regular visits to people accommodated at Fót and Hódmezővásárhely.¹⁰⁸ In 2025, the Jesuit Refugee Service provided psychosocial support and mental wellbeing programmes in Budapest and other cities (Dorog, Érd, Esztergom, Göd, Gyál, Győr, Órbottyán).¹⁰⁹ Caritas Hungary, the Hungarian Interchurch Aid, IOM, Menedék and Strázsa Tanya reported to have provided psychological assistance, most of them in Budapest in 2025.¹¹⁰

¹⁰⁸ Information received from the Cordelia Foundation by the HHC on 4 February 2026.

¹⁰⁹ Information received from the Jesuit Refugee Service by the HHC on 9 March 2026.

¹¹⁰ Information received from Caritas Hungary by the HHC on 14 January 2026 and from the Cordelia Foundation by the HHC on 4 February 2026.

Content of Temporary Protection

A. Status and residence

1. Residence permit

Indicators: Residence permit

- | | |
|--|--------------------|
| 1. What is the duration of residence permits granted to beneficiaries of temporary protection? | Until 4 March 2027 |
| 2. How many residence permits were issued to beneficiaries from the activation of the Temporary Protection Directive until 31 December 2025? | 49,151 |

Following recognition as a beneficiary of temporary protection, the NDGAP sends the temporary protection card (hereinafter: residence card or TP card) normally by post, or, if the beneficiary cannot be found under the address they gave to the authority upon application, the card is to be collected at the asylum client service where the applicant made their application or at the Budapest client service. As explained under Registration under Temporary Protection, the authority does not make a separate act on the recognition but materialises the positive decision by sending the temporary protection card. Therefore, the deadline by which the procedure is to be conducted (55 days) is the legally required duration within which the TP card is to be received. In 2025, no substantive delays in issuing the TP card were observed.

All residence permits issued in 2022 were valid until 4 March 2023. As the EU temporary protection was extended, 58/2023 Government Decree (II.28) also declared the prolongation of the Hungarian TP cards' validity until 4 March 2024. Most recently, the 343/2024 Government Decree (XI. 14) declared the prolongation of the Hungarian TP cards' validity until 4 March 2026. One of the most worrying issues in 2023 was precisely that, although the government extended the validity period of TP cards and they had to be considered valid by law, as the cards were not replaced with new ones showing the new validity period, many external actors and (e.g., health-care service providers) believed that the temporary protection status was no longer valid and thus denied the enjoyment of rights connected to the temporary protection status.¹¹¹ This caused general confusion among TP beneficiaries too and many believed that their status was no longer valid and they had to submit a new application. In the experience of the HHC and the Menedék Association, this has confused authorities and health care providers too, which thus questioned beneficiaries' eligibility to services. This issue was prevalent in 2024 and 2025 too.¹¹²

There is only one right which is connected solely to the possession of the TP card in practice. According to Government Decree 196/2025 (VII.8.) and Act L of 2025, the beneficiary of temporary protection is entitled to a subsistence allowance.¹¹³ This also means that during the procedure, the applicant cannot receive the subsistence allowance. However, in the absence of a formal decision on recognition, TP beneficiary status can be substantiated by holding a TP card. As explained earlier, a letter is sent along the TP card informing the beneficiary that they can request the subsistence allowance at the Government/District office.

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

¹¹¹ The HHC recorded numerous such cases, e.g., on 11-12 May 2023 in Ráckeve and Demjén Albertmajor, 27 March 2023 in Szentes, 13-14 March in Beregsurány.

¹¹² Information received from the Menedék Association by the HHC on 21 February 2025.

¹¹³ Section 17 of Govt. Decree 196/2025 (VII.8.); Section 22 of Act No. L of 2025.

Benefits	Applicant	Beneficiary
Accommodation, meals, hygienic services	<p>Section 22(1)c.) of the Asylum Act; Section 21(1)a.) and Section 101 of the Asylum Decree, Sections 11-13 of Gov Decree 196/2025 (VII. 8.)</p> <p>(The assessment by the authority under Sections 16(4) -19 of the Asylum Decree shall be excluded under points (c)-(d) of Section 2(5) of Gov. Decree 196/2025 (VII. 8.)</p>	<p>Until 1 August 2023, based Section 41 (2) of the Asylum Decree, beneficiaries were entitled to accommodation and care. Since then, however, the provision is non-applicable as a result of a legislative change.¹¹⁴ Thus, it is unclear if there is a national legal ground based on which accommodation and care (meals) are to be provided, although Section 32(2) of the Asylum Act, not having been overridden by the legislative change, provides for the material reception conditions for beneficiaries “in need” . This situation is presumably the result of inconsistent legislation. In practice, those beneficiaries, after whom the accommodation provider is entitled to receive state allowance, are provided with meals 3 times a day at the accommodation site. On 28 June 2024, the government further restricted access to state-funded mass shelter of beneficiaries of temporary protection. The decree came into full effect on 21 August 2024 and amended Gov. Decree 104/2022 (III.12) and prescribe that only vulnerable beneficiaries of temporary protection who resided in a “territory impacted by war” remain eligible for state-funded mass shelter. In 2025, the same regulation was transposed to Gov. Decree 196/2025 (VII. 8.)</p>
Health care	<p>Sections 26-28 of the Asylum Decree Section 3 of Gov. Decree 916/2025 (VII.8.): specialised oncological care, examinations and medical treatment within the framework of health services related to other chronic illness</p> <p>Section 36/D of Act XLVII of 1997 on the use and protection of healthcare data and health-related personal data. (IV. 29.) – on the practical arrangements of receiving health care</p>	<p>Section 37/A(1)b.) and Section 44(2) of the Asylum Decree;</p> <p>Section 3 of Gov. Decree 916/2025 (VII.8.)Section 36/D of Act XLVII of 1997 on the use and protection of healthcare data and health-related personal data</p>
Education	<p>Section 29 of the Asylum Decree Section 92 (1) a.) and (3) of Act CXC of 2011 on Public Education</p>	<p>Section 37/A(1)c.) and Section 45 of the Asylum Decree;</p> <p>Section 24 of Act No. L of 2025. (preschool and childcare services)</p> <p>Section 92 (1) a.) and (3) of Act CXC of 2011 on Public Education</p>
Free meals for children	<p>Section 24 of Act No. L of 2025. on request, for six months, if care-taker’s income is below 173.000 HUF</p>	<p>Section 24 of Act No. L of 2025. On request, for six months, if care-taker’s income is below 173.000 HUF</p>

¹¹⁴ Gov. Decree 337/2023 (VII.24.) amending the TP Decree by adding Section 5(4) providing that “Section 41(2) of the Asylum Decree shall apply with the exception that the beneficiary of temporary protection shall not be entitled to accommodation and care at the reception centre.”

Regular subsistence allowance (22,800 HUF - (around EUR 55) per adult/month and 13,700 HUF per child/month (around EUR 30))	-	Section 37/A (1)e.) and Section 37/A (4)b.) of the Asylum Decree; Section 17 of Govt. Decree 196/2025 (VII.8.); Section 22 of Act No. L of 2025 BUT Section 21(2): persons shall be obliged to accept the job offered to them within 45 days following the first payment of subsistence allowance. The allowance is subject to a monthly appearance in person before the district office. The entitlement to allowance shall cease in case of employment or pension.
Travel allowances	Section 24 of the Asylum Decree	Point (c) of Section 37/A(2) and Section 48 of the Asylum Decree. It must be requested from the asylum authority [Section 48 (2)]
Bearing the costs of public funeral	Section 25 of the Asylum Decree	Section 6 (2a) of the Asylum Decree ¹¹⁵
Reimbursement of document translation costs	Section 3(2) of Gov. Decree 196/2025 (VII. 8.) Section 49 of the Asylum Decree; documents issued before the recognition as beneficiary of temporary protection, especially extracts from birth or marriage register, certificates of education or vocational training	Section 37/A (3)b.) and Section 49 of the Asylum Decree
Employment	Section 20 of Act No. L of 2025. – No special permit is necessary for the employment Public employment: Section 21 of Act. No. L. of 2025.	Section 20 of Act No. L of 2025. – No special permit is necessary for the employment Public employment: Section 21 of Act. No. L. of 2025. Act CVI of 2011
Facilitating final departure from the country	-	Section 37/A(3) c.) of the Asylum Decree
Family Reunification		Section 105 of the Asylum Decree: If the family member was awarded temporary protection in another Member State, family reunification may be requested
Reimbursement of Hungarian language course and exam	-	Section 51 of the Asylum Decree
Reimbursement of all or part of the travel-related expenses in case of permanent departure from the Hungary	-	Sections 31 and 50 of Asylum Decree

¹¹⁵ In effect from 1 March 2024.

It is important to mention that all benefits which can be accessed by the beneficiary of temporary protection can also be accessed by dual Hungarian-Ukrainian citizens who fled Ukraine after 24 February 2022 and had a permanent residence there, unless more favourable treatment is granted by virtue of the Hungarian citizenship.¹¹⁶ This is because those who hold Hungarian citizenship may not apply for temporary protection, but the law maker intended to grant them the same support as nationals of third countries entitled to the protection. Although there is no official data as to the numbers of Hungarian-Ukrainian dual citizens residing in Ukraine fled to Hungary as a result of the war, based on the information the HHC received from the Ministry of National Economic, 32,061 requests for financial support were submitted by dual citizens to competent government authority between February 2022 and 31 December 2024.¹¹⁷ No such data was provided for 2025. This figure is, of course, only indicative regarding the number of dual citizens who wished to claim financial assistance under the TP scheme, but there is no official information on the exact number of dual citizens who fled from Ukraine to Hungary for the war.

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

In the experience of the HHC lawyers, procedures to transfer residence to another EU Member State depend on the laws and practices of the targeted Member State. The Hungarian asylum authority does not require individuals moving to other member states to notify them beforehand. In practice, however, notifying the authority on the change of address is advisable to be able to receive official correspondence. If the person receives temporary protection in another member state, the asylum authority is obliged to withdraw the temporary protection status granted in Hungary with the consent of the beneficiary.¹¹⁸ It is worth mentioning that in its answer sent to the HHC, the asylum authority stated that according to their current practice, the fact that an individual was granted temporary protection status in another member state does not preclude them from applying for or being granted temporary protection in Hungary again.¹¹⁹

There is no formally introduced procedure to follow if the applicant has transferred to another member state. The law only provides that the asylum authority is to withdraw the status if the beneficiary renounces it in writing.¹²⁰

According to the data of the NDGAP, in 2025 the authority withdrew the temporary protection status of 972 beneficiaries who renounced their status.¹²¹

2. Access to asylum and other legal statuses

Contrary to Article 17 (1) of the TPD, it is not possible for either applicants for temporary protection or beneficiaries of temporary protection to apply for asylum in Hungary. On 26 May 2020, the government issued a government decree that introduced a new asylum system, the so-called “embassy procedure”.¹²² This new system was later included in the Transitional Act entered into force on 18 June 2020¹²³ and then transposed to Act L of 2025, which is in effect since 20 July 2025.¹²⁴ According to the new system, those wishing to seek asylum in Hungary, must first submit a ‘statement of intent for the purpose of lodging

¹¹⁶ Section 10 (3) of Act L of 2025.-

¹¹⁷ Information received from the Ministry of National Economic on 11 February 2025 by the HHC.

¹¹⁸ Section 25 (2) a.) of Asylum Act.

¹¹⁹ Letter received from the NGDAP asylum authority by the HHC on 16 June 2022.

¹²⁰ Section 25 (2) c.) of Asylum Act

¹²¹ Data received from the National General Directorate of Aliens Policing by the HHC on 9 March 2026.

¹²² Government Decree 233/2020. (V. 26.) on the rules of the asylum procedure during the state of danger declared for the prevention of the human epidemic endangering life and property and causing massive disease outbreaks, and for the protection of the health and lives of Hungarian citizens.

¹²³ Act LVIII of 2020 on the Transitional Provisions related to the Termination of the State of Danger and on Epidemiological Preparedness.

¹²⁴ Act L of 2025 on transposing the emergency government decrees issued in view of the armed conflict in Ukraine to law

an asylum application' at the Hungarian Embassies of **Kyiv**, Ukraine or **Belgrade**, Serbia.¹²⁵ Accordingly, no Ukrainian nationals submitted an asylum/statement of intent declaration throughout 2025.¹²⁶

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

1. Unaccompanied minors staying on the territory of Hungary
2. beneficiaries of subsidiary protection who are staying in Hungary;
3. family members of refugees and beneficiaries of subsidiary protection who are staying in Hungary;
4. those subject to forced measures, measures or punishment affecting personal liberty, except certain forms of short-term detention.

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

Consequently, if people eligible for temporary protection or beneficiaries of temporary protection want to seek asylum in Hungary, they must first go either to Ukraine or Serbia. In practice it is very unlikely that any person who fled the war in Ukraine would want to go back there for this purpose. They can go to Serbia if they hold the necessary travel document to enter the country. If the beneficiary is a Ukrainian national and has a valid passport, no visa is required and entry into Serbia is allowed.¹²⁷ However, if the beneficiary is a third-country national (e.g., family member of a Ukrainian citizen, who is eligible for temporary protection) who needs a visa to enter Serbia, the procedure is more complicated, as it has to be preceded by a visa procedure at the Embassy of Serbia, and the option to seek asylum in Hungary becomes quite hypothetical.

