

# Temporary Protection Poland

Update on 2025

This annex on temporary protection complements and should be read together with the [AIDA Country Report on Poland](#). It was written by Maja Łysienia, with the support of the Association for Legal Intervention and Helsinki Foundation for Human Rights, and was edited by ECRE.

# Table of Contents

<b>Temporary Protection Procedure</b> .....	<b>3</b>
<b>A. General</b> .....	<b>3</b>
<b>B. Qualification for temporary protection</b> .....	<b>4</b>
<b>C. Access to temporary protection and registration</b> .....	<b>10</b>
1. Admission to territory .....	10
2. Freedom of movement.....	13
3. Registration under temporary protection .....	13
4. Legal assistance .....	17
5. Information provision and access to NGOs .....	18
<b>D. Guarantees for vulnerable groups</b> .....	<b>19</b>
<b>Content of Temporary Protection</b> .....	<b>29</b>
<b>A. Status and residence</b> .....	<b>29</b>
1. Residence permit.....	29
2. Access to asylum and other legal statuses.....	32
<b>B. Family reunification</b> .....	<b>36</b>
<b>C. Movement and mobility</b> .....	<b>37</b>
<b>D. Housing</b> .....	<b>42</b>
<b>E. Employment and education</b> .....	<b>47</b>
1. Access to the labour market .....	47
2. Access to education.....	53
<b>F. Social welfare</b> .....	<b>60</b>
<b>G. Health care</b> .....	<b>67</b>

## Temporary Protection Procedure

### A. General

Title (EN)	Original Title (PL)	Web Link
Law of 12 March 2022 on assistance to Ukrainian nationals with regard to the arm conflict on the territory of this country (Special Law)	Ustawa z 12 marca 2022 r. o pomocy obywatelom Ukrainy w związku z konfliktem zbrojnym na terytorium tego państwa	<a href="https://bit.ly/4afrzMZ">https://bit.ly/4afrzMZ</a>
Law of 13 June 2003 on granting protection to foreigners within the territory of the Republic of Poland (Act on Protection)	Ustawa z dnia 13 czerwca 2003 r. o udzielaniu cudzoziemcom ochrony na terytorium Rzeczypospolitej Polskiej	<a href="https://bit.ly/4bvQiOa">https://bit.ly/4bvQiOa</a>
Law of 12 December 2013 on foreigners	Ustawa z dnia 12 grudnia 2013 r. o cudzoziemcach	<a href="https://bit.ly/4bwqMbl">https://bit.ly/4bwqMbl</a>

The Temporary Protection Directive (TPD) was implemented into the Polish legal system in 2003,<sup>1</sup> in the Act of 21 July 2003 on the Protection of Foreigners in Poland (hereinafter: Act on Protection). When the Council Implementing Decision (EU) 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 (hereinafter: Council Implementing Decision) has been adopted, for a short period of time, the temporary protection regime arising from the Act on Protection was applied to persons mentioned in Article 2 of the Council Implementing Decision.<sup>2</sup>

In March 2022, however, Polish authorities decided to adopt a new law:<sup>3</sup> the Act of 12 March 2022 on the Assistance to Ukrainian Nationals in relation to the Armed Conflict in this State (hereinafter: the Special Law). This law has been applied retroactively since 24 February 2022. Together with the Act on Protection, the new law implemented TPD in Poland until March 2026.

Accordingly, from March 2022 to March 2026, there were two temporary protection mechanisms in Poland:<sup>4</sup> a general one, arising from the Act on Protection, and a special one, based on the Special Law. Both applied to persons fleeing the war in Ukraine who were eligible for temporary protection under the Council Implementing Decision and TPD, albeit they were applicable to different groups of beneficiaries (see [Qualification for temporary protection](#)). They also offered different rights to their beneficiaries.

Since the very beginning of the war, millions of displaced persons have crossed the Polish-Ukrainian border. In 2025, 8,965,021 third-country nationals entered Poland via this border.<sup>5</sup> Only some of them registered as temporary protection beneficiaries in Poland. Between February 2022 and the end of December 2025, in total, 2,039,389 persons were granted special temporary protection in Poland.<sup>6</sup> At the end of 2025, there was 967,890 special temporary protection beneficiaries in Poland, including 965,660 Ukrainian nationals,<sup>7</sup> and 1,428 general temporary protection beneficiaries.<sup>8</sup> According to the Office for Foreigners, as of 31 December 2025, 969,248 beneficiaries enjoyed temporary protection in Poland (both

<sup>1</sup> Rada Ministrów, 'Projekt ustawy o udzielaniu cudzoziemcom ochrony na terytorium Rzeczypospolitej Polskiej. Druk nr 1304', 2003, available in Polish [here](#).

<sup>2</sup> For more, see previous AIDA reports, available [here](#).

<sup>3</sup> Which was unnecessary, see P. Sadowski, 'Czy zakres podmiotowy prawa polskiego jest zgodny z decyzją wykonawczą Rady (UE) 2022/382 w sprawie masowego napływu wysiedleńców z Ukrainy?', *Studia Iuridica* 2022, vol. 94, April 2023, available in Polish [here](#).

<sup>4</sup> See Article 2(6-8) of the Special Law, in force until 4 March 2026, clarifying that the Ukrainian nationals and their spouses covered by this act are considered to be enjoying temporary protection within the meaning of Article 106 of the Act on Protection, but their rights and obligations are specified in the Special Law, hence the Act on Protection is not applicable.

<sup>5</sup> Border Guard's official statistics for 2025, published [here](#).

<sup>6</sup> Information provided by the Ministry of Digital Affairs, 2 March 2026.

<sup>7</sup> Information provided by the Ministry of Digital Affairs, 2 March 2026.

<sup>8</sup> Information provided by the Office for Foreigners, 10 April 2026.

special and general). In 2025, 152,728 persons (mostly Ukrainian nationals – 152,513) were granted temporary protection (special or general).<sup>9</sup>

In March 2026, the two temporary protection mechanisms were merged (hereinafter: merged temporary protection).<sup>10</sup> The stay of all temporary protection beneficiaries in Poland is now regulated by the Act on Protection that was significantly changed by the Phasing-Out Law adopted in January 2026.<sup>11</sup> Under the new rules, temporary protection is valid for all temporary protection beneficiaries until 4 March 2027.<sup>12</sup>

This annex scrutinises temporary protection law and practice in Poland until April 2026 by differentiating between rules applicable until 5 March 2026 (and by distinguishing special and general temporary protection in this period) and after that date (with regard to merged temporary protection). Statistical data concern the years 2022-2025, supplemented by data for 2026 where available.

## B. Qualification for temporary protection

Only persons specifically mentioned in Article 2 of the Council Implementing Decision have been eligible for temporary protection in Poland.

### Special temporary protection (until March 2026)

Special temporary protection, arising from the Special Law, was available only to Ukrainian nationals, who reached Poland on or after 24 February 2022 due to the war in Ukraine, and some of their non-Ukrainian family members, i.e.:

- ❖ their spouses,
- ❖ the closest family of the Ukrainian national who had a 'Poles Card' (*Karta Polaka* - a document confirming that a person concerned belongs to the Polish nation), and
- ❖ from 1 July 2024: children of Ukrainian nationals and of their spouses.<sup>13</sup>

With regard to family members, the following rules applied:

- ❖ Spouses and children of Ukrainian nationals were not eligible for special temporary protection if they had Polish or some other EU Member State citizenship.
- ❖ 'Unmarried partners in a stable relationship' (Article 2(4)(a) of the Council Implementing Decision) were not eligible for special temporary protection.
- ❖ The 'closest family' of the Ukrainian national who had a 'Poles Card' had not been defined in law, so it has been unclear which family members have been considered to constitute this family.
- ❖ Until 1 July 2024, minor unmarried children of Ukrainian nationals (or their spouse) (Article 2(4)(b) of the Council Implementing Decision) were not eligible for special temporary protection unless they were the closest family of the Ukrainian national who has a 'Poles Card' or they were born in Poland of a mother who is a temporary protection beneficiary. However, in May 2024, the law was changed and starting from 1 July 2024 minor children of Ukrainian nationals and their spouses have been included into the special temporary protection regime. In 2025, 40 accompanied non-Ukrainian children were granted special temporary protection.<sup>14</sup>
- ❖ Children born in Poland to mothers under temporary protection were entitled to legal stay as long as their mother maintained this status. In May 2024, this law was changed in order to exclude from special temporary protection those children born in Poland who hold Polish or EU citizenship. In 2025, special temporary protection was granted to 4,858 newborns.<sup>15</sup>

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<sup>9</sup> Ibid.