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

However, the HHC represented a Russian client whose temporary protection application was rejected, effectively both by the NDGAP and then, following a judicial review procedure, by the court. According to the court, in the temporary protection procedure the assessment of the non-refoulement under TP is of a restricted nature (practically no need for the same rigorous assessment as in the general asylum procedure, given the specific attributes of the TP procedure -e.g., it having to be fast etc.) and that the applicant, having regard to the judgment of the Court of Justice of the European Union in Case C-823/21, is not precluded from applying for asylum and stating in detail and giving reasons for all his fears concerning his return to Russia in the 'ordinary' asylum application.¹²⁸ While, on the one hand, the court's reference to the CJEU judgment recognising that the 'embassy system' is in breach with international and EU law, may be regarded as a positive development in jurisprudence, so far it has no practical relevance. On 27 February 2024, the client, accompanied by the lawyers of HHC, attempted to submit an asylum application in the Budapest client service of the NDGAP with reference to the judgment of Budapest Court, but the NDGAP took minutes and issued a ruling on the rejection of the application without an in-merit application, citing Section 32/F. c) of the Act on Asylum, providing that the application was submitted by a person clearly not eligible for the specific request. The NDGAP also held that there is no individual legal remedy. This practically means that the NDGAP still applies the provisions of Act LVIII of 2020 on the

¹²⁵ Section 1 of Government Decree 292/2020 (VI. 17.).

¹²⁶ Data received from the National General Directorate of Aliens Policing by the HHC on 9 March 2026.

¹²⁷ Republic of Serbia, Ministry of Foreign Affairs, 'Visa regime', available [here](#).

¹²⁸ Judgment of the Budapest Court 11.K.702.224/2023/8-II. of 7 September 2023.

Transitional Provisions related to the Termination of the State of Danger and on Epidemiological Preparedness, establishing the 'embassy system', where the personal scope of those who may submit an asylum application in the territory of Hungary is specified (as explained above). The NDGAP's decision was appealed and then again, the Court quashed the authority's decision and ordered it to conduct a new in-merit procedure.¹²⁹ Nonetheless, the asylum authority again refused the application without examination on the merits referring to the fact that the applicant was not entitled to submit an application without the embassy procedure having been initiated beforehand. The decision - wrongly - refers to CC decision 32/2021, that is the novelty in their arguments. The Court quashed the new decision as well and the asylum authority finally started an asylum procedure in the client's case on 26 May 2025. This case illustrates the struggles people in need of international protection face in Hungary. For more on this issue, please refer to the [General Report - Access to the procedure and registration](#).

As to asylum applications submitted by beneficiaries of temporary protection, the NDGAP revealed that no beneficiary had submitted any neither in 2022- 2025.¹³⁰

B. Family reunification

1. Family reunification as provided under the Temporary Protection Directive

Within the TPD, the Asylum Decree provides that if a family member of a temporary protection beneficiary is granted temporary protection by another Member State applying the TPD, the beneficiary may, with a view to ensuring family unity, ask the asylum authority if the temporary protection afforded in the other Member State can be extended to them. The asylum authority shall then consult the Member State concerned as to whether the beneficiary is to be granted temporary protection with a view to ensuring family unity in that other Member State. If the requested Member State agrees to grant the beneficiary temporary protection, the asylum authority shall withdraw recognition as a beneficiary of temporary protection and issue them with a certificate specified in Annex 4 of the Asylum Decree, containing the personal data of the beneficiary and the fact that the certificate is issued for the purpose of transfer from Hungary to the other member state. If the requested state does not grant temporary protection to the beneficiary, the asylum authority shall notify them thereof, at the same time informing them of the provisions of Article 20(2) of the Asylum Act providing that the family member of the beneficiary, who is beneficiary of temporary protection in another Member State, is to be recognised as a beneficiary for the purpose of family unity in Hungary upon request.¹³¹ Within the meaning of Asylum Act family members are: spouse (if family relationship existed before entering the territory of Hungary), minor child (including adopted and foster children), the parent or an accompanying foreign person responsible for them under Hungarian law.¹³²

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

2. Family reunification beyond the Temporary Protection Directive

Beyond the framework of the TPD, it is not possible to apply for family reunification, neither for the sponsor (beneficiary of temporary protection), nor for their third-country national family members. Under the scope of Act II of 2007 and Act XC of 2023¹³³ on the entry and stay of third country nationals, setting forth the

¹²⁹ Judgment of the Budapest Court 16.K.700.035/2024/11 of 29 February 2024.

¹³⁰ Data received from the National General Directorate of Aliens Policing by the HHC on 13 February 2023, 20 February 2025 and on 9 March 2026.

¹³¹ Section 105 of Asylum Decree.

¹³² Section 2 j.) of Asylum Act.

¹³³ Act II of 2007 is not effective from 1 January 2024 but was to be applied till 29 February 2024. It is replaced by Act XC of 2023, which is effective from 1 January 2024, but its provisions are to be applied from 1 March 2024. Rules concerning family reunification relevant for the purpose of this report have not changed.

rules for family reunification of third-country nationals (for further information see [General Report – Family Reunification](#)), a sponsor of a family reunification may not be a beneficiary of temporary protection.

C. Movement and mobility

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

In 2024, the HHC turned to the Police asking if beneficiaries of temporary protection, irrespective of their nationality may travel freely between Member States for 90 days if they hold a TP card or other document proving temporary protection issued in another Member State and a valid passport (old Ukrainian passport or biometric passport). The Police this time answered the question of the HHC stating that persons may travel freely within Schengen area if “if the Schengen Member State notifies the residence permit issued for temporary protection in the annex to the Schengen Border Code.” The answer further stated that “third-country nationals who hold a valid residence permit in the uniform format issued by one of the Member States applying the Schengen *acquis* in full shall have the right to move freely within the Schengen area for a maximum period of 90 days from the date of entry into the Member State.”¹³⁴ As of March 31 2026, Hungary included the TP card in Annex 22 of the Schengen Border Code.

As a positive development, under Section 32 of Act L of 2025. and Section 19 of Government Decree 196/2025 Hungarian authorities must accept Ukrainian passports expired since 24 February 2022 as valid, except in case of applications for citizenship.

D. Housing

Indicators: Housing

- | | |
|---|---|
| 1. For how long are temporary protection beneficiaries entitled to stay in reception centres? | |
| | For the whole duration of TP ¹³⁵ |
| 2. Number of beneficiaries staying in reception centres as of 31 December 2025 | 0 ¹³⁶ |
| 3. Number of beneficiaries staying in private accommodation as of 31 December 2025 | Not available |

Accommodation solutions

According to the HHC, which visited nearly 600 places in relation to the Ukrainian crisis in 2022, and 297 in 2023, 93 in 2024 and 5 in 2025, housing has been one of the most problematic areas of the Hungarian implementation of the temporary protection scheme. This is because tasks and competencies relative to accommodation have not been regulated by the usual legal instruments (e.g. in Government decrees), rather mechanisms have been established in an *ad hoc* manner. If an applicant indicates to the asylum authority upon submitting the application for temporary protection that they need accommodation, the National Directorate for Disaster Management, operating under the Ministry of Interior, carries out related arrangements.¹³⁷

¹³⁴ Information received from the National Police Headquarter by the HHC on 19 February 2024.

¹³⁵ Section 41 (2) of the Asylum Decree.

¹³⁶ Information received from the NDGAP by the HHC on 9 March 2026.

¹³⁷ Press release of the Disaster Management on its website, [here](#). The NDGAP confirmed in its response sent upon the information request of the HHC that the National Directorate for Disaster Management is responsible to accommodate temporary protection applicants and beneficiaries.

From Záhony railway station (border-crossing point) Ukrainian citizens and third-country nationals with Ukrainian residence permits can get a so-called free of charge 'solidarity ticket' and ride to Budapest by train. Since 1 August 2023, people arriving from Ukraine and travelling directly to Budapest can seek assistance at the Government Office at the Western Railway Station during opening hours, from where people may be sent to longer-term accommodation. If someone arrives outside opening hours and cannot ask for help that day in the Government Office, or if one passes through Hungary and does not want to stay for a longer period, a temporary accommodation for one night may be requested at Galvani utca 44/A, 1117 Budapest, Hungary. The accommodation is run by the Hungarian Maltese Charity Service.¹³⁸ The HHC talked to several social workers of Dévai Fogadó (accommodation site in Budapest), who explained that people could not successfully request accommodation at the government office located next to Nyugati railway station.¹³⁹

Access to state funded shelters was restricted first from 1 August 2023 and then again on 28 June 2024, when the government further restricted access to state-funded mass shelter of applicants and beneficiaries of temporary protection.¹⁴⁰ The amending rules came into full effect on 21 August 2024 and prescribe that only - the above listed - vulnerable beneficiaries of temporary protection who resided in a "territory impacted by war" remain eligible for state-funded mass shelter, within the timeframes given above.¹⁴¹ The list of oblasts the government considers to be a "territory impacted by war" is supposedly published, based on unclear criteria, at the beginning of each month on an official government website.¹⁴² The law only states that war-affected areas are 'administrative units of Ukraine directly concerned by military operations',¹⁴³ but apart from that, no distinctive criteria is set. The question of which regions in Ukraine are to be deemed "war-affected" is to be decided together by the Government Commissioner responsible for persons fleeing to Hungary from the Russian-Ukrainian war, the Minister responsible for Defence and the Minister responsible for Foreign Policy. The regions on the list remained the same since its first publication. At the time of writing (February 2026), these regions include: Dnipropetrovsk, Donetsk, Zaporizhzhia, Kyiv Oblast and Kyiv city, Mykolaiv, Odesa, Sumy, Kharkiv, Kherson, Chernihiv, Luhansk, Zhytomyr, the Autonomous Republic of Crimea.

Those falling outside the personal scope of eligibility criteria were allowed to submit leniency requests until 10 July 2024 to be able to remain in state-funded mass shelters. The leniency request was to be submitted to the respective defence committee, which then forwarded it to the Government Commissioner. The Government Commissioner could then give permission to the individuals in question to stay in a state-subsidized accommodation, in cases deserving special consideration.¹⁴⁴ It is not detailed in the law under which conditions a case deserves special consideration. More worryingly, the law remains silent on the situation of those who were not able to submit the leniency request till the said date, for instance, because they arrived in Hungary after 10 July. The HHC sent a freedom of information request to the Government Commissioner, inquiring about the number of those who submitted the request and also the number of granted/rejected requests. Based on the answer of the relevant ministry, 80 percent of the requests submitted by 1,486 persons were rejected, in decisions lacking any legal formalities and reasoning.¹⁴⁵

Furthermore, according to these latest amendments, from 21 August 2024 onwards, only municipalities and the Maltese Charity Service will receive support for accommodating beneficiaries from Ukraine.¹⁴⁶ All other accommodation providers will no longer receive support from the respective defense committee for

¹³⁸ No official information available on this. Assistance partners received this information via unofficial channels. Information appears on the website of UNHCR too, available [here](#).

¹³⁹ Information recorded by the HHC during its June 2024 monitoring mission.

¹⁴⁰ Government Decree 134/2024 (VI. 28.) amending the rules of Gov. Decree 104/2022 (III.12.).

¹⁴¹ Section 3 of Gov. Decree 104/2022 (III.12.).

¹⁴² Available [here](#).

¹⁴³ Section 1(f.) of Gov. Decree 104/2022 (III.12.).

¹⁴⁴ Section 18(3) of Gov. Decree 104/2022 (III.12.).

¹⁴⁵ Information received from the Office of Prime Minister by the HHC on 6 September 2025.

¹⁴⁶ Sections 4 and 8 of Gov. Decree 104/2022 (III.12.).

hosting people from Ukraine. The HHC turned to the Maltese Charity Service in a freedom of information request, inquiring about the number of those individuals after whom the charity requested state support and also about the accommodation sites operated by them. The Maltese charity Service stated in its answer that - as of 23 October 2025 - they submitted their subsidy request after 918 persons and the run accommodation facilities in 24 locations (at one location there might be multiple accommodation facilities).¹⁴⁷ In their response relating to 2025, the Maltese Charity Service shared that between 21 August 2024 and 30 June 2025, they provided accommodation to approximately 130 beneficiaries from Ukraine every day.¹⁴⁸

If the person in need of accommodation does not belong to one of the above groups, allowance may only be requested if the beneficiary of TP or the dual citizen undertakes employment.¹⁴⁹ In this case, the allowance will be paid to the employer and not to the municipality or the accommodation provider.¹⁵⁰ The Ministry of Economic Development stated that, on 31 December 2024, the number of employees covered by the allowance given to employers was 166.¹⁵¹ On 31 December 2025, the number of employees covered was 140.¹⁵² This support is available if the beneficiary of TP or dual citizen is employed in Hungary in a fixed-term or open-ended job, working at least 20 hours per week. This support is available for all TP beneficiaries and dual citizens from Ukraine, regardless of where they previously lived. The employer must apply for the support. If the employee has children under the age of 16, the support is contingent on the child attending school until the end of primary education, as verified by the school. The employer and landlord must sign a contract for the employee's accommodation. The employer is responsible for applying for the support, and the contract must be attached to the application. The employer must first pay the accommodation fee to the landlord before they can apply for housing support. The support starts once the employment contract, accommodation agreement, and application have been submitted. Employers can submit the application electronically through the National Employment Service or at the relevant government office based on the employee's work location. The amount of support matches the monthly accommodation fee outlined in the accommodation contract. The support ends if:

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

The law also ambiguously states that, between 1 August 2023 and 20 August 2024, a person not eligible for assistance under the law shall be entitled to shelter and the infrastructure of the reception centre may also be used for accommodation.¹⁵³ This practically meant that the Vámoszabadi and Balassagyarmat reception centres (should have) accommodated some of those whom the accommodation provider could not claim allowance.

NDGAP has two reception facilities for asylum-seekers and beneficiaries of international protection in Vámoszabadi and Balassagyarmat, but as a rule these places cannot be accessed by those fleeing Ukraine. Following the outbreak of the war in Ukraine, a person who applied for temporary protection status and later received temporary protection was placed in 2022 at the Balassagyarmat Community Shelter, and remained there through 2023 and until August 2024. Another temporary protection status holder stayed at the community shelter from April 2024 through August 2024.

In Vámoszabadi in 2023, only 2 temporary protection holders and in 2024, only one beneficiary of temporary protection was placed who met the eligibility requirements for placement under Section 3(7) of Government

¹⁴⁷ Information received from the Maltese Charity Service by the HHC on 23 October 2024.

¹⁴⁸ Information received from the Maltese Charity Service by the HHC on 16 February 2026.

¹⁴⁹ Sections 3/A-H of Gov. Decree 104/2022 (III.12.).

¹⁵⁰ See the section on Government support of employers below under Employment and education.

¹⁵¹ Information received from the Ministry of Economic Development by the HHC on 11 February 2025.

¹⁵² Information received from the Ministry of Economic Development by the HHC on 19 March 2026.

¹⁵³ Section 3(7) of Gov. Decree 104/2022 (III.12.) as effective on 1 August 2023- 20 August 2024.

Decree No. 104/2022 (III. 12.). In 2025, no beneficiaries of temporary protection stayed at the Directorate-General's reception centres.¹⁵⁴

Practical consequences of the legislative amendments of 2023-2024

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

The integration of families through schools and connections made had been abruptly halted, the consequences of which are unforeseen. The recent changes regarding the diminished amount of state support for accommodations affected almost every shelter the HHC team visited. Many families face insecurity due to the potential loss of accommodation for one or more family members, which also affects their mental health. In the experience of the HHC, the overall trend is that families choose to stay together, so if one family member has to leave the shelter, the whole family follows, even if there is no consequent accommodation option. Many accommodation providers did not agree with the new rules and tried to continue accommodating people even without state support, but as there is not any centralised and official statistical data about it, the number of those accommodation sites is unknown.

The exact number of people that were affected by the amendments that came into effect on 21 August 2024 is not known. Based on the regular monitoring missions of the HHC to accommodation sites, an estimated 3.000 beneficiaries of temporary protection lost their eligibility for state-funded shelter on 21 August, with cca. 1,000 continue to be accommodated under this scheme. In the experience of the HHC, the modified rules primarily affected those coming from the Transcarpathia region of Ukraine, many being single women with children, belonging to the Roma population. The implementation of the rules was not officially prepared: the rules were published on 28 June 2024, yet people affected had only 12 days to submit their leniency requests based on the new law. Without having been provided with official and targeted information by the government and relevant authorities, neither the people accommodated, nor the accommodation providers, knew how they were expected to proceed, whether there is a legal remedy against a potential negative decision that they receive after submitting the leniency request, if there was any alternative housing solutions they might access etc. As a result, on 21 August 2024, hundreds of families were evacuated and ended up on the brink of homelessness.¹⁵⁵ The HHC monitored the situation at multiple locations in September and August 2024. Some examples of the monitoring experience:

- Several families had already left, and others were packing their belongings at a shelter in Érd when the HHC team arrived on 21 August. One man explained that his employer offered him a house for rental without any furniture where they were planning to spend the night. There was no contract signed, but he was required to pay a sizable deposit. The HHC team called humanitarian organisations to assist them with mattresses but could not find any. Among the families losing their accommodation were women with small children and some elderly as well.
- 120 people, 80 children and 40 adults were waiting in the main street of Kocs, as they were made to leave the Henzer Hostel early in the morning on 21 August. The accommodation provider gave breakfast and lunch to the people in the street. After some negotiation, he allowed the children to sleep in the courtyard for the night. The parents did not have enough

¹⁵⁴ Data received from the National General Directorate of Aliens Policing by the HHC on 9 March 2026.

¹⁵⁵ See the reports of some Hungarian media outlets about the events of 21 August 2024, for instance: Telex, *More than a hundred evicted Ukrainian refugees sit on the streets of Kocs, UNHCR is not happy*, 21 August 2024, available [here](#). Also see the press release of the HHC [here](#).

place there. Apart from two families (who stayed with relatives for the night), the 120 people stayed in the courtyard of their previous shelter. The owner of their previous shelter designated a roofed section of the courtyard where children were allowed to borrow mattresses from the shelter, but due to the limited space, the adults spent most of the night awake. On 22 August, 3 families left for Ukraine in the morning because they felt their situation was hopeless. During the day, approx. 80 people remained on the street. Three buses arrived in Kocs at 4 PM and left for Dorog to temporarily accommodate people. A number of families were transferred to Enying. For unclear reasons and under unclear circumstances, about 70 people were transferred during the night from their shelter in Dorog to shelters in Esztergom-Kertváros.

- Four families in Tata are threatened to be evicted from their accommodation by the owner. They are unable to pay the required rent as they only have occasional work and many children. The rent is 160 000 HUF (approx. 400 EUR) / room plus 800 HUF / day for each person for utilities. The owner did not help them to submit their leniency requests and was of the opinion that they were not even eligible for it.
- Around 50 PoCs left the site in Vitnyéd-Csermajor before 21 August to unknown locations. Those staying at Vitnyéd (93 people of which 43 were children) are not at imminent risk of homelessness, but it is uncertain how long they may stay at the accommodation site. Police checks were conducted almost every day in August 2024. However, no police measures were taken. The people there have no intention to leave, except for a man who said he had bought a house and would move there with 30 others by the end of that week. People we serve said they are especially reluctant to leave because they do seasonal work around Vitnyéd and in Austria. The accommodation was otherwise in a dire condition.

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

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

Legal actions taken

As the Temporary Protection Directive requires that Member States ensure that beneficiaries of temporary protection have access to suitable accommodation, the above restrictions that came into effect on 1 August 2023 and 21 August 2024 are in clear violation of EU law. The introduction of the August 2024 restriction has also been done in a discriminatory manner, as while all TP beneficiaries flee from the war in Ukraine, only those will be provided with state-subsidized accommodation whose former residence is in an administrative district which is directly impacted by military operations. The law accordingly provides

for differential treatment between two groups who are in a comparable situation, without a lawful justification.

The HHC submitted a complaint to the European Commission in December 2023 that was registered only in May 2024.¹⁵⁶ No further action has been taken since then by the Commission. Following the restrictions announced in June 2024, the HHC has submitted another complaint to the Commission on 5 July 2024, referring to the previous one relating to revocation of support for housing. To date, these complaints are still under investigation.

The HHC started litigation for people who lost their accommodation after 21 August 2024 on a national level too. The HHC provides legal representation to 130 people fleeing Ukraine (mostly women and their young children) in five cases (out of which three are joint cases of 72, 38 and 11 persons respectively) whose leniency request was rejected by the Government Commissioner responsible for refugees from Ukraine and therefore lost their state-funded accommodation as of 21 August. While one procedure is still pending, in 3 other cases the Budapest Court quashed the decision of the Commissioner on formal grounds, for the decision not having been compliant with the legal requirements of an administrative decision.¹⁵⁷ The court also ordered the Commissioner to conduct new procedures resulting in formally correct decisions. The Court, however, did not decide on the merits of the issue - namely on the need to directly apply EU law governing the TP regime and hence providing for accommodation for TP beneficiaries, without allowing discretion in the matter. In 2025, in the repeated procedures 10 beneficiaries of temporary protection received a positive decision on their leniency requests and thus were able to access subsidized housing, while 42 clients represented by the HHC received formalized rejection decisions from the Government Commissioner responsible for refugees from Ukraine. The HHC appealed all these rejections at the Budapest Court.

In February 2026, the Budapest Court ruled on the merits of the cases and decided that the government decree does not violate EU law, arguing that the EU Temporary Protection Directive leaves a wide margin of discretion to member states regarding the provision of accommodation. The Court also declined to request a preliminary ruling from the Court of Justice of the European Union, stating that the Directive was sufficiently clear for the Hungarian court to interpret on its own. The HHC disputes this reasoning of the Court and believes that the Directive cannot be considered so clear if courts must interpret it in lengthy reasoning rather than referring questions to the EU's highest judicial authority. and more importantly the Court's interpretation effectively rewrites the Directive in order to justify the Hungarian regulation. The very purpose of temporary protection is to ensure real and predictable support for people fleeing war – not to allow political or administrative decisions to exclude large groups from basic assistance. For these reasons, the HHC is has filed a review request with the Kúria, Hungary's highest judicial forum, in the hope that the Kúria will clarify that housing support for refugees under temporary protection cannot be arbitrarily withdrawn, and that national regulations must not undermine the protection guaranteed by EU law.

The HHC also represented a mother with 2 children, who arrived after 10 of July 2025, and thus could not submit a leniency request, asking the court to establish that as recipients of temporary protection (TP), they are eligible for state-funded accommodation. In this case the HHC argued that the plaintiffs' entitlement to state-subsidized housing is to be declared. The defendant in the case was the Government. This lawsuit, however, has been rejected by the court, with reference to the fact that the Government as an entity could not be a defendant in the procedure. It has been moreover argued by the court that there had not been any administrative action per se, only the fact that there was a law which was made by the Government, which - in case of application - would not result in the plaintiffs having entitlement to

¹⁵⁶ 9CPLT(2024)01258.

¹⁵⁷ Pending case before the Szeged Court: n. 2.K.700.024/2025. Judgments of the Budapest Court: 14.K.702.978/2024. and 14.K.703.627/2024. of 12 February 2025, judgment in case nr egyesítés 29.K.703.008/2024. of 19 March 2025.

accommodation. This means that according to the judgment, the HHC tried to challenge the law itself and not the administrative action, hence, the court could not be competent.¹⁵⁸

The HHC also represented a Hungarian media outlet, called Magyar Hang, in a lawsuit concerning the rejection of a freedom of information request that was sent by Magyar Hang to the Ministry of Foreign Affairs. The request aimed to obtain information on how “*war affected areas*” of Ukraine are defined and chosen by the Ministry and other relevant actors, as it is foreseen by Government Decree 104/2022 (III.12). As a result of the trial held on 13 March 2025, it turned out that there is no data stored by the Ministry with relation to any communication with other actors (ministries and Government Commissioner) concerning respective Ukraine regions, nor any information based on which some areas are deemed to be war affected, while others are not.¹⁵⁹ This basically means that there is no trace of any official substantive and real governmental assessment of which areas in Ukraine are affected - mostly - by the war and which are not, and hence, who could be beneficiaries of state-subsidized accommodation as per the - otherwise EU law violating - provisions of Government Decree 104/2022 (III.12.)

Other housing solutions

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

According to Caritas Hungary, in 2022, they provided thousands of people with accommodation at very diverse spots, ranging from clergy houses to private apartments run by or with the support of the charity.¹⁶⁰ It is unclear whether the Charity Council members have funded their services, including accommodation provided by them, exclusively through government allocated funds,¹⁶¹ or through their private funds too. In 2023, they provided accommodation to 670 persons in Esztergom, Bicske, Iszkaszentgyörgy, Balatonakali from government funds. In 2024, and in 2025 no such service was provided by them.¹⁶² The Hungarian Interchurch Aid provided 693 persons with accommodation (16,425 nights) in 2022, 661 persons (18.634 nights) in 2023 and 120 persons (21,726) in 2024. In 2025, no such services were provided by them.¹⁶³ This service was partially funded by own resources.¹⁶⁴ The Hungarian Reformed Church Aid provided accommodation in 20,113 cases in the period from 24 February 2022 to 31 December 2025.¹⁶⁵ The Hungarian Red Cross provided accommodation for 3,466 persons in 2023 and since August 2023 – when the legislation concerning the accommodation of temporary protection beneficiaries became stricter – they assisted 651 persons in finding housing solutions.¹⁶⁶ The Red Cross provided accommodation for 2376 persons between 25 February 2022 and 31 December 2025.¹⁶⁷

NGOs, private entities and individuals from the civic sphere have also mobilised themselves in an exceptional manner and assisted many Ukrainians in finding or by providing accommodation. Kalunba, a Budapest-based NGO, reported, for instance, that they provided 161 individuals with temporary accommodation for a total of 501 nights, and could provide 31 apartments for rent for a total of 180 individuals in the period between 1 June 2022 and 6 February 2023. No report arrived from Kalunba concerning the years 2024 and 2025.¹⁶⁸

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

¹⁵⁹ See the judgment of Budapest Court nr. 36.P.20.684/2025/6-II. of 13 March.

¹⁶⁰ Information received from Caritas Hungary on 23 January 2023.

¹⁶¹ The Hungarian Government announced on 5 March 2022 that members of the Charity Council would receive 3 billion forint. The official press release can be found [here](#). In the Act XXV of 2022 on the central budget of Hungary for 2023 there is 1,218 billion forint allocated to the Charity Council, see [here](#).

¹⁶² Information received from Caritas Hungary on 22 February 2024 and 10 February 2025 and 14 January 2026.

¹⁶³ Information received from the Hungarian Interchurch Aid by the HHC on 6 January 2026.

¹⁶⁴ Information received from the Hungarian Interchurch Aid by the HHC on 2 April 2024 and 7 February 2025.