<sup>10</sup> *Ustawa z dnia 23 stycznia 2026 r. o wygaszeniu rozwiązań wynikających z ustawy o pomocy obywatelom Ukrainy w związku z konfliktem zbrojnym na terytorium tego państwa oraz o zmianie niektórych innych ustaw.*

<sup>11</sup> Ibid.

<sup>12</sup> Article 106(1) of the Act on Protection, in force since 5 March 2026.

<sup>13</sup> Article 1(2) of the Special Law as amended on 15 May 2024, repealed as of 5 March 2026.

<sup>14</sup> Information provided by the Ministry of Digital Affairs, 2 March 2026.

<sup>15</sup> Information provided by the Ministry of Digital Affairs, 2 March 2026.

- ❖ 'Other close relatives who lived together as part of the family unit at the time of the circumstances surrounding the mass influx of displaced persons, and who were wholly or mainly dependent on' a Ukrainian national (Article 2(4)(c) of the Council Implementing Decision) might have been eligible for special temporary protection only if they were considered the 'closest family' of the Ukrainian national who had a 'Poles Card'.

The exclusion of some children (until July 2024) and other close relatives of Ukrainian nationals (until March 2026) from the personal scope of special temporary protection was considered incoherent with Article 2(4)(b-c) of the Council Implementing Decision.<sup>16</sup> However, these family members could still have been recognised as temporary protection beneficiaries under the Act on Protection.<sup>17</sup>

Contrary to the EU law,<sup>18</sup> Ukrainian national or their spouse needed to have entered Poland in a regular manner to qualify for special temporary protection (and intertwined set of rights). In practice, this rule has been understood broadly. For example, HNLAC reported that some persons were denied special temporary protection on this basis because they had left Ukraine illegally, via Russia.<sup>19</sup>

Moreover, some Ukrainian nationals were excluded from enjoying special temporary protection in Poland, i.e.:<sup>20</sup>

- ❖ holders of a temporary residence permit, permanent residence permit, EU long-term residence permit;<sup>21</sup>
- ❖ international protection beneficiaries;
- ❖ holders of a tolerated stay and humanitarian stay;
- ❖ asylum seekers (albeit a Ukrainian national who seeks asylum in Poland can withdraw their asylum application and again be eligible for temporary protection);<sup>22</sup>
- ❖ since 28 January 2023, temporary protection beneficiaries in other EU member states.<sup>23</sup>

In January 2024, the Ministry of Internal Affairs and Administration sent an instruction to respective authorities explaining that being a temporary protection beneficiary in another EU member state is actually not a sufficient reason to deny 'PESEL UKR' and a person concerned does not have to prove that they no longer enjoy temporary protection in another country to be granted this number. According to the Ministry, upon receiving a 'PESEL UKR' number, all the entitlements connected with the temporary protection in another country were ceased.<sup>24</sup> However, in September 2025 the wording of the respective provision was changed (from "enjoying" to "being granted temporary protection" in other member state) indicating a turn towards a more restrictive policy, i.e. to excluding from special temporary protection also persons who had received temporary protection in other member state even if they renounced it. The change, according to the government, was based on the CJEU's judgment in case C-753/23.

<sup>16</sup> M. Łysienia, 'Following the EU Response to the Russian Invasion of Ukraine? The Implementation of the Temporary Protection Directive in Poland', CEEMR vol. 12 no. 1, 2023, available [here](#).

<sup>17</sup> SIP, Letter of 30 November 2022 to the European Commission, available in English [here](#), 2; W. Klaus and M. Górczyńska, 'Administration and Law', in: M. Bukowski and M. Duszczyk (eds), *Hospitable Poland 2022+*, WiseEuropa 2022, available [here](#), 90; SIP, 'Komentarz do projektu ustawy o zmianie Ustawy o pomocy obywatelom Ukrainy...', July 2025, available in Polish [here](#). For more, see previous AIDA reports, available [here](#).

<sup>18</sup> SIP, Letter of 30 November 2022 to the European Commission, available in English [here](#), 2; M. Łysienia, 'Following the EU Response to the Russian Invasion of Ukraine? The Implementation of the Temporary Protection Directive in Poland', CEEMR vol. 12 no. 1, 2023, available [here](#), 188.

<sup>19</sup> K. Przybysławska, 'Stateless persons from Ukraine seeking protection in Poland', HNLAC, 16 October 2023, available in English [here](#), 8.

<sup>20</sup> Article 2(3) of the Special Law, repealed as of 5 March 2026.

<sup>21</sup> Since 28 January 2023, the Special Law specifies that applying for these permits does not result in the loss of temporary protection (Article 2(5a) repealed as of 5 March 2026).

<sup>22</sup> Article 2(5) of the Special Law, repealed as of 5 March 2026.

<sup>23</sup> Article 2(3)<sub>(3)</sub> and Article 11(4) of the Special Law, both in force from 28 January 2023 to 4 March 2026.

<sup>24</sup> Mapuj Pomoc, Odpowiedź MSWiA na apel ws. statusu UKR, 2 February 2024, available in Polish [here](#); Human Rights Commissioner, 'Problemy ze statusem UKR uchodźców wojennych z Ukrainy. Odpowiedź MSWiA', 4 July and 26 August 2024, available in Polish [here](#)

- ❖ and, since 30 September 2025, Ukrainian nationals who crossed a border based on the local border traffic permit.<sup>25</sup>

The amendment was introduced in order to prevent abuses of temporary protection by persons who do not need this protection but use their local border traffic permits to apply for it and receive intertwined social welfare benefits despite not staying permanently in Poland. NGOs argued that the amendment unfairly treats Ukrainian nationals and incorrectly excludes persons who truly seek protection from the ongoing war in Ukraine but happen to be local border traffic permit holders.<sup>26</sup>

### **General temporary protection (until March 2026)**

General temporary protection mechanism applied to persons mentioned in Article 2 of the Council Implementing Decision, who are not eligible for special temporary protection,<sup>27</sup> i.e.:

- ❖ stateless persons, and nationals of third countries other than Ukraine, who benefited from international protection or equivalent national protection in Ukraine before 24 February 2022; with their family members, and
- ❖ stateless persons, and nationals of third countries other than Ukraine, who can prove that they were legally residing in Ukraine before 24 February 2022 on the basis of a valid permanent residence permit issued under Ukrainian law, and who are unable to return in safe and durable conditions to their country or region of origin.

Under Article 109 of the Act on Protection, the beneficiary could have been excluded from general temporary protection for security-related reasons (as in Article 28 TPD). Similar rules were not established as regards special temporary protection beneficiaries.

#### *Stateless persons*

In 2022-2025, in total, 128 stateless persons and persons with undetermined nationality benefited from temporary protection in Poland (special or general), with 86 still enjoying it at the end of 2025.<sup>28</sup>

In September 2023, the Human Rights Commissioner indicated that stateless persons from Ukraine faced several problems with accessing temporary protection in Poland. Due to the lack of documents, they might have difficulty in proving that they had legally resided in Ukraine. Moreover, the recognition of statelessness procedure had been established in Ukraine not long before the outbreak of the war and many stateless persons did not manage to benefit from this new solution. Lastly, there is no uniform understanding of the term 'stateless person', according to the Commissioner.<sup>29</sup>

In October 2023, HNLAC published a report "Stateless persons from Ukraine seeking protection in Poland".<sup>30</sup> The NGO listed groups of persons who cannot access or face difficulties in accessing temporary protection in Poland, i.e. Roma people, former citizens of the USSR, persons displaced after the 2014 Russian invasion and persons from the occupied territories, Russian nationals living permanently in Ukraine, children (especially separated), refugees, asylum seekers, migrants and undocumented persons. The report identified many protection gaps in Poland within this context. Specifically, it pointed

<sup>25</sup> Article 2(3)<sup>(4)</sup> of the Special Law, in force from 30 September 2025 to 4 March 2026.

<sup>26</sup> SIP, 'Komentarz do projektu ustawy o zmianie Ustawy o pomocy obywatelom Ukrainy...', July 2025, available in Polish [here](#).

<sup>27</sup> Office for Foreigners, 'Ochrona czasowa dla cudzoziemców niebędących obywatelami Ukrainy', 23 March 2023, available in Polish [here](#).

<sup>28</sup> Information provided by the Office for Foreigners, 10 April 2026.

<sup>29</sup> Human Rights Commissioner, 'Problemy bezpieczeństwa - uchodźców z Ukrainy. Odpowiedź Szefa Urzędu ds. Cudzoziemców', 7 and 27 September 2023, available in Polish [here](#). See also HNLAC, 'Refugees from Ukraine: stateless persons and persons at risk of being stateless. Most important challenges', 21 November 2022, available [here](#). K. Przybyłowska, 'Stateless persons from Ukraine seeking protection in Poland', HNLAC, 16 October 2023, available in English [here](#), 13-14.

<sup>30</sup> K. Przybyłowska, 'Stateless persons from Ukraine seeking protection in Poland', HNLAC, 16 October 2023, available in English [here](#).

out that the Border Guard applies a too narrow understanding of “statelessness” (i.e. focusing only on persons holding a travel document issued on the basis of the 1954 Convention Relating to the Status of Stateless Persons). Moreover, HNLAC echoed the concerns raised by the Human Rights Commissioner regarding difficulties in accessing temporary protection, as mentioned in the aforementioned letter. It added that there is no statelessness determination procedure in Poland, so unrecognised stateless persons coming from Ukraine may be unable to prove their statelessness and, consequently, benefit from temporary protection in Poland.

In 2024-2026, the abovementioned problems remained unaddressed.

### **Merged temporary protection (since March 2026)**

#### *New rules*

Special and general temporary beneficiaries’ stay in Poland is now regulated only by the Act on Protection (as changed in January 2026 by the Phasing-Out Law).

Temporary protection beneficiaries are now understood as:

- ❖ persons mentioned in the Council Implementing Decision;
- ❖ children of temporary protection beneficiaries who were born in Poland as long as they are not Polish or EU citizens, and
- ❖ persons mentioned in the Council of Minister’s ordinance extending the scope of temporary protection beyond the Council’s decision (as of April 2026, no such ordinance has been adopted).<sup>31</sup>

Accordingly, persons mentioned in the Council Implementing Decision who struggled with access to special temporary protection until March 2026 (in particular, ‘other close relatives who lived together as part of the family unit at the time of the circumstances surrounding the mass influx of displaced persons, and who were wholly or mainly dependent on’, see above), may now receive temporary protection (so also ‘PESEL UKR’). However, their access to temporary protection may be still hampered by the 30-day deadline for seeking protection since entering Poland introduced in March 2026.

The requirement of legal entry into Poland – before provided for in Article 2 of the Special Law – is still applicable but now under Article 106(1) of the Act on Protection.

Some persons mentioned in the Council Implementing Decision are still excluded from enjoying temporary protection in Poland, i.e.:<sup>32</sup>

- ❖ holders of a temporary residence permit, permanent residence permit, EU long-term residence permit;
- ❖ international protection beneficiaries;
- ❖ holders of a tolerated stay and humanitarian stay;
- ❖ asylum seekers (albeit – upon a negative asylum decision – a person concerned again enjoys temporary protection<sup>33</sup>);
- ❖ persons who were granted temporary protection in other EU member states;
- ❖ holders of EU citizenship;
- ❖ Ukrainian nationals who crossed a border based on the local border traffic permit.

Moreover, under the new rules, all beneficiaries can be excluded from protection based on security-related reasons (relying on Article 28 TPD). The respective decision of the Chief of the Office for Foreigners is made in two days and is final.<sup>34</sup>

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<sup>31</sup> Article 2(1a) of the Act of Protection, in force since 5 March 2026.

<sup>32</sup> Article 109a of the Act of Protection, in force since 5 March 2026.

<sup>33</sup> Article 109b(3) of the Act of Protection, in force since 5 March 2026.

<sup>34</sup> Article 109 of the Act of Protection, in force since 5 March 2026.

### *Transitional provisions*

Beneficiaries who were granted special temporary protection before 5 March 2026 automatically became temporary protection beneficiaries under the Act on Protection as of that date.<sup>35</sup>

General temporary protection beneficiaries can apply for 'PESEL UKR' or remain in Poland based on the certificate confirming that they enjoy temporary protection in Poland (see [Residence permit](#)).<sup>36</sup>

### **Persons not enjoying temporary protection**

#### *Special solutions for Ukrainian nationals*

Poland did not extend the personal scope of temporary protection to displaced persons from Ukraine other than the ones specifically mentioned in Article 2 of the Council Implementing Decision. In particular, persons who came to Poland before 24 February 2022 are not covered by any of the temporary protection mechanisms.<sup>37</sup> However, some special rules as regards their stay in Poland were introduced in the Special Law and upheld despite the merge of the temporary protection systems in 2026:<sup>38</sup>

- ❖ Validity of national visas issued to Ukrainian nationals was prolonged by law to 4 March 2027, if they were to expire after 24 February 2022. Such a prolonged visa did not entitle to cross a border unless the person concerned was a professional driver in international transportation.
- ❖ Validity of temporary residence permits issued to Ukrainian nationals was prolonged by law to 4 March 2027, if they were to expire after 24 February 2022.
- ❖ The validity of residence permits (*karty pobytu*), Polish identity documents and tolerated stay documents of Ukrainian nationals was prolonged by law until 4 March 2027 if they were to expire after 24 February 2022. Such a prolonged residence permit does not entitle to cross a border.
- ❖ If a Ukrainian national came to Poland before 24 February 2022 on a basis of a Schengen visa, visa-free movement or other documents that entitle to travel in the EU, and the last day of their legal stay in Poland on this basis were to pass after 24 February 2022, their legal stay in Poland was prolonged by law until 4 March 2027.

Most of these prolonged visas and residence permits do not entitle to crossing the border. It limits the Ukrainian nationals' mobility and may lead to some practical difficulties.<sup>39</sup>

Until 5 March 2026, also other special rules were in force as regards Ukrainian nationals:

- ❖ A 15-day permit to enter Poland given by the Border Guard at the Polish border to a Ukrainian national was prolonged by law by 18 months.
- ❖ The 30-day period for leaving Poland applicable to Ukrainian nationals was prolonged by law until 4 March 2026, if it was to pass after 24 February 2022.
- ❖ The period for a voluntary return determined in a decision concerning a Ukrainian national was prolonged by law until 4 March 2026, if it was to pass after 24 February 2022.

#### *Other third-country nationals fleeing Ukraine*

While some Ukrainian nationals, not eligible for temporary protection, could benefit from the above-mentioned solutions, third-country nationals who lived in Ukraine before 24 February 2022 and who were

<sup>35</sup> Article 24(1)(2) of the Phasing-Out Law.

<sup>36</sup> Article 20 (1) and (4) of the Phasing-Out Law.

<sup>37</sup> See, critically, W. Klaus and M. Górczyńska, 'Administration and Law', in: M. Bukowski and M. Duszczyk (eds), *Hospitable Poland 2022+*, WiseEuropa 2022, available [here](#), 90.

<sup>38</sup> Articles 42 and 44 of the Special Law. The latter repealed as of 5 March 2026.

<sup>39</sup> See e.g. Human Rights Commissioner, 'Obywatelka Ukrainy niewpuszczona do Polski. Skuteczna interwencja RPO', 18 January 2023, available in Polish [here](#).

not mentioned in Article 2 of the Council Implementing Decision (e.g. students, temporary workers, undocumented migrants, asylum seekers) were not eligible for any form of special support in Poland.

Some third-country nationals were detained upon crossing the Polish border.<sup>40</sup> The exact number of non-Ukrainian third-country nationals fleeing Ukraine who were detained remains unknown, as most of the detention centres declared that they do not gather such data or that they did not detain such persons. However, partial data has been made available, including information from the detention centre in Lesznowola, which confirmed the detention of 26 third-country nationals who fled Ukraine in 2022. The average duration of detention for these individuals was 95 days. In 2023, HNLAC reported that 49 persons with undetermined nationality fleeing Ukraine were detained upon entry to Poland in the period of February 2022-June 2023.<sup>41</sup>

Those third-country nationals who were not detained, were admitted to Poland for a 15-day stay and were left without any state support during that time.<sup>42</sup> In practice, accommodation and other assistance for this group of displaced persons was provided by NGOs. Prolonging their legal stay upon 15 days was very difficult, if not impossible. Some third-country nationals, who overstayed in Poland, were subsequently detained.<sup>43</sup>

Some non-Ukrainian third-country nationals who fled from Ukraine sought asylum in Poland, but their number is unknown.

#### *Return and detention of Ukrainian nationals*

In 2022-2025, some Ukrainian nationals were returned/readmitted from Poland to Ukraine.