¹⁶⁵ Information received from the Hungarian Reformed Church Aid by the HHC on 16 February 2026.

¹⁶⁶ Information received from the Hungarian Red Cross by the HHC on 22 February 2024.

¹⁶⁷ Information received from the Hungarian Red Cross by the HHC on 7 January 2026.

¹⁶⁸ Information received from Kalunba organisation by the HHC on 6 February 2023.

The Jesuit Refugee Service provided housing-related services to 1,176 people in 2023 and provided accommodation support to 699 persons in 2024. This primarily meant financial contributions to housing costs. The Service highlighted concerning 2024 that from a survey they conducted within their clients they learned that the housing situation of Ukrainian refugees in Hungary remained precarious, exacerbated by high rents and limited supply. Despite the continued efforts of NGOs and support agencies, there are few affordable and stable housing options. Long-term housing, meanwhile, was among the top five most pressing concerns among respondents, with older respondents indicating a greater need for stable housing, as did single mothers. Housing stability remained a concern, with more than half of respondents unsure how long they would be able to stay in their current accommodation. Discrimination experienced by clients when looking for housing remained a recurring problem.¹⁶⁹ In 2025, they continued to provide financial support to the housing costs of families in addition to securing help from social workers and educational advisors.¹⁷⁰

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

- they provided rent assistance for people living in private accommodations
- financial assistance for people living in official accommodation sites. The charity also accommodated families in their own premises and provided emergency night shelters to persons in crisis situation.¹⁷¹

In 2025, the Evangelical Lutheran Diakonia provided housing support to approximately 500 people, out of which around 50 were supported outside Budapest. The support meant rent assistance for 2-6 months and the provision of emergency shelter in crisis situations.¹⁷²

Next Step offers short-term accommodation to single women through referral from other organization such as IOM or UNHCR.¹⁷³

IOM Hungary provided direct rental support to three refugee families (15 individuals), as they transitioned from shelters to private housing in 2025. IOM collaborated with the From Streets to Homes Association (Utcáról Lakásba Egyesület, ULE) to ensure that refugees fleeing from Ukraine had access to safe, dignified, and stable living conditions. ULE's support throughout the project (July-December 2025) focused on assisting families with housing subsidies and social work to promote their inclusion into society. The organization specifically targeted refugees in need of long-term housing solutions, with a particular emphasis on those who were already vulnerable prior to fleeing the conflict. This group included Hungarian-speaking Roma from Zakarpattia in western Ukraine, many of whom had lost eligibility for state-subsidized shelter due to the new regulations. Through this partnership, 235 individuals from 60 households received rental subsidies, allowing them to maintain or transition to private housing. IOM has the capacity to provide cash support for nearly 300 individuals until the end of May 2027. The project enables assistance for those living in private rental accommodation who arrived in Hungary no more than 36 months ago. The support is provided in the form of cash assistance, the amount of which is designed to closely reflect typical rental costs in Hungary. In 2025, IOM provided 75 beneficiaries with such cash support.¹⁷⁴

The Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI) is the homeless service provider of Budapest Municipality, that provided accommodation to people fleeing the war in Ukraine since 2022. In 2024, they sheltered 144 people, while in 2025, they provided a place for 103 people, out of which 54 were minors. As their focus is on moving the families out of their community

¹⁶⁹ Information received from the Jesuit Refugee Service by the HHC on 12 April 2024 and 27 February 2025.

¹⁷⁰ Information received from the Jesuit Refugee Service by the HHC on 9 March 2026.

¹⁷¹ Information received from the Evangelical Lutheran Diakonia by the HHC on 28 February 2025.

¹⁷² Information received from the Evangelical Lutheran Diakonia by the HHC on 24 February 2026.

¹⁷³ Information received from Next Step by the HHC on 19 February 2026.

¹⁷⁴ Information received from IOM Budapest by HHC on 27 January 2026.

housing, which is a homeless shelter, and therefore is not ideal for families with small children, they renovated 3 apartments. In 2024, they were able to move two families into apartments and in 2025 one large family could occupy the third one. These apartments are rent-controlled and BMSZKI provides social workers to help the families in the new situation.¹⁷⁵

UNHCR conducted a multi-sectoral needs assessment in September 2022 with the participation of 512 respondents (83% Ukrainian refugees, 15% Hungarian-Ukrainian dual citizens, and 2% third-country nationals). Although it is emphasised that the result cannot be considered representative for the challenges of reaching out to private households, the paper found that 'one in three interviewees is residing in private accommodation and the percentage differs based on the location of residence; 61% of the refugees surveyed in Budapest are staying in private accommodation (7% in the rest of the country), while 74% of the refugees surveyed outside of Budapest are accommodated in collective sites, followed by hotels/hostels (18%)'.¹⁷⁶ The same assessment was conducted by the UNHCR in 2023,¹⁷⁷ with the following result: 60% of the surveyed households live in private settings and 18% of households are in workers' accommodation, defined as arrangements provided by employers. Collective sites, often offered by the government or charitable organisations, house 14% of the respondents while 8% reside in hotels/hostels.¹⁷⁸ As to 2024, UNHCR reports that the proportion of refugees in private and shared accommodation presents a continued reduction of refugees hosted in collective sites (from 14% to 9%) and an increase in private accommodations (from 43% to 58%). The report emphasises that "while the shift reflects refugees' efforts to secure longer-term housing, it is important to note that 2023 data was collected before the government limited subsidized accommodation to vulnerable groups, contributing to the decrease in collective housing. Additionally, the 2024 data may overestimate the shift due to more limited access to refugees in collective sites."¹⁷⁹ UNHCR's 2025 socio-economic insights survey was conducted on 431 households; covering 973 people. It found that "half of the households interviewed reside in private accommodation (apartments or houses), a slight decrease compared to last year (-8%). This change was mostly driven by an increase of households staying in shared accommodation provided by their employer (+6%), either in worker's accommodations or through a benefit called "housing allowance for employed beneficiaries". Similar to last year, one out of three households face issues with their accommodation. The most common issues are related to privacy because of shared accommodation, or lack of access with local transportation. Additionally, 38% of households are living in overcrowded accommodations."¹⁸⁰

Access to reception facilities

Temporary protection beneficiaries,¹⁸¹ applicants,¹⁸² as well as Hungarian-Ukrainian dual citizens¹⁸³ as explained earlier, are entitled to access reception conditions. Pursuant to Section 26 (1) of the Asylum Act, 'reception conditions include material reception conditions, and all entitlements and measures defined in an act of Parliament or Government decree relating to the freedom of movement of applicants, as well as health care, social welfare and the education provided to applicants.'¹⁸⁴ Beneficiaries in need are entitled to 'material reception conditions and to care and support, in accordance with specific other legislation'¹⁸⁵ (for specific entitlements within reception conditions see [Residence Permit](#)). According to the Asylum Decree, the implementing law of the Asylum Act, material conditions are accommodation and

¹⁷⁵ Information received from the BMSZKI by HHC on 20 February 2026.

¹⁷⁶ UNHCR, *Hungary: Multi-Sectoral Needs Assessment*, November 2022, available [here](#).

¹⁷⁷ The assessment, guided by the Refugee Coordination Forum (RCF), involved nearly 700 adult respondents from refugee households across 18 counties in Hungary.

¹⁷⁸ UNHCR, *Hungary: Multi-Sectoral Needs Assessment, Final Report*, December 2023, available [here](#), 30.

¹⁷⁹ UNHCR, *Hungary: Socio-Economic Insights Survey, Final Report*, October 2024, available [here](#), p. 33.

¹⁸⁰ UNHCR, *Hungary: Socio-Economic Insights Survey*, February 2026, available: <https://data.unhcr.org/en/documents/details/121267>

¹⁸¹ Section 32 (2) of Asylum Act.

¹⁸² Section 26 (2) of Asylum Act.

¹⁸³ Section 8 of the TP Decree.

¹⁸⁴ Section 26 (1) of Asylum Act.

¹⁸⁵ Section 32 (2) of Asylum Act.

care provided at the reception centres, the use of travel discounts, and payment of the costs of the public burial of applicants for recognition.¹⁸⁶

Based on Section 41 (2) of the Asylum Decree beneficiaries of temporary protection may be entitled to accommodation and care. This provision, however, became non-applicable as of 1 August 2023 as a result of a legislative change.¹⁸⁷ This change affected the accommodation and care of beneficiaries, as it was partially explained above under the section 'accommodation solutions'.

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

As mentioned above the NDGAP stated that on 31 December 2023, there was only one beneficiary of temporary protection accommodated at the Vámosszabadi reception centre, while 2 were accommodated in total throughout 2023. Worryingly, the NDGAP also stated that "in the Vámosszabadi reception centre only those beneficiaries of temporary protection were accommodated throughout 2023, who, according to Section 3(7) of Gov. Decree 104/2022 (III.12), were not entitled to receive care (meals), but were only entitled to accommodation. They were provided with basic hygiene items, but in a few days, they left and their whereabouts was unknown."¹⁸⁸ Based on this statement of the NDGAP, it seems that for some unclear reasons, the authority interprets the law as obliging them to provide the beneficiaries in question with hygiene items but not with meals. In the absence of food provision, it is unsurprising that those - only 1 or 2 persons - who went to the reception centre left after a very short time. The HHC was not granted leave to enter the premises of the Vámosszabadi reception centre despite requesting it from the NDGAP, with reference to the fact that those beneficiaries of temporary protection who were accommodated at the centre could reach out to the HHC "outside the centre".¹⁸⁹ In 2024, 2 beneficiaries of TP were accommodated in Balassagyarmat and 1 in Vámosszabadi,¹⁹⁰ noting that after 20 August 2024, when further -above detailed restrictions - came into effect, the law did not provide any longer that "accommodation may be facilitated by the infrastructure of the reception facilities".¹⁹¹ In 2025, no beneficiaries of temporary protection stayed at the Directorate-General's reception centres.¹⁹²

Reduction or withdrawal of reception conditions

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

¹⁸⁶ Section 15 (2) of Asylum Decree

¹⁸⁷ Gov. Decree 337/2023 (VII.24.) amending the TP Decree by adding Section 5(4) providing that "Section 41(2) of the Asylum Decree shall apply with the exception that the beneficiary of temporary protection shall not be entitled to accommodation and care at the reception centre."

¹⁸⁸ Information received from the NDGAP by the HHC on 19 February 2024.

¹⁸⁹ Request to grant entry was sent to the NDGAP on 13 September 2023 by the HHC, rejection of the NDGAP was received by the HHC on 15 September 2023.

¹⁹⁰ Information received from the NDGAP by the HHC on 20 February 2025.

¹⁹¹ Gov. Decree 104/2022 (III.12) as effective on 20 August 2024.

¹⁹² Data received from the National General Directorate of Aliens Policing by the HHC on 9 March 2026.

- ❖ is engaged in repeated or serious violation of the rules of conduct at the reception centre;
- ❖ is engaged in any repeated or serious breach of the obligation of cooperation;
- ❖ has disclosed false information or untrue facts concerning his/her assets or income, or if he/she refused to provide such information in the interest of obtaining the material reception conditions or the aid and assistance provided in accordance with the relevant legislation; or
- ❖ is engaged in seriously violent behaviour.¹⁹³

Government Decree 104/2022 (III.12.) furthermore provides that if the person accommodated does not leave the accommodation upon the request of the accommodation provider (if it is a private accommodation, for instance) the accommodation provider may notify the police. The police may oblige the person to leave the accommodation and, upon request, transfers them to another accommodation designated by the local defence committee.¹⁹⁴

Legislative changes amending Government Decree 104/2022 (III.12.)¹⁹⁵ affected the situation of those whose TP application was rejected or renounced but submitted a subsequent application: these persons would not be entitled to be placed at emergency accommodation sites, but they could be placed in the reception centres until 20 August 2024.¹⁹⁶ From 21 August 2024 onward following further restrictions, this option also ceased. If the TP status was renounced, this restriction did not apply to:

- ❖ a pregnant woman, as from the date of the establishment of her pregnancy;
- ❖ a parent of a child under six years of age;
- ❖ a person with a disability and their caretaker;
- ❖ a person aged 65 or over;
- ❖ a person under 18 living in the same household as one of the above persons, until 20 August 2024¹⁹⁷

Tasks related to the provision of reception conditions are to be carried out by the asylum authority.¹⁹⁸ In order to carry out reception-related tasks more efficiently, the asylum authority may conclude contracts with in particular, a non-governmental organisation, a local authority, church, a foundation, an institution of the mentioned entities, a company or any other legal entity to provide:

- ❖ the applicant with the material conditions for admission;
- ❖ the benefits falling within the material reception conditions to which the beneficiary is entitled;
- ❖ the social and mental health care to applicants and beneficiaries;
- ❖ information on the rights and obligations of the applicant and beneficiary;
- ❖ Hungarian language course to beneficiaries.¹⁹⁹

There is no official data available as to the number and capacity of those state-run accommodation sites which are dedicated to temporary protection beneficiaries. Concerning the years 2022-2023, the HHC sent a freedom of information request to the relevant ministries inquiring about the matter, but none of the ministries engaging in the crisis response (Ministry of Interior, Prime Minister's Cabinet Office, Prime Minister's Office, Ministry of Economic Development) could answer the HHC's housing-related question, stating that they do not qualify as official owners of these data. At the time of writing, it is legally unclear

¹⁹³ Section 32/A (1) a.)- d.) of Asylum Act.

¹⁹⁴ Section 6 of Gov. Decree 104/2022 (III.12.)

¹⁹⁵ Changes effective as of 1 March 2024, introduced by Gov. Decree 30/2024 (II.22) amending Government Decree 104/2022 (III.12.)

¹⁹⁶ Sections 3 (8) and (10) of Gov. Decree 30/2024 (II.22).

¹⁹⁷ Section 3 (9) of Gov. Decree 30/2024 (II.22).

¹⁹⁸ Section 12 (2) of Asylum Decree.

¹⁹⁹ Section 14 (2) a.)-e.) of Asylum Decree.

which central government body is responsible to ensure compliance with the TPD's reception condition requirements, and no law specifies it. As to 2024, the Prime Minister's Office sent data with regard to the number of contracts which were conducted between the Maltese Charity Service and respective defence committees and on the locations where state-subsidized accommodation are operated by the Maltese Charity Service (as explained above under Housing - accommodation solutions).²⁰⁰ It can be therefore concluded that housing tasks belong - at least partially - to the Prime Minister's Office.

Living conditions

In 2024-2025, the HHC did not conduct as extensive monitoring visits as it did over the previous years, therefore, accommodation conditions were not as closely monitored and substantive observations cannot be analysed for the purpose of this report.

Subsistence allowance

Another issue of great concern has been the inconsistent receipt of the monthly subsistence allowance. This was a frequently reported and constant issue in 2022 and 2023 and there were some reports also from 2024 and 2025, although less than in the previous years.²⁰¹ Beneficiaries of temporary protection have regularly complained to the HHC about either not receiving the subsistence allowance at all despite requesting it or receiving it with a great delay. The problem often arises in the case when families have to move and need to register their new address for the receipt of the subsistence allowance. In some cases, the subsistence allowance arrived in one month but was absent in the following months. Families also reported that while they requested the subsistence allowance together, some family members received it, while others did not (typically the subsistence allowance requested for minor children).

In its 2022 multi-sectoral needs assessment report, the UNHCR noted that out of 512 respondents 93% had been granted temporary protection, and those granted protection had received this financial assistance at least once.²⁰² The UNHCR added that this does not mean that the allowance is currently received or that it has been received regularly. In 2023, UNHCR's multi-sectoral needs assessment reported that 56% of surveyed households acknowledged receiving subsistence allowances upon their arrival, while 28% reported such allowances in the last 30 days since the survey took place.²⁰³ In 2024, the UNHCR did not conduct a survey in this regard. The HHC requested data in 2022 from the Ministry of Economic Development on the number of beneficiaries receiving subsistence allowance, but the Ministry stated in its response that they did not have this information.²⁰⁴ In 2023, upon the same request, the Ministry stated that by December 2023, there had been 10,967 request for subsistence allowance submitted from beneficiaries of temporary protection.²⁰⁵ Concerning 2024, Ministry data appears to indicate that a monthly average of - little above - 4000 requests for subsistence allowance was submitted per month.²⁰⁶ As beneficiaries have the obligation to appear in front of the competent authority each and every month to be able to claim the subsistence allowance,²⁰⁷ this data suggest that there around 4000 beneficiaries at a time who may be entitled to claim the financial support. The Ministry did not state how many of these requests were granted. The director of NGDAP's asylum department suggested on 3 March 2023 to the representatives of HHC, that, according to his knowledge, a stable average of around 7,000 beneficiaries receive subsistence allowance on a regular basis in Hungary. In 2025, NDGAP provided a monthly breakdown of subsistence allowance requests that range from 4,718 to 5,234 with the month

²⁰⁰ Information received from the Prime Minister's Office by the HHC on 6 November 2024.

²⁰¹ The issue was recorded by the HHC during its monitoring missions in Kevermes (May 2024), Érd (April 2024) and in Szentes (May 2024) and in Győr (March 2025).

²⁰² UNHCR, *Hungary: Multi-Sectoral Needs Assessment*, November 2022, available [here](#), p. 14.

²⁰³ UNHCR, *Hungary: Multi-Sectoral Needs Assessment, Final Report*, December 2023, available [here](#), p. 25.

²⁰⁴ Information received from the Ministry of Economic Development by the HHC on 27 January 2023.

²⁰⁵ Information received from the Ministry of Economic Development by the HHC on 19 February 2024.

²⁰⁶ Information received from the Ministry of Economic Development by the HHC on 11 February 2025.

²⁰⁷ Section 4 of Gov. Decree 103/2022 (III.12), please also see Employment and education below.

January listing the highest number of requests. This number seems rather low when compared to the number of TP holders in Hungary - 43,300 as of 31 December 2025.²⁰⁸

Accommodation of vulnerable people

As has been noted under [Guarantees for vulnerable persons](#), there has been no comprehensive screening for people with special protection needs,²⁰⁹ which often resulted in people being accommodated in inappropriate conditions with regard to their needs. In the experience of the HHC, people with disabilities or special medical needs have been frequently placed in shelters lacking the necessary medical/psychological assistance. The most notable case concerned a 65-year-old Ukrainian man met by the HHC team on 4 August 2022 in the **Fülpösdaróc** (village close to the border) accommodation site. The accommodation was not well-equipped and hygiene was completely absent. A total of 22 individuals were accommodated there at the time. They were generally in a poor mental and physical state, complaining about not receiving sufficient food provision. The said Ukrainian man, who was a beneficiary of temporary protection already, looked seriously underfed, he was barely able to speak. Following his arrival in Hungary, he had been diagnosed with lung cancer. It was apparent that he would have needed constant and special medical attention, which was absent in the accommodation site. HHC monitors were informed that no Hungarian health-care provider could accept the man, although operators of the accommodation site and staff members of IOM had tried multiple times, at various hospitals. As a consequence, as the HHC was later informed by the operators of the accommodation site, the man was transferred back to Ukraine and was placed in a hospice near the border. His example is exceptional, but quite alarming as highlighting the potential deficiencies of the reception system with regard to the population with special needs. The **Fülpösdaróc** accommodation site was later renovated with the assistance of IOM and conditions became decent by October 2023.

In 2023, the most notable case highlighting all potential deficiencies of the accommodation scheme recorded by the HHC²¹⁰ concerned a Ukrainian woman who claimed to have been a victim of violence of sexual abuse at the Kisléta accommodation site. One house of the site accommodated only a woman and a man, who were not related. The man was disabled (missing the upper part of both feet). The woman - who had been diagnosed as paranoid schizophrenic by the medical institution in Nagykálló beforehand - complained of the man drinking, smoking, harassing and threatening her. She also stated that the man regularly abused her sexually when he got drunk. She repeatedly asked the volunteers and different workers attending them to move her to a different place but to no avail. She wrote a letter in Hungarian with the use of a dictionary to report the assaults to the police but did not know how to send it.

In 2024 and 2025, the HHC knew of one accommodation, (Strázsa Tanya at Szabadszállás) not sponsored by the state, which could tend to the needs of people living with disability or special medical conditions. The HHC has no information if there are any state sponsored accommodation available for vulnerable people.

Risks of human trafficking

As it has been similarly mentioned, no adequate preventive measures specifically targeting persons fleeing Ukraine have been implemented concerning the risks of human trafficking, although the arriving population mainly consisted of women and children and there is substantial lack of information (see [Guarantees for vulnerable groups](#)). In 2024 and 2025, the HHC did not conduct as extensive monitoring visits as it did over the previous years, therefore, risk of human trafficking was not as closely monitored and substantive observations cannot be analysed for the purpose of this report. risks of labour exploitation, as described below in [Access to the labour market](#).

²⁰⁸ Data received from the National General Directorate of Aliens Policing by the HHC on 9 March 2026.

²⁰⁹ UNHCR, *Inter-Agency Operational Update Hungary*, 10 May 2022, available [here](#).

²¹⁰ Recorded first by the HHC on 20 June 2023 at Kisléta during HHC's monitoring mission.

E. Employment and education

1. Access to the labour market

A temporary protection beneficiary or applicant has the same rights regarding employment as Hungarian citizens do, except in the public service and civil servant sector where Hungarian citizenship is a requirement.²¹¹ According to Act L of 2025, beneficiaries and applicants may work in the territory of Hungary without special permission, including temporary employment and public employment.²¹² This has not always been the case as when the TP Decree came into effect on 8 March 2022, only beneficiaries had this right and only in certain sectors of the labour market as defined in the communication of the competent minister.²¹³ This regulation was amended and consequently, not only beneficiaries, but applicants could also be employed in the jobs specified in the mentioned communication.²¹⁴ This regime was in effect from 23 March to 29 April 2022. Since 30 April 2022, as a result of another legislative change, it is possible for both beneficiaries and applicants to be employed in any sector, without any limitation.²¹⁵

To be employed, the applicant or the beneficiary has to be at least 16 years old.²¹⁶ The employer shall notify the immigration authority of the employment of a person under Act L of 2025.²¹⁷ The employer is required to ascertain on or before the first day of employment that the person holds a TP card (if beneficiary) or a humanitarian residence card (if applicant) and shall make a copy of the permit which is to be kept for the entire duration of employment. The employer is then to notify the immigration authority of the start of employment and also of its termination. The detailed rules of notification procedure are set out in the Act XC of 2023 on the general rules of entry and stay of third-country nationals.²¹⁸

Since 29 April 2022, a person who intends to receive the subsistence allowance and who is eligible for employment must register as a service claimant (in Hungarian it is phrased as *foglalkoztatásba bevonható személy*, which would translate as 'a person who can be employed') with the district office and cooperate with the district office before receiving the first regular subsistence allowance.²¹⁹ A person who is eligible for employment shall accept an offer for a suitable job, including public employment, in cooperation with the district office, within 45 days of receiving the first regular subsistence allowance.²²⁰ A person eligible for employment is not obliged to accept the job offered to them if:

- ❖ at the time of the offer of employment, they are in an employment relationship with an employer in Hungary and the employer in Hungary can prove it, or
- ❖ they provide care for a minor under the age of three, or
- ❖ they are enrolled in full-time school education and have not reached the age of 18.²²¹

The integration of healthcare professionals has been facilitated by the government by introducing some rules which make it easier for the healthcare professionals who fled Ukraine to start working in Hungary. Government Decree 121/2022 (III.28.) provides that a person holding a health professional qualification

²¹¹ As provided in Section 39 (1) of Act CXCV of 2011 on Public Service Officials and Section 20 (1) c.) of Act XXXIII of 1992 on Civil Servant Status.

²¹² Sections 20-21 of Act 2025. L.

²¹³ NGM Communication on the authorisation of the employment of third-country nationals in Hungary on the basis of a non-aggregated application procedure, on the exemption from the obligation to obtain an authorisation, on the cooperation of the labour office of the metropolitan and county government office in the aggregated application procedure, and on the notification of the employment of third-country nationals who are employed in Hungary without authorisation and on the reimbursement of wages pursuant to point 26 of paragraph (1) of Article 15 of Government Decree 445/2013 (28.XI.), available in Hungarian [here](#).

²¹⁴ TP Decree as amended by Section 2 of Government Decree 112/2022 (III.22).

²¹⁵ TP Decree as amended by Section 1 of Government Decree 175/2022 (IV.29). now Act L of 2025.

²¹⁶ Section 1 point 1) of Government Decree 196/2025 (VII. 8.)

²¹⁷ Section 20 of Act L of 2025.

²¹⁸ Section 145 of Act XC of 2023 on the entry and stay of third-country nationals.

²¹⁹ Section 17 (5) of Government Decree 196/2025 (VII. 8.).

²²⁰ Section 17 (9) of Government Decree 196/2025 (VII. 8.).

²²¹ Section 21 (2) of Act L of 2025.

obtained in Ukraine, on the basis of a state-recognised qualification and academic degrees, shall - notwithstanding the provisions of Act CLIV of 1997 on Health Care (hereinafter referred to as the - be entitled to perform health care activities without the naturalisation or recognition of his/her professional qualification or professional qualifications in Hungary, even before the recognition or naturalisation procedure has been completed. This person shall, no later than the commencement of the health care activity, be obliged to apply for recognition of the professional qualification or academic degree attested by the certificate or diploma issued in Ukraine in accordance with the provisions of the Act on the Recognition of Foreign Certificates and Diplomas of Act C of 2001 (Recognition Act), but, notwithstanding Article 6(3) of the Recognition Act, the recognition or naturalisation procedure is not subject to the condition of a residence permit issued for the purpose of employment or family reunification.²²²

Government support to employers

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

Between 11 March 2022 and 31 August 2023, the Government provided support to employers to facilitate the employment in Hungary of persons with Ukrainian citizenship or dual Ukrainian-Hungarian citizenship.²²³

Since 1 August 2023, as a result of a legislative change,²²⁴ employers can no longer claim any support for employing people who fled Ukraine but they may claim a housing allowance after those beneficiaries of temporary protection who they employ. Rules may be summarised as follows:²²⁵

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

The application for the allowance can be submitted electronically using the form published on the National Employment Service's website²²⁶ or to the government office responsible for the place where the employee is employed. The allowance is paid to the employer on a monthly basis and is normally equal to the monthly accommodation allowance under the accommodation contract.

The allowance shall cease if

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

²²² Section 2 of Government Decree 121/2022 (III.28.).

²²³ Based on Section 1 of Government Decree 96/2022 (III.10), which is not in effect since 1 August 2023.

²²⁴ Introduced by Government Decree 337/2023 (VII.24.) amending the provisions of Government Decree 104/2022 (III.12.).