Number of Ukrainian nationals					
	Return decisions (based on national security)	Appeals from return decisions	Forced returns	Voluntary returns	Readmissions
2022	994 (137)	207	Lack of data	Lack of data	Lack of data
2023	460 (387)	79	311	138	355
2024	544 (474)	207	387	61	491
2025	1,618 (1,468)	315 (265)	1,166	77	87

Based on the data provided by the Border Guard Headquarters, 9 February 2023, 18 and 27 March 2024, 7 March 2025, 25 February 2026 and 6 March 2026.<sup>44</sup>

The Border Guard declared that returns to Ukraine were suspended from 25 February 2022 to 27 January 2023.<sup>45</sup> From 28 January 2023 to 4 March 2026, the Special Law specified that return proceedings may not be initiated against Ukrainian nationals and the initiated proceedings may be discontinued if it is in the interest of a concerned person. This rule was not applicable to return decisions issued for national security and similar reasons (Article 42b). Thus, while the Border Guard could refrain from deporting Ukrainian nationals, the abovementioned statistical data show that the returns to Ukraine were not fully suspended:

<sup>40</sup> See e.g. Human Rights Commissioner, 'Przedstawiciele BRPO w placówkach SG w województwach podkarpackim i lubelskim', 5 March 2022, available in Polish [here](#): SIP, Lambda Warsaw, Birmingham City University and Global Detention Project, Third-party submission in the 4<sup>th</sup> cycle of Universal Periodic Review of Poland, available in English [here](#), 13.

<sup>41</sup> K. Przybysławska, 'Stateless persons from Ukraine seeking protection in Poland', HNLAC, 16 October 2023, available in English [here](#), 14.

<sup>42</sup> A. Minkiewicz, P. Mirabelli, A. Nosowska and L. Pelham, 'Equality versus equity: a case study from Poland', FMR no. 72, September 2023, available [here](#), 21.

<sup>43</sup> SIP, 'SIP w działaniu. Raport z działalności Stowarzyszenia Interwencji Prawnej w 2022 r.', September 2023, available in Polish [here](#), 14.

<sup>44</sup> See also Border Guard's official statistics for 2025, published [here](#). However, the Office for Foreigners stated that return decisions concerned 1,655 Ukrainian nationals in 2025 (see data for 2025 published by the Office for Foreigners, [here](#): [link](#)).

<sup>45</sup> Information from the Border Guard's Headquarters, 25 January 2023.

return decisions concerning Ukrainian nationals were in practice issued and executed in 2023-2025 - mostly based on national security considerations.<sup>46</sup> For example, in 2025, the Border Guard reported two Ukrainian men being deported to Ukraine due to, respectively, violent behaviour and thefts, with 10 and 7-year entry bans in force.<sup>47</sup> In March 2026, Article 42b was repealed, so under the Polish law there is currently no limitation in force in initiating return proceedings and executing returns as regards Ukrainian nationals.

At the end of 2022, the Supreme Administrative Court stated that war in Ukraine has no impact on the return proceedings initiated before its outbreak. The Court highlighted though that considering these new circumstances, the Border Guard can initiate separate proceedings concerning a humanitarian stay in Poland.<sup>48</sup> However, in 2023, only 9 Ukrainian nationals, in 2024, 3 Ukrainian nationals, and in 2025 - 1 Ukrainian national were granted a humanitarian stay in Poland.<sup>49</sup>

Some Ukrainian nationals were also detained in Poland in 2022-2025 (21 Ukrainian nationals in 2022, 39 in 2023, and 63 in 2024). In 2025, 337 Ukrainian nationals were detained.<sup>50</sup> Ukrainian nationals are detained not only pending removal but also during asylum proceedings.

Detention of Ukrainian nationals in 2025		
Detention centre	Number of detained Ukrainian nationals in 2025	Period on detention
Przemyśl	54	From 3 to 180 days
Krosno Odrzańskie	Not operating in 2025	Not operating in 2025
Kętrzyn	60	Unknown
Białystok	60	76 days (average)
Lesznowola	98	52 days (average)
Biała Podlaska	20	From 21 to 193 days

Source: Information from different branches of BG from January, February and April 2026.

## C. Access to temporary protection and registration

### 1. Admission to territory

#### *Allowing entry*

At the beginning of the war in Ukraine, Poland swiftly opened its borders to displaced persons. Polish authorities widely informed that every person from Ukraine will be allowed to enter Poland and that they do not need to worry about documents normally required to cross a Polish border or to stay in Poland.<sup>51</sup>

<sup>46</sup> See also Office for Foreigners, 'Postępowania ws. ochrony międzynarodowej dotyczące obywateli Ukrainy', 10 March 2025, available in Polish [here](#).

<sup>47</sup> Border Guard, 'Za popełnione przestępstwa wrócili na Ukrainę', 20 October 2025, available in Polish [here](#).

<sup>48</sup> Naczelny Sąd Administracyjny (Supreme Administrative Court), judgment of 15 December 2022, no. II OSK 993/22.

<sup>49</sup> Information from the Office for Foreigners, 16 February 2024 and 19 February 2025; data for 2025 published by the Office for Foreigners, [here](#).

<sup>50</sup> Based on the information provided by the branches of the Border Guard. However, the Border Guard Headquarters informed that 59 Ukrainian nationals were detained in 2024 (information of 7 March 2025) and 337 in total in 2025 with 314 placed in detention that year (information from 6 March 2026).

<sup>51</sup> See e.g. Ministry of Internal Affairs and Administration, 'Minister Kamiński: Wszystkim naszym ukraińskim braciom okażemy solidarność i wsparcie', 24 February 2022, available in Polish [here](#). Office for Foreigners, 'Informacja w sprawie pobytu w Polsce osób uciekających z Ukrainy', 27 February 2022, available in Polish [here](#). See also Jaroszewicz M., Krępa M., 'Stabilisation of Emergency Measures: Poland's Refugee Reception System One Month After the Russian Attack on Ukraine', in M. Ineli-Ciger, S. Carrera (eds), *EU Responses*

Ukrainian nationals and other persons fleeing from Ukraine were admitted to Poland sometimes even without any formal check of their identity or registration of their arrival.<sup>52</sup>

At the beginning of the war, cases of discrimination and racial profiling were reported at the border.<sup>53</sup> Some non-Ukrainian nationals, in particular foreign students, were not allowed by Ukrainian authorities to enter Poland; racist incidents were reported as well.<sup>54</sup> Moreover, non-Ukrainians were singled out by the Polish Border Guard from the groups of people crossing the border and subjected to a more detailed identity control lasting from a couple of hours to several days. Seeking asylum was possible, but some of those ‘singled-out’ third-country nationals were detained upon failed identity verification.<sup>55</sup>

Already in the first month of the outbreak of the war, over 104,000 non-Ukrainians crossed the Polish-Ukrainian border.<sup>56</sup> Persons who were not entitled to cross the Polish border (e.g. they were not entitled to the visa-free movement in the EU), were issued by the Border Guard with a special permit for up to 15-day-long stay in Poland.<sup>57</sup> Those permits, however, were prolonged by law by 18 months specifically for Ukrainian nationals and some of their family members.<sup>58</sup> Other third-country nationals most often had to leave Poland before the expiration of the validity of this short-term permit. However, organising travel in such a short time (e.g. obtaining a visa to another state, as the 15-day permit allowed only to enter and stay in Poland) proved difficult in practice.<sup>59</sup> The number of these special permits issued at the Polish-Ukrainian border has decreased significantly since 2022.

Special permits for up to 15-day-long stay in Poland		
	Issued at the Ukrainian border	Including for Ukrainian nationals
2022	1,321,240	1,239,814 (94%)
2023	179,664	179,361 (99.8%)
2024	73,085	Lack of data
2025	2,393	Lack of data

*to the Large-Scale Refugee Displacement from Ukraine: An Analysis on the Temporary Protection Directive and Its Implications for the Future EU Asylum Policy*, EUI 2023, available [here](#), 166.

<sup>52</sup> For this reason, the Special Law, in Article 3, provided for the possibility of the post-factum registration of entry to Poland. For more, see [Registration under temporary protection](#). See also, as regards children travelling without parents to join their family members in Poland and beyond, who entered Poland without required documents and any registration, HFHR, ‘Dzieci z pieczy zastępczej oraz małoletni bez opieki z Ukrainy: ocena ex-post regulacji i praktyki stosowania specustawy ukraińskiej’, October 2022, available in Polish [here](#), 12.

<sup>53</sup> Jaroszewicz M., Krępa M., ‘Stabilisation of Emergency Measures: Poland’s Refugee Reception System One Month After the Russian Attack on Ukraine’, in M. Ineli-Ciger, S. Carrera (eds), *EU Responses to the Large-Scale Refugee Displacement from Ukraine: An Analysis on the Temporary Protection Directive and Its Implications for the Future EU Asylum Policy*, EUI 2023, available [here](#), 167-168. See also Fundacja w Stronę Dialogu, *To nie są uchodźcy, tylko podróżnicy. Sytuacja romskich osób uchodźczych w województwie podkarpackim. Raport monitoringowy 2022-2023*, July 2023, available in Polish [here](#), 18-20.