²²⁵ Sections 4-10 of Government Decree 196/2025 (VII. 8.)

²²⁶ Available [here](#).

The Ministry of Economic Development in its response to the HHC's freedom of information request asking for the number of registered employment-seekers with international protection stated that as of 31 December 2025, 6 beneficiaries of TP were registered as employment-seekers.²²⁷

Labour market integration opportunities organised by the civic sphere

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

According to the Hungarian Maltese Charity Service, their project called 'Work for you' has been set up specifically for the labour market integration of third-country nationals and is accessible for applicants and beneficiaries of temporary protection too. In 2022, 14 beneficiaries of temporary protection participated in their programme called MMIA, which is a housing project but also provides labour market assistance services. The Hungarian Maltese Charity Service furthermore reported that they had run their labour market integration programme in 2023. They had 15 beneficiaries of temporary protection clients within their programme, of which 3 persons managed to get employed with their help. They also reported that the programme called 'Incopora', run by the one of the non-profit companies established by the Maltese Charity Service, helped beneficiaries to get integrated into the Hungarian labour market by providing them with mentoring.²²⁸ The Hungarian Maltese Charity continued their efforts and cooperated with various labour-integration services and programmes also throughout 2024 and 2025.²²⁹

Menedék Association runs a complex integration programme involving facilitation of access to the labour market, information provision for employers, mediation of intercultural conflicts in the workplace. Their complex integration programme continued throughout 2025.²³⁰

The Evangelical Lutheran Diakonia also ran their labour-integration services via the 'Workconnect' programme in 2024. In 2024, they also provided adult training for 24 people: personal and property guard, nanny, manicure, eyelash and photographer training.²³¹ They continued their support also in 2025. Their services include labour market counselling, and around 150 people were helped in job seeking.²³²

In 2025, IOM supported the labour market integration of refugees primarily through labour market counselling activities in 2025. IOM also delivered individual and group labour market counselling sessions, carried out preparatory activities for the development of thematic labour market trainings, and made preparatory steps for job fairs and job-matching events in 2025.²³³

The Hungarian Red Cross held nationwide language training, as well as classes in Győr-Moson-Sopron county to promote labour market integration as part of their social work.²³⁴

Caritas Hungary provided labour market-oriented social work services, where they help refugees gaining knowledge and skills useful to find employment. They also provided Hungarian as a foreign language classes in 2025.²³⁵

In 2025 the Hungarian Interchurch Aid implemented programs to support labour market integration, which included the provision of complex integration services through their Ukrainian Refugee Support Center,

²²⁷ Information received from the Ministry of Economic Development by the HHC on 19 March 2026.

²²⁸ Information received from the Hungarian Maltese Charity Service by the HHC on 26 February 2024.

²²⁹ Information received from the Hungarian Maltese Charity Service by the HHC on 19 January and 2 February 2023 and 10 February 2025. More information is available here.

²³⁰ Information received from Menedék Association by the HHC on 128 February 2026.

²³¹ Information received from the Evangelical Lutheran Diakonia by the HHC on 28 February 2025

²³² Information received from the Evangelical Lutheran Diakonia by the HHC on 24 February 2026.

²³³ Information received from the IOM by the HHC on 27 January 2026.

²³⁴ Information received from the Hungarian Red Cross by the HHC on 7 January 2026.

²³⁵ Information received from Caritas Hungary by HHC on 14 January 2026.

labour market integration training sessions, labour market integration workshops and individual labour market counselling.²³⁶

In 2025, the Jesuit Refugee Service provided Hungarian as a foreign language classes developed and launched for adults, with the aim of promoting labour market integration.²³⁷

The Kalunba Association has a project offering complex integration services supported by EU funds, similarly to last year. Further information on the project is however unavailable, as they failed to answer HHC's information request.²³⁸

Barriers to employment

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

Discrimination based on a genuine and determining occupational condition which is justified by the nature of the work or working conditions, pursuing a legitimate aim and is proportionate, and discrimination based on religion or belief, or on national or ethnic origin, directly arising from an ethos which is fundamental to the nature of the organisation, justified by the content or nature of the particular occupational activities, and which is proportionate and based on a genuine occupational requirement, do not constitute a breach of the requirement of equal treatment.²³⁹

Naturally, however, the most recurrent reasons for unemployment in the population of concern are the inability to find work due to lack of language skills, especially among those not accommodated at collective sites and having master degrees.²⁴⁰ Menedék Association also points out that the expectations of employers and the reality of Ukrainian refugees are not corresponding as most labour market programmes aim at involving highly-qualified individuals with more diverse language skills.²⁴¹ Next Step Hungary Association suggested that in 2022 labour market integration of Ukrainian refugees was also hindered by the fact that there were not enough institutions carrying out skill validation, therefore, otherwise experienced people could not substantiate their qualifications.²⁴² The Next Step Association reported the same concerns in 2025.

Menedék Association highlighted that in 2023-2024 the challenge in the arena of for-profit companies was that the labour market expectations and realities were different, in many cases the programmes targeted highly qualified people, but the lack of language skills (Hungarian and English) prevented those who have fled Ukraine from joining these programmes. In 2025, Menedék Association highlighted that there were no significant positive developments in this regard. While the recognition of diplomas and certificates obtained for all refugees was not free of charge, but in case of Ukrainian citizens, a fee exemption could be requested, and in case of justifiable reasons, the presentation of original documents (e.g. course list) was not required and the Educational Authority has prepared a certified translation based on the submitted document.

A specific practical problem mentioned in the report of Menedék Association for a Ukrainian client was that the Authority did not find the translation of the diploma to be appropriate, and after submitting the new translation, the Educational Authority considered it necessary to involve an expert, who had to be

²³⁶ Information received from the Hungarian Interchurch Aid on 6 January 2026.

²³⁷ Information received from the Jesuit Refugee Service on 9 March 2026.

²³⁸ See: <https://www.kalunba.hu/actual-projects>.

²³⁹ Section 22 (1) of Act CXXV of 2003 on equal treatment and the promotion of equal opportunities.

²⁴⁰ UNHCR, *Hungary: Multi-Sectoral Needs Assessment*, November 2022, available [here](#), 16.

²⁴¹ Information received from Menedék Association by the HHC on 28 February 2023.

²⁴² Information received from Next Step Hungary Association on 1 February 2026.

paid an additional fee. The expert was involved in October 2025, but since then there has been no decision on the recognition of the diploma.²⁴³

In 2025, in IOM's experience beneficiaries of temporary protection often face underemployment, as they experience significant difficulties in securing adequately paid positions that match their education and professional qualifications. This is mainly due to difficulties experienced in the recognition of diplomas and professional qualifications. In addition, beneficiaries commonly encounter language barriers, limited awareness of their legal rights and employment opportunities, and challenges related to the recognition of prior work experience, all of which further constrain their access to the labour market.²⁴⁴

There is no official data available on how many temporary protection beneficiaries could access the labour market in Hungary so far. The ministry competent in employment matters stated upon the freedom of information request of the HHC in 2023 that they did not have this data.²⁴⁵ Consequently no such information request was sent since then.

Risks of labour exploitation

The presence of online recruitment agencies tackling fresh arrivals and those without a temporary protection status is particularly concerning, as well as the recruitment of workers for badly or unpaid seasonal, informal or other physical jobs. (Please also see the section of risks of human trafficking under Housing). UNHCR pointed out that in 2024 people from Ukraine who found work, earned 35% less than the national average wage, further exacerbating economic insecurity.²⁴⁶

Menedék Association launched a project called SAFEmployment Hungary throughout 2022-2023 to specifically tackle and prevent the potential labour exploitation of the population fleeing Ukraine.²⁴⁷ Within the programme, Menedék Association initiated a four-language information campaign (in Hungarian, English, Ukrainian, Russian) conveying the most important information about the rights of employees, as well as how to recognise exploitation. Moreover, they provide complex help through their qualified social workers for victims of exploitation. This project of Menedék Association has also been promoted by the asylum authority on their website²⁴⁸ and physically on leaflets in the asylum client services. Within the project, Menedék Association produced 3 videos, raising attention to the dangers of labour exploitation.²⁴⁹ In 2025, concerns regarding labour exploitation remain valid but, there are no projects known to HHC that work on the issue. The information materials provided by Menedék Association are still available, and the Association still provides consultations to possible victims of labour exploitation.²⁵⁰

2. Access to education

Education in Hungary is a right and obligation for children who fled Ukraine: the law does not only provide education for foreign children (not only applicants and beneficiaries of temporary protection) but obliges them to take part in it. According to the Act on Public Education, children, in the year when they turn 3 years old until 31 August, are to go to kindergarten for at least 4 hours a day.²⁵¹ In the year when the child turns 6 years old until 31 August, the child may be enrolled and is to attend school. This can be delayed by a year upon request of the parent. Education is compulsory until the end of the school year when the

²⁴³ Information received from Menedék Association by the HHC on 21 February 2024 and 21 February 2025 and on 1 February 2026.

²⁴⁴ Information received from the IOM by the HHC on 27 January 2026.

²⁴⁵ Information received from the Ministry of Economic Development by the HHC on 27 January 2023.

²⁴⁶ UNHCR, 2024 End-of-Year Report - Refugee Response Plan for the Ukraine situation, p 25, 19 March 2025 available [here](#).

²⁴⁷ Safemployment Hungary project on Menedék Association's website: [here](#).

²⁴⁸ Safemployment Hungary project on the NGDAP's website, [here](#).

²⁴⁹ Videos available [here](#), and [here](#).

²⁵⁰ Safemployment Hungary project on Menedék Association's website: [here](#).

²⁵¹ Section 8(2) of Act CXC of 2011 on Public Education.

child turns 16 years old, but for children with special educational needs this may be extended until they turn 23 years old. The obligation to get education can be fulfilled in primary, secondary schools and also in schools for children with special needs.²⁵²

The right to education of temporary protection applicant and beneficiary children is also foreseen by the Act on Public Education, which asserts that upon submitting the application, the child becomes entitled to take part in public education in kindergarten, dormitory care, specialised pedagogical services, school education until the end of his studies that begun before their age of eighteen. The law states that this may be done on the same conditions as Hungarian citizens.²⁵³ Act L of 2025 also provides that if the temporary protection beneficiary cares for a minor, they are entitled to use the services of crèches, nursery cares and the services of the "Biztos Kezdet" children's home under the same conditions as Hungarian citizens.²⁵⁴ Lastly, in the set of legal instruments providing for the education of temporary protection beneficiaries, the Asylum Decree holds that the beneficiary is entitled to the reimbursement of the cost of education.²⁵⁵

Day care in crèches is regulated under Act XXXI of 1997 on child protection and childcare administration. The law provides that day care is mainly for the children of working parents, but other needs (e.g. children at risk due to their social situation or children of a single parent or a parent's illness, etc.) may be considered. However, it is generally subject to a fee depending on the family's income, and free of charge only on grounds of need.²⁵⁶

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

The Educational Authority stated in its response sent to the HHC that they registered aggravated data concerning refugee and beneficiary of temporary protection children for the educational years of 2022-2023, 2023-2024, 2024-2025 and 2025-2026 as follows:²⁵⁷

Enrolled asylum-seeking, refugee and beneficiary of temporary protection children				
	2022/2023	2023/2024	2024/2025	2025/2026
Kindergarten	619	481	401	379
Elementary school	2,009	1,898	1805	1812
High school	118	105	218	154

One of the main barriers in accessing Hungarian (public) education of any level may be the fact that people who fled from Ukraine do not know the Hungarian language. Legislation supports the beneficiaries of temporary protection in overcoming this barrier as the Asylum Decree provides that within twenty-four months from the date of recognition, the participation of the beneficiary of temporary protection in 520 hours of basic or intermediate Hungarian language course at an institution designated by the NDGAP is free of charge, if the person continues his/her studies in accordance with the conditions set by the institution or meets the examination requirements set by the language service provider.²⁵⁸ The law furthermore provides that once per grade and per type, a basic or intermediate Hungarian language examination of type "A", "B" or "C", organised by the institution designated by the asylum authority and

²⁵² Section 45 (2)-(3) and (5) of Act CXC of 2011 on Public Education.

²⁵³ Section 92 (1) a.), (3)-(4) of Act CXC of 2011 on Public Education.

²⁵⁴ Section 23 of Act L of 2025.

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

²⁵⁶ Ministry of Human Resources, *Information to support families from Ukraine for family and child welfare service providers*, May 2022, available at: <https://bit.ly/3HXccxG>, 15.

²⁵⁷ Information received from the Educational Authority by the HHC on 7 February 2024, on 5 February 2025 and on 17 March 2026.

²⁵⁸ Section 51 (1) of the Asylum Decree

recognised by the state, and a Hungarian language course for a beneficiary studying in full-time school education - until reaching the age of 18 - in the institution designated by the asylum authority is free of charge.²⁵⁹ The HHC requested data from the NDGAP regarding the implementation of the said provisions. The NDGAP stated in its answer that no institution was designated for Hungarian language courses, that no request was submitted to them by anyone concerning a Hungarian language exam and that no institution was designated specifically for the minor beneficiaries of temporary protection, should they wish to attend Hungarian language courses.²⁶⁰

Practical challenges to accessing public education

Organisations assisting people fleeing Ukraine identified many other practical challenges faced by children when trying to access public education in 2025 as well.