<sup>54</sup> Human Rights Commissioner, ‘Granica UA-RP: odmienne traktowanie studentów z innych państw. RPO interweniuje w MSWIA. Resort wyjaśnia’, 1 March 2022, available in Polish [here](#). See also ECRE, ‘Seeking Refuge in Poland: A Fact-Finding Report on Access to Asylum and Reception Conditions for Asylum Seekers’, April 2023, available [here](#), 20.

<sup>55</sup> Human Rights Commissioner, ‘Przedstawiciele BRPO w placówkach SG w województwach podkarpackim i lubelskim’, 5 March 2022, available in Polish [here](#), HNLAC, ‘Poland: Information for stateless people and those at risk of statelessness fleeing Ukraine’, ENS, 6 April 2022, available [here](#), 1, 4.

<sup>56</sup> Klaus W. (ed), *Ustawa o pomocy obywatelom Ukrainy w związku z konfliktem zbrojnym na terytorium tego państwa. Komentarz*, Wolters Kluwer 2022, 26.

<sup>57</sup> Human Rights Commissioner, ‘Kolejne wizyty przedstawicieli BRPO przy granicy polsko-ukraińskiej’, 12 March 2022, available in Polish [here](#). See Article 32 of the Act on Foreigners, based on Article 6(5)(c) of the Schengen Border Code.

<sup>58</sup> Article 44 of the Special Law, repealed since March 2026.

<sup>59</sup> W. Klaus and M. Górczyńska, ‘Administration and Law’, in: M. Bukowski and M. Duszczyk (eds), *Hospitable Poland 2022+*, WiseEuropa 2022, available [here](#), 90. See also Jaroszewicz M., Krępa M., ‘Stabilisation of Emergency Measures: Poland’s Refugee Reception System One Month After the Russian Attack on Ukraine’, in M. Ineli-Ciger, S. Carrera (eds), *EU Responses to the Large-Scale Refugee Displacement from Ukraine: An Analysis on the Temporary Protection Directive and Its Implications for the Future EU Asylum Policy*, EUI 2023, available [here](#), 167.

Based on the data provided by the Border Guard Headquarters, 9 February 2023, 21 March 2024, 7 March 2025 and 6 March 2026.

Until March 2026, the Act on Protection provided for the possibility to issue a free-of-charge visa to a person enjoying temporary protection under the general mechanism.<sup>60</sup> In 2025, it was, however, neither requested nor granted.<sup>61</sup> No similar possibility has been guaranteed in the Special Law. However, the Act on Foreigners also mentions a visa issued in order to enjoy temporary protection.<sup>62</sup> In practice, it has hardly ever been requested. In 2025, it was neither requested nor granted.<sup>63</sup>

While a possibility to issue special visas for temporary protection holders is not used in practice, persons displaced from Ukraine can be granted a visa for humanitarian reasons. In 2022, a total of 352 Ukrainian nationals applied for a visa to Poland based on humanitarian reasons<sup>64</sup>, with 346 of them receiving approval. Additionally, 804 third-country nationals applied for a humanitarian visa in the Polish consulates located in Ukraine, and 798 were granted this visa. In 2023, the numbers decreased with 104 Ukrainian nationals applying for a humanitarian visa to Poland, of which 101 were approved.<sup>65</sup> In 2024, the Ministry of Foreign Affairs denied access to the information on how many Ukrainian nationals applied and received a humanitarian visa.<sup>66</sup> In 2025, no Ukrainian national applied for a humanitarian visa and one third-country national applied for it and received it in the Polish Consulate in Lviv.<sup>67</sup>

### *Denying entry*

While the admission of displaced persons to Poland at the very beginning of the war in Ukraine did not raise major concerns, soon the Polish Border Guard started to issue decisions on a refusal of entry at the Polish-Ukrainian border.<sup>68</sup> In the period between March and December 2022, the Border Guard issued in total 14,063 decisions on a refusal of entry at this border. This number includes decisions issued as regards 11,745 Ukrainian nationals. In the same period, 12,894 Ukrainian nationals were denied entry to Poland if one considers all Polish external borders. According to the Border Guard, those decisions on a refusal of entry were, first of all, reasoned by exceeding the 90-day period for visa-free movement in the EU, and, secondly, the lack of documents entitling to entry, e.g. a visa or a residence permit. Several persons were denied entry for national security reasons.<sup>69</sup> Refusals of entry at the Polish-Ukrainian border and concerning Ukrainian nationals continued in 2023-2025.

	Decisions on a refusal of entry issued at the PL-UKR border	Ukrainian nationals denied entry at all Polish border crossings
2022 (March-December)	14,063	12,894
2023	13,030	12,006
2024	15,816	14,279
2025	20,953	19,621

<sup>60</sup> Article 110(1-2) of the Act on Protection, repealed as of 5 March 2026.

<sup>61</sup> Information from the Ministry of Foreign Affairs, 16 January 2026.

<sup>62</sup> Article 60(1)<sub>(22)</sub> of the Act on Foreigners.

<sup>63</sup> Information from the Ministry of Foreign Affairs, 24 February 2025 and 16 January 2026.

<sup>64</sup> Based on Article 60(1)<sub>(23)</sub> of the Act on Foreigners.

<sup>65</sup> Information from the Ministry of Foreign Affairs, 31 January 2023 and 4 March 2024.

<sup>66</sup> Information from the Ministry of Foreign Affairs, 24 February 2025.

<sup>67</sup> Information from the Ministry of Foreign Affairs, 16 January 2026.

<sup>68</sup> See also HIAS and R2P, 'The told me they couldn't help me... Protection Risks Facing Non-Ukrainian Asylum Seekers and Refugees Fleeing Ukraine to the EU', January 2023, available [here](#), 5-6, referring to statements of a third-country national refused entry to Poland, and of a NGO by stating that 'since April 2022, the Ukraine-Poland border has operated the same as it did before February 2022: that is, there are no simplified procedures and there are strict border controls'. See also ACAPS, 'Poland: Loss of temporary protection status and social benefits for Ukrainian refugees', 14 November 2023, available [here](#), 5-6.

<sup>69</sup> Information from the Border Guard's Headquarters, 9 February 2023. These data differ from the data provided by the same authority to SIP in 2022 and earlier in 2023 (see e.g. SIP, 'Disturbing refusals of entry at the Ukrainian border', 6 March 2023, available [here](#); PRAB, 'Beaten, punished and pushed back', January 2023, available [here](#), 12).

Based on the data provided by the Border Guard Headquarters, 9 February 2023, 18 March 2024, 7 March 2025 and 25 February 2026.

In 2025, 95 persons appealed against this decision issued at the Ukrainian border and 84 Ukrainian nationals challenged this decision with respect to entry at all Polish border crossings.<sup>70</sup> An appeal against a decision on a refusal of entry is not an effective remedy – it lacks a suspensive effect – and is in general used rarely.

According to the NGOs, persons seeking protection in Poland due to the war in Ukraine, including recognised temporary protection beneficiaries, were amongst those who had been denied entry at the Polish-Ukrainian border.<sup>71</sup> Recognised temporary protection beneficiaries in Poland struggled with re-entry to Poland upon their temporary return to Ukraine. Those difficulties resulted from the unfavourable practice of the Border Guard and the incorrect implementation of the TPD in Poland<sup>72</sup> (see [Movement and mobility](#)).

Entering Poland has been also hampered for non-Ukrainians fleeing the war. In July 2023, SIP, HIAS, Right to Protection and Alliance for Black Justice appealed to Polish authorities to enable entry of all persons fleeing Ukraine and seeking protection in Poland. NGOs noticed that asylum seekers, refugees and complementary protection holders<sup>73</sup> faced particular difficulties with entering Poland (mostly related to the lack of travel documents, visas and residence permits). They also stated that Poland seems to not recognise travel documents issued by Ukraine to complementary protection beneficiaries.<sup>74</sup> Moreover, in October 2023, HNLAC published a report focusing on the stateless persons. It stated that in the period of February 2022-June 2023, according to the Border Guard, 4,415 stateless persons, persons with undetermined nationality and recognised refugees were allowed to enter Poland. However, 42 stateless persons and persons with undetermined nationality were denied entry in this period. 49 persons with undetermined nationality were detained upon entry to Poland.<sup>75</sup>

## 2. Freedom of movement

No problems concerning moving within Poland by temporary protection beneficiaries were reported.

The journey towards other European countries and Ukraine was hindered in 2022-2025 (see [Movement and Mobility](#)).