First, kindergartens and schools often refused to receive children from Ukraine, despite their parents having submitted an application on time at the competent institution. The competent institution is where the child belongs based on their address. In 2025, similar issues were recorded by Menedék Association, the Evangelical Lutheran Diakonia and the Jesuit Refugee Service, especially in the case of Roma children.²⁶¹ Caritas Hungary also reported cases where kindergartens only allowed children with temporary protection status to stay for half of the day, which significantly hampered the efforts of the mothers of the children to find employment. With individual mentoring, this issue could be solved.²⁶²

According to Menedék Association a significant problem in education is the case of students who are under-socialized or not socialized according to their age. There are no guiding practices for the classification and catch-up of these children, and in such cases, the school often takes no measures. There were also cases where the principal of the elementary school clearly stated that they would not admit Ukrainian children to their institution despite being legally obliged as a district school to admit the child.²⁶³ The Jesuit Refugee Service and Evangelical Lutheran Diakonia reported about the discriminatory experiences Roma people face when it comes to enrolling their children to schools.²⁶⁴

Apart from intentional hostility in some cases, families also faced language barriers and other administrative difficulties - such as the lack of documents - during enrolment and admission procedures, limiting parents' ability to navigate the education system and communicate with schools.²⁶⁵ In the case of disadvantaged families, illiteracy of the parents was another problem hindering enrollment to schools.²⁶⁶ Moreover, the draconian limitations on eligibility for state-sponsored accommodation (see above, at housing) meant that many families had to move often, which made it impossible for them to keep their children in one school for a long time.²⁶⁷

Actors of the civic sphere recognised the need to teach Hungarian as a foreign language to Ukrainian students. Almost all organizations reported that the language barrier is one of the most important problems

²⁵⁹ Section 51 (2) of the Asylum Decree

²⁶⁰ Information received from the NDGAP by the HHC on 2 April 2024.

²⁶¹ Information received from Menedék Association on 4 February 2026, from the Evangelical Lutheran Diakonia on 24 February 2026 and from the Jesuit Refugee Service 9 March 2026 by the HHC.

²⁶² Information received from Caritas Hungary by the HHC on 14 January 2026

²⁶³ Information received from the Menedék Association by the HHC on 4 February 2026.

²⁶⁴ Information received from the Evangelical Lutheran Diakonia on 24 February 2026 and from the Jesuit Refugee Service on 9 March 2026 by the HHC.

²⁶⁵ Information received from IOM on 27 January 2026 and the Evangelical Lutheran Diakonia by on 24 February 2026 by the HHC.

²⁶⁶ Information received from the Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI) by the HHC on 20 February 2026.

²⁶⁷ Information received from IOM on 27 January 2026 and the Evangelical Lutheran Diakonia on 24 February 2026 by the HHC.

children from Ukraine face in the Hungarian education system.²⁶⁸ As Menedék Association reports, the language barrier is the main reason for which Ukrainian children cannot perform in accordance with their skills and abilities. The Association points out that language difficulties are completely ignored by the unified admission system.²⁶⁹ Teaching Hungarian as a foreign language is one of the main activities of the Jesuit Refugee Service which is aimed at supporting inclusion in Hungarian schools. Further, it offered weekly Hungarian as a foreign language classes and informal support talks for unaccompanied minor children in the Károlyi István Children Home in Fót.²⁷⁰ Caritas Hungary reported that they held Hungarian language courses for people from Ukraine.²⁷¹

While the overall picture of available language courses and integration support in Hungarian public schools is quite bleak, there are also a few positive examples. Menedék Association mentioned that the 6th district municipality in Budapest organized Hungarian as a foreign language classes for foreigners living or working in the district, and organized such trainings for teachers as well.²⁷² The Evangelical Lutheran Diakonia also reported about a number of schools, both in Budapest and in other cities, where the school provided language classes and individual mentoring to ensure the better integration of children from Ukraine²⁷³. The Hungarian Interchurch Aid reported on the emergence of Ukrainian-Hungarian bilingual institutions that incentivized parents to take their children to school and report good experiences with the educational level of said institutions.²⁷⁴

A number of self-organized, Ukrainian-led organizations also emerged to help Ukrainian children continue their education in Hungary. As mentioned above, Taras Shevchenko Bilingual Ukrainian Nationality Primary and Secondary School,²⁷⁵ started its operation in September 2025. Moreover, the Unity Ukrainian Association provided Saturday School for children between the age of 3-15 in Ukrainian language,²⁷⁶ and Ukrainian Hope Association organized afternoon study sessions and preparational courses to help Ukrainian children keep up with their peers in Hungarian schools.²⁷⁷ Both organizations operated in Budapest.

Finally, a serious shortcoming of the Hungarian education system is that the upper age limit of mandatory public education is the age of 16, instead of 18. Therefore, education institutions have no obligation to admit children over the age of 16, which made it extremely difficult for that age group to gain admittance to and continue their education in Hungarian schools.²⁷⁸

Once the children managed to get enrolled, a systemic problem in reception into schools has been the lack of assistance in integrating non-Hungarian speaking children. Apart from the language difficulties detailed above, IOM, the Hungarian Red Cross and Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI) reported that the difference between the Hungarian and Ukrainian education system also presented a challenge and made it more difficult to children to continue their education

²⁶⁸ Information received from the Evangelical Lutheran Diakonia on 24 February 2026, from Menedék Association on 4 February 2026, from the Jesuit Refugee Service on 9 March 2026 from the Hungarian Red Cross on 9 January 2026; from the Interchurch Aid on 9 January 2026, from IOM on 27 January 2026 and from the Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI) on 20 February 2026 by the HHC.

²⁶⁹ Information received from the Menedék Association by the HHC on 4 February 2026.

²⁷⁰ Information received from the Evangelical Lutheran Diakonia by the HHC on 24 February 2026.

²⁷¹ Information received from Caritas Hungary by the HHC on 14 January 2026

²⁷² Information received from Menedék Association on 4 February 2026

²⁷³ Information received from the Evangelical Lutheran Diakonia by the HHC on 24 February 2026

²⁷⁴ Information received from the Hungarian Interchurch Aid on 9 January 2026 by the HHC.

²⁷⁵ The website of the school is available [here](#)

²⁷⁶ See: <https://tinyurl.com/yc7n7uvm>.

²⁷⁷ See: <https://tinyurl.com/5edyd9mm>.

²⁷⁸ Information received from IOM on 27 January 2026 and from Menedék Association on 4 February 2026 by the HHC.

uninterrupted.²⁷⁹ The lack of MHPSS services and preparedness of schools to accommodate children who suffered from war-related trauma or other mental health issues.²⁸⁰ IOM and Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI) also reported instances of bullying.²⁸¹

Menedék Association, IOM and the Jesuit Refugee Service emphasised, that greatest challenges in the education system is affecting those children who are to leave elementary school and go to high-schools as high-schools normally require an entry exam, which is to be taken in Hungarian.²⁸² These occurrences highlight that not only the children, but also the schools have been in need of assistance and centralised support in tackling these language barriers.

The Hungarian Interchurch Aid, Caritas Hungary, the Jesuit Refugee Service and the Hungarian Red Cross reported that they organised child-supervision services or organized summer break activities in 2025.²⁸³

Menedék Association has a guide on the most essential information on the Hungarian education system for parents, available in Ukrainian, English and Hungarian.²⁸⁴ ²⁸⁵ Staff member of the Association furthermore authored a study on the integration of foreign children into Hungarian education.²⁸⁶

Children with special needs

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

A child with special educational needs is defined as a child who, according to an expert opinion of the competent body under the Act on Public Education, has a motor, sensory (visual, auditory), mental or speech disability, multiple disabilities, an autism spectrum disorder or other mental development disorder, including severe learning, attention or behavioural disability.²⁸⁷ These children shall have the right to receive pedagogical, remedial or conductive educational care appropriate to their condition. The care appropriate to the special educational needs must be provided in accordance with the expert opinion. The parent may choose the educational establishment providing appropriate care for children with special educational needs on the basis of the expert opinion of the competent expert committee, taking into account the needs and capacities of the parent and the child. The education of these children is to be carried out in institutions established for the specific purpose of educating children with special needs. If

²⁷⁹ Information received from IOM on 27 January 2026, from the Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI) on 20 February 2026 and the Hungarian Red Cross on 9 January 2026 by the HHC.

²⁸⁰ Information received from IOM on 27 January 2026; from the Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI) on 20 February 2026 and from the Hungarian Red Cross on 9 January 2026 by the HHC.

²⁸¹ Information received from IOM on 27 January 2026 and from the Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI) on 20 February 2026 by the HHC.

²⁸² Information received from Menedék Association on 4 February 2026, from IOM on 27 January 2026 and the Jesuit Refugee Service on 9 March 2026 by the HHC.

²⁸³ Information received by Interchurch Aid on 9 January 2026, from Caritas Hungary on 14 January 2026, from the Hungarian Red Cross on 9 January 2026, and the Jesuit Refugee Service on 9 March 2026 by the HHC.

²⁸⁴ Menedék Association: Going to Kindergarten and School in Hungary: a parent's guide to the Hungarian Education System, available, [here](#).

²⁸⁵ Positive stories – foreign children in Hungarian schools, available [here](#).

²⁸⁶ Éva Füredi: Külföldi gyerekek iskolai integrációja Magyarországon – szükségletek, lehetőségek és kihívások, Modern Nyelvvoktatás, 2023/3-4, available in Hungarian [here](#).

²⁸⁷ Section 4 point 25. of Act CX of 2011 on Public Education.

children have difficulties in integration, learning or behaviour, they are entitled to developmental pedagogical care.²⁸⁸

Regarding the practical challenges children with special needs face in the Hungarian education system, the Cordelia Foundation noted that such children, placed in accommodations outside of Budapest has virtually no access, in practice, to any institutions that could provide appropriate care. Therefore, these children often do not go to school at all putting additional burden on their parents who have to stay home with them. IOM noted that children with special education needs face obstacles for obtaining expert's opinion and official diagnoses needed for their enrolment in special needs education.²⁸⁹ Menedék Association also noted that schools often do not have the capacity to provide children with special needs with necessary care.²⁹⁰ The Evangelical Lutheran Diakonia reported about a case where the school refused to admit a children with special needs, despite having staff to assist such children, claiming language difficulties.²⁹¹

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

Higher education

Beneficiaries of temporary protection may be admitted into higher education under the same conditions as Hungarian citizens and they are eligible for state-subsidised education in line with Act CCIV of 2011 on Higher Education.²⁹² In practice, however, there are gaps in enforcing the rights of the refugee population in higher education (see [General Report – Access to education](#)).

Data on the number of TP holders in higher education is unfortunately not available.²⁹³ Students and teachers who would like to stay in Hungary can apply to the [Students at Risk Programme](#) which was launched in 2022 by Tempus Public Foundation in the frame of the Stipendium Hungaricum Scholarship Programme supervised by the Ministry of Foreign Affairs and Trade, with the aim to provide higher education scholarships supporting the students in continuing their studies that they started in Ukraine and earning a bachelor's, master's or doctoral degree in Hungary. In 2025 the scholarship was available only to Ukrainian citizens.²⁹⁴ UNHCR reported in 2024 that the participants of their survey who were already in university expressed concerns regarding the costs of education, and in particular, the fact that scholarships are deemed insufficient to cover even the most basic costs, such as accommodation.²⁹⁵ The Stipendium programme was ongoing in 2025 too.

Menedék Association shared that the 'Student at Risk' scholarship program of Stipendium Hungaricum has become more known and popular among students from Ukraine in 2025 as it enables them to study in higher education without the knowledge of Hungarian language and they can also enrol with having completed high-school online.²⁹⁶

In Caritas Hungary's experience, most young people whom they are in contact with are able to take part in higher education or in vocational courses.²⁹⁷ The Jesuit Refugee Services shared that in their

²⁸⁸ Section 47 of Act CXC of 2011 on Public Education.

²⁸⁹ Information received from the IOM by the HHC on 27 January 2026.

²⁹⁰ Information received from Menedék Association on 4 February 2026

²⁹¹ Information received from the Evangelical Lutheran Diakonia by the HHC on 24 February 2026.

²⁹² Article 39 (1)b.) of Act CCIV of 2011 on Higher Education.

²⁹³ Information received from the Educational Authority by the HHC on 16 March 2026.

²⁹⁴ Programme description available [here](#).

²⁹⁵ UNHCR, *Hungary: Socio-Economic Insights Survey, Final Report*, October 2024, available [here](#), p 22.

²⁹⁶ Information received from Menedék Association by HHC on 4 February 2026.

²⁹⁷ Information received from Caritas Hungary by HHC on 14 January 2026.

experience vocational courses are more easily accessible to Hungarian-Ukrainian dual citizens, who speak Hungarian, while Ukrainian speaking beneficiaries of temporary protection are more likely to enrol in English-language higher educational courses.²⁹⁸ In the experience of the Red Cross, young people can access both vocational and higher education. They think that motivation, mentoring, the appropriate language skills and assistance from civil society organizations have significant potential to promote accessing higher education.²⁹⁹ Based on the experiences of the Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI) young people tend to attend vocational courses rather than university as many boys are considered as adults at the age of 16 and then will join the labour market.³⁰⁰ The Evangelical Lutheran Diakonia shared that 4-5 people could apply for higher education in 2025.³⁰¹

F. Social welfare

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

Maternity allowance is the only available benefit outside the scope of asylum administration, which may be accessed by any woman legally resident in Hungary at the time of applying for maternity allowance and who attended antenatal care in Hungary at least four times during their pregnancy, or at least once in the case of premature birth, in line with the provisions of Act LXXXIV of 1998 on aiding families.³⁰² This support may be requested after the child is born. If the child is a foreign national, then the request is to be submitted at the competent Government Office.³⁰³

As temporary protection beneficiaries are generally not entitled to access the benefits of the social welfare system, only maternity allowance could be requested in 2025. The HHC and assistance partners do not have particular experience in this regard in terms of obstacles faced, contrary to those met when receiving the [subsistence allowance](#). The UNHCR also highlights that in Hungary relevant legislation fails to include temporary protection beneficiaries in a wide range of social protection benefits, including family allowances for households with a disabled child.³⁰⁴

A positive development is to be noted. Namely, since 1 January 2024, the scope of available social benefits has been broadened and childcare and infant care allowance is available for those Ukrainian parents, who work in Hungary and whose child was born after 31 December 2023, even if their official residence is registered in Ukraine. This has been a result of a legislative amendment of a government decree, which previously required beneficiaries of these allowances to have an official Hungarian residence, which, naturally, most people who fled Ukraine did not have. The legislative change, however, states that a place of accommodation in Hungary shall be regarded as official residence, thereby making Ukrainian workers eligible to the benefits.³⁰⁵ This development may be attributed to the advocacy efforts of Menedék Association.³⁰⁶

²⁹⁸ Information received from the Jesuit Refugee Services by HHC on 9 March 2026.

²⁹⁹ Information received from the Red Cross by HHC on 7 January 2026.

³⁰⁰ Information received from the Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI) by the HHC on 20 February 2026.

³⁰¹ Information received from the Evangelical Lutheran Diakonia by the HHC on 24 February 2026.

³⁰² Section 29 (4) of Act LXXXIV of 1998 on aiding families.

³⁰³ Section 35 of Act LXXXIV of 1998 on aiding families.

³⁰⁴ UNHCR, *The situation of vulnerable refugees from Ukraine*, 13 January 2025, p 3, available [here](#).

³⁰⁵ Gov. Decree 623/2023 (XII.23) amending Gov. Decree 246/2022 (VII.8)

³⁰⁶ Information received from the Menedék Association by the HHC on 21 February 2024.

No data available as to the number of beneficiaries of temporary protection who accessed different forms of social welfare as of 31 December 2025.

G. Health care

Access to health care is provided both to temporary protection beneficiaries and applicants. The scope of services to which they are entitled is specifically defined in the Asylum Decree³⁰⁷ and Government Decree 196/2025 (VII. 8.).³⁰⁸ These services are:

- A. examinations and treatment under the scope of general medical care (in practice these means the treatment generally provided by the district GP),³⁰⁹
- B. examination and treatment in emergency outpatient care, and medicines and dressings used in the course of such care;
- C. in-patient care in case of urgent need, and medical treatment prescribed by a doctor, including surgical operations and the medical materials and prostheses used, medical care, medicines, dressings and meals;
- D. following specialised out-patient care or in-patient hospital treatment, until recovery from the illness or until stabilisation of the condition:
 - a. the necessary examination and treatment,
 - b. medicinal products other than those referred to in point (h) which cannot be substituted for another medicinal product and medical devices necessary for the administration of the medicinal product;
- E. medical appliances other than those referred to in point (D)(D(b)) ordered by a doctor, and their repair;
- F. emergency dental care and treatment for the preservation of teeth, provided that the treatment is of the lowest reimbursement category;
- G. prenatal care and obstetric care or, under the conditions laid down in the Act on the Protection of Foetal Life, for an operation to terminate a pregnancy;
- H. medicines and dressings prescribed free of charge for "persons entitled to public health care" under a special law or with a 90% or 100% social security subsidy under a "health care provision";
- I. in the case of benefits under points (B) and (C), (D)(D(a)) and (G), transport of a patient if, because of their state of health, transport cannot be provided otherwise;
- J. compulsory vaccination linked to age,
- K. examination and treatment in oncological care and other chronic care, and medicinal products used by persons entitled to social security benefits for the purpose of improving, maintaining or relieving pain in the context of specialised oncological care and other chronic care and general health care with price support.

Barriers to accessing health care

UNHCR stated in 2025 that 22% of those who fled to Hungary from Ukraine with health needs reported being unable to access medical care in Hungary. The primary obstacles are language barriers (54%), long waiting times (33%), difficulties making appointments (26%).

The proportion of households with a chronically ill member has increased from 33% in 2023 to 57% in 2025.³¹⁰

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

³⁰⁷ Sections 26-28 and 44(2) of Asylum Decree.

³⁰⁸ Section 3.(1) of Government Decree 196/2025 (VII. 8.) .

³⁰⁹ As provided in Act CXXIII of 2015 on general medical care.

³¹⁰ UNHCR, *Hungary: Socio-Economic Insights Survey*, February 2026, available [here](#).

Menedék Association,³¹¹ the Evangelic Lutheran Diakonia³¹², Maltese Charity Service,³¹³ The Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI)³¹⁴ and the Interchurch Aid,³¹⁵ health care providers frequently do not know what health-care benefits are TP beneficiaries entitled to: they do not know how to register patients without a social security number, which is provided to those with a registered address and address card, having social security status. Without registration, the cost of healthcare services is not covered. The cloud-based prescription writing and refills are not feasible in the absence of EESZT which is often a problem for TP beneficiaries.³¹⁶

Temporary protection applicants and beneficiaries (and dual - Ukrainian-Hungarian citizens) however, do not have an address card or social security card, as they are normally accommodated in a temporary manner, and as long as they lack employment, they cannot obtain social security status either. Therefore, if they turn to a health care provider, they are frequently sent away, for the health care providers fears that the expenses will not be reimbursed by the state. This was a significant and duly documented issue both in 2022, 2023, 2024 and 2025. The HHC recorded such cases in Pest, Heves Komárom-Esztergom and Szabolcs-Szatmár counties. It was documented multiple times by the HHC that people from Ukraine complained that they were refused to be provided with health-care services at the local hospitals on the account of their Ukrainian nationality or Roma ethnicity.

The Evangelical Lutheran Diakonia also reported on how temporary protection applicants and beneficiaries (and dual - Ukrainian-Hungarian citizens) are still often asked for their social security card. During pregnancy, they are billed for treatments such as ultrasound. In other cases, for stroke care. A minor with terminal cancer could not receive free medicine and was told to obtain a social security number, which they couldn't do. Lack of such status makes appointment booking impossible as well due to the nature of the booking system.

Furthermore, in case of a person being employed, the issuing of a social security status would be obligation of the employer, but the employer generally places the responsibility at the Ukrainian or dual citizen refugee, who often times are not properly informed on this process and obligations, the Evangelical Lutheran Diakonia.³¹⁷

As indicated under the previous point, applicants and beneficiaries of temporary protection in need are to be provided with a broad set of health care services. In order to manage their registration by health care providers, Government Decree 171/2022 (IV.29) introduced some executive regulations, instructing health care providers on how to register temporary protection applicants, beneficiaries and Hungarian-Ukrainian citizens who fled the war. Since 20 July 2025, the provisions of Government Decree 171/2022 (IV.29.) were transposed to Section 36/D of Act XLVII of 1997 on the use and protection of healthcare data and health-related personal data. The Act provides that health care providers are to use a special, technical identification number instead of the social security number. It furthermore provides that the number of the TP card and humanitarian residence card, and the number of personal ID documents are to be registered.³¹⁸ The cost of health care service is then to be reimbursed by the asylum authority.³¹⁹ These legal provisions are, as pointed out above too, unknown by some of the health-care providers. Therefore, the intervention and assistance of lawyers and social workers of NGOs assisting the refugee

³¹¹ Information received from Menedék Association by the HHC on 28 February 2023, 21 February 2024 and 21 February 2025.

³¹² Information received from the Evangelic Lutheran Diakonia by the HHC on 24 February 2024 and on 28 February 2025.

³¹³ Information received from the Maltese Charity Service by the HHC on 10 February 2025.

³¹⁴ Information received from the Budapest Methodological Centre of Social Policy and Its Institutions (BMSZKI) by the HHC on 20 February 2026.

³¹⁵ Information received from the Hungarian Interchurch Aid by the HHC on 6 January 2026.

³¹⁶ Information received from the Hungarian Interchurch Aid by the HHC on 6 January 2026.

³¹⁷ Information received from the Evangelic Lutheran Diakonia by the HHC on 24 February 2026.

³¹⁸ Section 2 of Government Decree 171/2022 (IV.29).

³¹⁹ Ministry of Human Resources, *Information to support families from Ukraine for family and child welfare service providers*, May 2022, available [here](#), 13.

population, who could explain the procedure to be followed to the health care providers have been frequently needed.

The IOM reported the following obstacles beneficiaries of temporary protection had to face while trying to access public healthcare in 2025³²⁰

- ❖ Lack of knowledge and uncertainty among healthcare professionals regarding applicable legislation, healthcare entitlements, and valid documentation for TP holders;
- ❖ Absence of TAJ (social security) cards for beneficiaries of temporary protection represents a core structural barrier. Although TP holders have extensive healthcare entitlements in principle, the lack of a TAJ card limits their ability to fully access services in practice, including GP registration, prescription subsidies, continuity of care, and access to medical history;
- ❖ Misinterpretation of procedures and limited use of the technical identifier introduced to replace the TAJ card. While a temporary, individual technical identifier exists and enables electronic recording of care through EESZT, its implementation remains weak, and many providers are unaware of its existence or uncertain about its use;
- ❖ Language barriers significantly constrain communication between TP holders and healthcare providers and remain the most tangible obstacle to accessing care, affecting both initial registration with general practitioners and the quality of ongoing care;
- ❖ Limited awareness and underutilization of interpretation services, including the free central telephone interpreting service (1812) and IOM-supported interpretation. Both beneficiaries and healthcare providers are often unaware of these options, resulting in low uptake;
- ❖ Pharmacy-related barriers to accessing subsidized medicines, linked to both limited awareness of TP entitlements and technical constraints in GP software systems. In many cases, prescriptions cannot be issued at normative (subsidized) prices, and pharmacists are unable to correct full-price prescriptions even when subsidy eligibility is evident;
- ❖ Structural barriers within primary healthcare (GP services), as TP holders cannot be formally registered as long-term patients due to the lack of a TAJ card or residence card. As a result, they are treated as occasional patients, limiting access to full medical histories and reducing incentives for GPs to provide consistent and comprehensive care;
- ❖ Challenges in maternal and child healthcare, particularly for newborns of TP holders. Administrative delays and unclear procedures related to identifiers and entitlements for newborns have resulted in complications with vaccinations, specialist referrals, and routine examinations;
- ❖ Additional barriers for TP holders with chronic conditions, disabilities, or limited mobility, particularly related to the acceptance of Ukrainian medical documentation and recognition of pre-existing conditions, which may lead to delayed treatment or restricted access to specialized services.

The Jesuit Refugee Service also reported that the need of accurate interpretation for the language barriers was still a significant issue in 2025.³²¹

According to Caritas Hungary, access to emergency care for families has not been hindered. In some cases, however, there are significant barriers to accessing specialist care, because the beneficiaries are not being employed or insured. The exceptions to this are access to specialist care and hospital care in cases of urgent need, and sheltered persons requiring special treatment (e.g., unaccompanied minors, elderly, disabled, pregnant women). Caritas Hungary provided health screenings, aiming to ensure access to appropriate services. In addition to providing screenings, the charity helps families access appropriate additional tests. This is provided on an ongoing basis. Their Integration Centre staff (Ukrainian-Hungarian speaking) also personally accompanies families to overcome language barriers and

³²⁰ Information received from the IOM by the HHC on 27 January 2026.

³²¹ Information received from the Jesuit Refugee Service by the HHC on 9 March 2026

to ensure smoothness. Their medical mission services have provided the following screening tests: ophthalmology (with the provision of glasses if needed), blood sugar, blood pressure, ECG, gynaecological cancer screening, as well as orthopaedics and dentistry.

Furthermore, in Caritas Hungary's experience some healthcare institutions do not have up-to-date information on how the extension of TP documents takes place, namely that the actual physical card certifying TP status will not be extended, but its validity is extended by law. As a result, the institutions concerned do not accept the statutory extension, citing that they have not received official information about this, are not familiar with the relevant provisions, or do not have written confirmation.

In practice, this results in the affected beneficiaries being denied care or requested to provide it for a fee. According to the organisation the primary cause of the problem is the lack of uniform, clear and up-to-date official information directed to health care institutions concerned, which would be essential to ensure the effective and continuous access to healthcare.³²²

Menedék Association put together a policy-specific recommendation based on their experience concerning the health-care provision of people fleeing Ukraine.³²³

In 2025, Menedék Association reported on a frequent issue where the health care providers asked for a document proving that the Ukrainian citizen patient does not have insurance in Ukraine.³²⁴

Lastly, in HHC' experience access to health care continues to be a challenge for beneficiaries of temporary protection. Despite the fact that Russia's full-scale invasion of Ukraine marked its sad 4th anniversary on 24 February 2026, UNHCR's 2025 SEIS survey also confirms that the lack of awareness about the fact that TP status grants health insurance continues to be an obstacle for receiving health care services.³²⁵

³²² Information received from the Caritas Hungary by the HHC on 14 January 2026.

³²³ Menedék Association: Recommendations in the area of health care provision of people fleeing Ukraine, available in Hungarian [here](#).

³²⁴ Information received from the Menedék Association by the HHC on 1 February 2026.

³²⁵ UNHCR, *Hungary: Socio-Economic Insights Survey, Final Report, 25 February 2026*, available [here](#).