## 3. Registration under temporary protection

### Special temporary protection (until March 2026)

Ukrainian nationals and some members of their family, who were eligible for temporary protection under the Special Law, could register with any of the local authorities (*organ wykonawczy gminy*) to obtain a special personal identification number 'PESEL UKR'.<sup>76</sup> Obtaining this number was not mandatory, however, access to some rights was conditioned upon acquiring it. The first 'PESEL UKR' numbers were granted on 16 March 2022.<sup>77</sup> In 2022, approx. 1,502,620 persons were given 'PESEL UKR' in Poland. Until the end of December 2025, in total, 2,039,389 persons were granted special temporary protection

<sup>70</sup> Information from the Border Guard's Headquarters, 14 April 2026.

<sup>71</sup> PRAB, 'Surprisingly surprised', September 2023, available in English [here](#), 6.

<sup>72</sup> SIP, Letter of 30 November 2022 to the European Commission, available in English [here](#): 3-4.

<sup>73</sup> Ukrainian legislation defines a person in need of complementary protection as a person, who is not a refugee, but is in need of protection because of a threat to their life, safety or freedom in the country of origin, owing to a fear of death penalty, torture, inhuman or degrading treatment, punishment, or generalised violence in situations of international or internal armed conflicts, or systematic human rights abuses. UNHCR Ukraine, Forms of asylum and refugee protection, available [here](#).

<sup>74</sup> SIP, R2P, HIAS and ABJ, Letter of 5 July 2023, available in Polish and English [here](#).

<sup>75</sup> K. Przybysławska, 'Stateless persons from Ukraine seeking protection in Poland', HNLAC, 16 October 2023, available in English [here](#), 14.

<sup>76</sup> Article 4 of the Special Law, repealed as of 5 March 2026.

<sup>77</sup> Ministry of Internal Affairs and Administration, 'Ruszył proces nadawania numeru PESEL uchodźcom wojennym z Ukrainy', 16 March 2022, available in Polish [here](#).

in Poland.<sup>78</sup> At the end of 2025, there were 967,890 special temporary protection beneficiaries.<sup>79</sup> In 2025, 'PESEL UKR' was granted to 148,510 persons, including 148,320 Ukrainian nationals and 190 non-Ukrainian nationals.<sup>80</sup>

The application for the 'PESEL UKR' had to be submitted in person and in writing. Until 30 September 2025, due to the ill health or disability of an applicant, the application could be submitted in their place of stay.<sup>81</sup> For children, an application was submitted by their parents, caregivers, guardians, temporary guardians, or, if needed, *ex officio*. Applicants were fingerprinted, with some exceptions *inter alia* concerning children under 6 years old. Applications are also available in the Ukrainian language.

The application for the 'PESEL UKR' contained a declaration of the applicant that they had entered Poland due to the war in Ukraine. Family members also declared that they are either a spouse of a Ukrainian national, a child of a Ukrainian national or their spouse, a member of the 'closest family' of a Ukrainian national having a 'Pole's Card', or a child born in Poland to a mother eligible for special temporary protection. Since September 2025, applicants also had to declare that they have not obtained a residence permit in Poland, have not applied for asylum, were not granted temporary protection in other Member State and have not crossed the border based on the local border traffic permit. These declarations were made under the penalty of criminal responsibility.

Until 1 July 2024, in accordance with the Special Law, an identity of Ukrainian nationals and their family members was established on a basis of a passport, Pole's Card, or another document with a photo that enabled their identification. In the case of children, birth certificates were also accepted. Invalid documents could have been recognised if they enabled identification. In practice though, due to the lack of identity documents, some beneficiaries, in particular from the Roma minority and stateless persons, struggled with accessing temporary protection (see also [Qualification for temporary protection](#) and [Guarantees for vulnerable persons](#)).<sup>82</sup> In May 2024 the Special Law was amended and since 1 July 2024 only a valid travel document has been accepted to confirm a beneficiary's identity.<sup>83</sup> Persons whose identity had been confirmed in a different manner had to reconfirm it by showing a valid travel document within 60 days from the day of the travel document's issuance. In 2024, UNHCR recalled that "20% of respondents reported that at least one of their household members lacks valid biometric passports. In addition, 13% of respondents stated that they are unable to renew or replace their documentation in Poland due to the cost, lack of information and long waiting times associated with the procedure".<sup>84</sup> In 2025, CPPHN confirmed that some Ukrainian nationals staying in Poland have no access to Ukrainian travel documents.<sup>85</sup> The new, strict passport requirement has hampered access to protection for the first-time beneficiaries, especially men (in connection with a mandatory military service in Ukraine), and led to difficulties intertwined with the pendular movement (see [Movement and mobility](#)).

In 2022, there was no specific time-limit to apply for a 'PESEL UKR'. However, if a person concerned wanted to have their entry to Poland registered by the Border Guard,<sup>86</sup> an application for 'PESEL UKR'

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<sup>78</sup> Information provided by the Ministry of Digital Affairs, 2 March 2026.

<sup>79</sup> Ibid.

<sup>80</sup> Ibid.

<sup>81</sup> The change was criticized by the Human Rights Commissioner, see [here](#), and NGOs, see e.g. [here](#).

<sup>82</sup> Human Rights Commissioner, 'Systemowo chronić grupy wrażliwe wśród uchodźców z Ukrainy. Odpowiedź pełnomocnika rządu ds. uchodźców z Ukrainy', 8 April and 13 July 2022, available in Polish [here](#). See also K. Przybysławska, 'Stateless persons from Ukraine seeking protection in Poland', HNLAC, 16 October 2023, available in English [here](#), 5-6. IOM Poland, 'Experiences of Roma Refugees from Ukraine in Accessing Services and Assistance in Poland', August 2024, available [here](#).

<sup>83</sup> Confirming the identity based on other documents is only possible based on a special ordinance that can be adopted in the face of mass influx from Ukraine (Article 4a of the Special Law, in force from 1 July 2024 until 4 March 2026).

<sup>84</sup> UNHCR, 'Draft law amending the Act on Assistance to Citizens of Ukraine in the Context of the Armed Conflict in Ukraine ("the Special Act"). UNHCR Comments and Observations', April 2024, available [here](#), 2.

<sup>85</sup> CPPHN, 'Dokument podróży dla obywatela Ukrainy', 21 May 2025, available in Polish [here](#).

<sup>86</sup> It was particularly important for persons who entered Poland at the beginning of the war. Back then, not all arrivals were registered at the border. Thus, in Article 3, the Special Law offered a possibility to have the arrival to Poland registered post-factum. In 2022, 1,280,977 applications under Article 3(1) of the Special Law were registered by the Polish Border Guard, 753,853 were accepted and 527,124 were rejected (information from the Border Guard's Headquarters, 9 February 2023).

had to be submitted no later than 90 days upon arrival to Poland.<sup>87</sup> Since 28 January 2023, a new 30-day time limit (from arrival to Poland) to apply for a 'PESEL UKR' was introduced.<sup>88</sup> In May 2024, the Special Law was again amended by repealing the 30-day time limit and requiring submitting the application for a 'PESEL UKR' immediately upon entering Poland.

Human Rights Commissioner reported in 2022 long waiting periods – of even a couple of months – for obtaining a PESEL number by Ukrainian nationals and members of their family. It hampered access to some rights, in particular social welfare.<sup>89</sup> In 2023-2025, the situation seems to have improved. However, language barrier and working hours of the respective offices continued to hamper access to registration for Ukrainian nationals, especially for single mothers.<sup>90</sup>

The Special Law stated that local authorities refuse to give 'PESEL UKR' in two situations: when a photo submitted with an application is incorrect and when fingerprints were not taken and no exceptions to fingerprinting apply. Appealing against this decision to the second instance administrative authority was excluded.<sup>91</sup> It is unclear whether a judicial remedy was available in those circumstances.<sup>92</sup>

The Special Law did not provide a clear answer to the question of how local authorities should act if a person concerned was considered not eligible for temporary protection. The lack of clear legal rules resulted in diverse practices throughout the country. In practice, as NGOs informed, Ukrainian nationals and their family members, who were refused to be issued with a 'PESEL UKR', were often informed about that only orally, no decision had been issued and no remedy was made available.<sup>93</sup>

### **General temporary protection (until March 2026)**

The Head of the Office for Foreigners issued a certificate confirming that a person concerned enjoyed temporary protection in Poland upon that person's request.<sup>94</sup> There was no deadline to make such a request. No other rules as regards the registration of persons enjoying temporary protection under the general mechanism were provided for in the Act on Protection. No procedure regarding registration and recognition has been established in the law. In particular, the Act on Protection did not specify what documents a person concerned must present to receive a certificate confirming that they enjoy temporary protection in Poland.

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<sup>87</sup> Article 3(2) of the Special Law, repealed as of 5 March 2026.

<sup>88</sup> Article 4(2) of the Special Law in force from 28 January 2023 until 4 March 2026. The change has been criticized by NGOs as not justified and only making the beneficiaries' lives harder, see SIP, Letter to the Ministry of Internal Affairs and Administration, 28 October 2022, available in Polish [here](#), 2-3.

<sup>89</sup> Human Rights Commissioner, 'Kolejki po PESEL przyczyną nierównego dostępu uchodźców do świadczeń. RPO pisze do minister Małag. Resort odpowiada', 6 and 29 April 2022, available in Polish here: <https://bit.ly/44ECTR3>. See also Jaroszewicz M., Krępa M., 'Stabilisation of Emergency Measures: Poland's Refugee Reception System One Month After the Russian Attack on Ukraine', in M. Ineli-Ciger, S. Carrera (eds), *EU Responses to the Large-Scale Refugee Displacement from Ukraine: An Analysis on the Temporary Protection Directive and Its Implications for the Future EU Asylum Policy*, EUI 2023, available [here](#), 169.

<sup>90</sup> See e.g. Nomada, DRC, 'Poland. Protection Monitoring Analysis. Lower Silesian Voivodeship', November 2023, available [here](#), 10.

<sup>91</sup> Article 4(16-17) of the Special Law, repealed as of 5 March 2026.

<sup>92</sup> Klaus W. (ed), *Ustawa o pomocy obywatelom Ukrainy w związku z konfliktem zbrojnym na terytorium tego państwa. Komentarz*, Wolters Kluwer 2022, 53. Cf. HFHR, 'Opinion of the Helsinki Foundation for Human Rights on Incompliance of Certain National Regulations Concerning Temporary Protection with Relevant Provisions of the European Union Law', 15 July 2022, available [here](#), 6. See also M. Łysienia, 'Following the EU Response to the Russian Invasion of Ukraine? The Implementation of the Temporary Protection Directive in Poland', CEEMR vol. 12 no. 1, 2023, available [here](#), 193-194.

<sup>93</sup> See e.g. HFHR, 'Opinion of the Helsinki Foundation for Human Rights on Incompliance of Certain National Regulations Concerning Temporary Protection with Relevant Provisions of the European Union Law', 15 July 2022, available [here](#), 6; HFHR, Input to the EUAA's Asylum Report, February 2023, available in English [here](#), 8; SIP, Letter of 30 November 2022 to the European Commission, available in English [here](#), 3; HNLAC, 'Refugees from Ukraine: access to temporary protection in Poland after moving from another MS', 12 December 2022, available [here](#). SIP, 'SIP w działaniu. Raport z działalności Stowarzyszenia Interwencji Prawnej w 2022 r.', September 2023, available in Polish [here](#), 10-11; Mapuj Pomoc, Odpowiedź MSWiA na apel ws. statusu UKR, 2 February 2024, available in Polish [here](#).

<sup>94</sup> Article 110(5) of the Act on Protection, repealed as of 5 March 2026.

In practice, persons willing to be recognised as temporary protection beneficiaries under the Act on Protection could personally inform about that the Office for Foreigners or send an application by letter or online. According to the Office for Foreigners, to be recognised as temporary protection beneficiaries, they had to submit the following documents:

- ❖ Identity documents;
- ❖ Documents confirming that a person concerned was an international protection beneficiary in Ukraine or had a permanent residence permit there, as well as that they left Ukraine on or after 24 February 2022 (in particular, travel document);
- ❖ A statement that a person concerned is unable to return in safe and durable conditions to their country or region of origin;
- ❖ Other documents, if needed, e.g. school certificates, birth certificates, concerning living in Ukraine, especially documents confirming family relations.<sup>95</sup>

The Office for Foreigners stated in 2023 that, in the procedure concerning temporary protection, the statelessness of a person concerned is established based on their passport/identity document and statements.<sup>96</sup> However, the Human Rights Commissioner and NGOs indicated that stateless persons who do not have any document confirming their identity or statelessness may have difficulties accessing temporary protection in Poland.<sup>97</sup>

The Office for Foreigners did not gather information with regards to the length of the waiting period for the certificate to be issued.<sup>98</sup> It is unknown how long beneficiaries had to wait for the certificate.

The Act on Protection did not provide for any appeal procedure in case of a denial of issuing a certificate (in case of not being recognised as a person enjoying temporary protection). The Office for Foreigners claimed that in such a case a decision is issued that can be appealed to the Head of the Office for Foreigners (for a reconsideration) or directly to the administrative courts.<sup>99</sup> However, it is unknown how many persons were denied this protection, and whether and to what extent the abovementioned remedy was used in practice.

### **Merged temporary protection (since March 2026)**

#### *New rules*

Since 5 March 2026, the stay of all temporary protection beneficiaries is considered legal from the day of their entry to Poland.<sup>100</sup> They are all eligible to receive 'PESEL UKR'. The application must be submitted in 30 days from crossing the Polish border.<sup>101</sup> Otherwise, the protection expires.<sup>102</sup> Besides the deadline, the procedure on receiving 'PESEL UKR' was generally not changed in comparison with the rules applicable to special temporary protection beneficiaries, only now it is regulated in another act.<sup>103</sup>

#### *Transitional provisions*

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<sup>95</sup> Information from the Office for Foreigners, 17 January 2023, and published by the Office online: [here](#) and [here](#).

<sup>96</sup> Letter of the Head of the Office for Foreigners to the Human Rights Commissioner of 20 September 2023, available in Polish [here](#).

<sup>97</sup> Human Rights Commissioner, 'Problemy bezpaństwowców - uchodźców z Ukrainy. Odpowiedź Szefa Urzędu ds. Cudzoziemców', 7 and 27 September 2023, available in Polish [here](#). HNLAC, 'Refugees from Ukraine: stateless persons and persons at risk of being stateless. Most important challenges', 21 November 2022, available [here](#). K. Przybyłowska, 'Stateless persons from Ukraine seeking protection in Poland', HNLAC, 16 October 2023, available in English [here](#).

<sup>98</sup> Information from the Office for Foreigners, 17 January 2023, February 2024, 14 March 2025.

<sup>99</sup> Ibid. See also governmental information published [here](#).

<sup>100</sup> Article 106(1) of the Act on Protection, in force since 5 March 2026.

<sup>101</sup> Article 110a of the Act on Protection, in force since 5 March 2026.

<sup>102</sup> Article 109b of the Act on Protection, in force since 5 March 2026.

<sup>103</sup> Ustawa z dnia 24 września 2010 r. o ewidencji ludności (hereinafter: the Population Registry Law) (chapter 5a).

Certificates confirming that a person concerned enjoyed temporary protection in Poland issued before March 2026 remain valid until 4 March 2027, unless this person receives 'PESEL UKR' or the certificate is invalidated (see [Residence permit](#)).<sup>104</sup> General temporary protection beneficiaries may apply for 'PESEL UKR' if they legally came to Poland on or after 24 February 2022 due to the war in Ukraine and their certificate was not invalidated before 5 March 2026.<sup>105</sup>

#### 4. Legal assistance

Under the Special Law, only temporary guardians and unaccompanied children enjoying temporary protection in Poland (see [Guarantees for vulnerable groups](#)) had an explicit right to access legal assistance. They can benefit from the general legal aid system, in the same way as Polish citizens.<sup>106</sup> Similar right has been provided – since 1 July 2024 – to children covered by the Ukrainian institutional foster care.<sup>107</sup> Apart from that, no state legal assistance was guaranteed in the temporary protection law. State legal aid system for asylum seekers and persons deprived of international protection is not available to persons displaced from Ukraine (unless they apply for international protection). Since March 2026, even temporary guardians and unaccompanied children cannot benefit from the state legal aid system.

In practice, in 2022-2025, legal aid has been provided *pro bono* to Ukrainian nationals and other persons fleeing the war in Ukraine by NGOs, law associations and individual lawyers.<sup>108</sup> To name some initiatives of Polish civil society organisations, SIP created a special portal where questions about the law applicable to temporary protection beneficiaries and other persons fleeing the war in Ukraine, could have been asked. The answers were published online.<sup>109</sup> Another NGO, HNLAC, provided free legal aid for Ukrainian nationals in 13 different locations in 2022 and 11 locations in 2023 and 2024, and operated a dedicated helpline.<sup>110</sup> Also some Polish authorities offered special access to legal assistance.

The provision of legal assistance to temporary protection beneficiaries and other persons fleeing the war in Ukraine was hampered by the fact that the Polish law on temporary protection is of low quality, faulty, ambiguous, and overly complicated. Moreover, as of 2 March 2026, the Special Law has been changed 34 times and further amendments have been presented.

In February 2024, Polish and international organisations appealed to donors to continue to support persons displaced from Ukraine staying in Poland. The appeal was prompted by the decreasing funds provided for this purpose by the international community.<sup>111</sup> In 2025, the problems with funding increased due to the limitation or withdrawal of financial support by UN-related institutions. NGOs were forced to lay off some of their employees and to reduce remunerations of others, significantly affecting the scope of free legal assistance granted to Ukrainian nationals statewide.<sup>112</sup>

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<sup>104</sup> Article 20(1) of the Phasing-Out Law.

<sup>105</sup> Article 20(4) of the Phasing-Out Law.

<sup>106</sup> Article 25(3aa) of the Special Law, repealed as of 5 March 2026.

<sup>107</sup> Article 25<sup>1</sup>(5) of the Special Law, in force from 1 July 2024 until 4 March 2026.

<sup>108</sup> E.g. SIP informed that from 24 February 2022 until the end of the year, it assisted over 3.500 persons fleeing the war in Ukraine (SIP Facebook post of 12 February 2023) – the assistance continued in 2023 (SIP, 'We have an impact! A summary of key SIP activities in 2023', 5 March 2024, available in English [here](#)); HNLAC, with supporting attorneys-at-law, provided assistance to over 300 persons until the end of June 2022: 'Dziękujemy prawnikom pro bono za pomoc prawną dla uchodźców z Ukrainy!', [here](#). See also legal assistance coordinated by the Krajowa Izba Radców Prawnych: [here](#), and Naczelna Rada Adwokacka: [here](#). See also HFHR, *Input to the EUAA's Asylum Report*, February 2023, available in English [here](#), 4.

<sup>109</sup> See [here](#). In 2023, it was viewed 900.000 times (see SIP, 'We have an impact! A summary of key SIP activities in 2023', 5 March 2024, available in English [here](#)).

<sup>110</sup> HNLAC, 'Refugees from Ukraine: stateless persons and persons at risk of being stateless. Most important challenges', 21 November 2022, available [here](#). HNLAC, 'Summary of 2023 at the Halina Nieć Legal Aid Center', 13 March 2024, available [here](#). HNLAC, 'Annual Report: 2024 Report and Plans for 2025', available in English [here](#).

<sup>111</sup> BRPD, Mocny apel o pomoc uchodźcom z Ukrainy w Polsce, 15 February 2024, available in Polish [here](#).

<sup>112</sup> See e.g. HNLAC, '23 lata bezpłatnej pomocy prawnej dla uchodźców – grozi nam zamknięcie! Pomóż nam dalej działać!', 2025, available in Polish [here](#); Nomada, 'Decyzja władz Stanów Zjednoczonych o wstrzymaniu pieniędzy na pomoc humanitarną doprowadziła do poważnego kryzysu również w Polsce', May 2025, available in Polish [here](#).

## 5. Information provision and access to NGOs

Under the Special Law, there were no specific rules as regards the information provision for persons enjoying temporary protection.

Under Article 111 of the Act on Protection, a temporary protection beneficiary must be informed in the language that they understand about the procedure concerning temporary protection, as well as about their rights and obligations in this context. Since April 15, 2022, this information may be published online, on the website of the Office for Foreigners, where, in practice, details regarding eligibility, residence permits, social and medical assistance, employment, and education have been made available. It is available in four languages: Ukrainian, Russian, English and Polish.<sup>113</sup> Since 5 March 2026, Article 111 of the Act on Protection applies to all temporary protection beneficiaries in Poland.

Moreover, under Article 118(2) of the Act on Protection, the Head of the Office for Foreigners is obliged to inform a temporary protection beneficiary in a language that they understand about all circumstances that may be of significance when a person concerned considers returning to their country of origin. However, this provision applies only when the temporary protection regime no longer applies, thus, it has not been applied yet.

In practice, in 2022-2025, information for Ukrainian nationals and other persons fleeing the war in Ukraine has been mostly provided by NGOs and local authorities.<sup>114</sup> Access to information was particularly difficult in the first days of the war.<sup>115</sup> To provide quick access to important information, SIP created a special portal – in Ukrainian, English and Polish – where questions about the law applicable to temporary protection beneficiaries and other persons fleeing the war in Ukraine, were asked and answered. IOM also activated a special website - in Polish and Ukrainian language – concerning legal employment in Poland.<sup>116</sup> NGOs also published leaflets and brochures with the information needed by persons fleeing the war in Ukraine, concerning e.g.:

1. unaccompanied children from Ukraine;<sup>117</sup>
2. financial allowances for Ukrainian nationals who came to Poland on or after 24 February 2022;<sup>118</sup>
3. financial allowances for persons with disabilities, including those having 'PESEL UKR',<sup>119</sup>
4. persons with disabilities,<sup>120</sup>
5. restoration of PESEL UKR and social benefits,<sup>121</sup>
6. collective accommodation.<sup>122</sup>

Despite those efforts, there have been a lot of chaos and disinformation with regard to the legal situation of persons displaced from Ukraine staying in Poland.<sup>123</sup> According to UNHCR, '20% of those interviewed report the need for information on their legal status. Interviews with refugees indicate that both uncertainties around the extension of Temporary Protection and incidents relating to the withdrawal of status and deactivation of PESEL UKR could be factors for this need to still feature so prominently among

<sup>113</sup> See Office for Foreigners' website, [here](#).

<sup>114</sup> For example, see S. Jarosz and W. Klaus (eds), 'Polska szkoła pomagania', Konsorcjum Migracyjne, OBMF and CeBaM 2023, available in Polish [here](#), 29-30; Ukraiński Dom and Open Space Works Ukraine, "We barely have time to celebrate our wins ... or to process what we've lost", 2025, available [here](#).

<sup>115</sup> See e.g. HFHR, Input to the EUAA's Asylum Report, February 2023, available in English [here](#), 3-4.

<sup>116</sup> See [here](#) and [here](#).

<sup>117</sup> SIP, 'Udostępniamy broszurę Dziecko bez opieki w Polsce i Ukrainie', 28 April 2022, available in Polish and Ukrainian [here](#), HNLAC, 'Opieka tymczasowa nad małoletnim z Ukrainy - poradnik dla opiekunów', April 2023, available in Polish [here](#). In Ukrainian [here](#).

<sup>118</sup> SIP, UNHCR, 'Świadczenia dla obywateli i obywaterek Ukrainy – broszura', January 2023, available in Polish and Ukrainian [here](#).

<sup>119</sup> HNLAC, 'Świadczenia dla cudzoziemców z niepełnosprawnością, w tym dla osób z PESEL UKR', available in Polish and Ukrainian, [here](#).

<sup>120</sup> SIP, 'Informator dla osób z niepełnosprawnością, które przybyły do Polski w wyniku wojny w Ukrainie', July 2023, available in Polish [here](#) and Ukrainian [here](#).

<sup>121</sup> HNLAC, 'Instrukcja wznowienia świadczenia wychowawczego 500+ dla rodziców dzieci z Ukrainy', 20 November 2023, available in Polish and Ukrainian [here](#).

<sup>122</sup> SIP, 'Centra zbiorowego zakwaterowania. Poradnik dla osób przybyłych z Ukrainy', June 2023, available in Polish [here](#) and in Ukrainian [here](#).

<sup>123</sup> HFHR, Input to the EUAA's Asylum Report, February 2023, available in English [here](#). 4.

both early and new arrivals' (for the latter, see also [Movement and mobility](#) and [Social welfare](#)).<sup>124</sup> The study of CARE also confirmed a low awareness amongst Ukrainian nationals of their rights associated with the temporary protection status.<sup>125</sup>

In February 2024, Polish and international organisations appealed to donors to continue to support persons displaced from Ukraine staying in Poland. The appeal was prompted by the decreasing funds provided for this purpose by the international community.<sup>126</sup> The financial situation of Polish NGOs worsened in 2025 (see [Legal assistance](#)).

## D. Guarantees for vulnerable groups

Under the Special Law and the Act on Protection, there is no identification mechanism provided for to systematically identify temporary protection beneficiaries with special reception or procedural needs arising from their vulnerability. However, some special solutions have been introduced with regard to particular groups of vulnerable persons.

### *Accommodation*

The vulnerability of some temporary protection beneficiaries has been noticed in the rules concerning their accommodation in Poland. However, support in this respect diminished significantly over time.

First, until 1 July 2024, the Special Law provided for a financial allowance for persons who offered accommodation and food to special temporary protection beneficiaries (40+ allowance, for more see [Housing](#)). This assistance was limited to 120 days, but it could be prolonged if it concerned:

- a. Persons with disabilities,
- b. Elderly;
- c. Pregnant women and mothers of children of up to 1 year old,
- d. Single parents taking care of three or more children,
- e. Unaccompanied children.<sup>127</sup>

However, in May 2024, the respective rules were changed and this special allowance is no longer granted – even in case of vulnerable beneficiaries.

Second, from 1 March 2023 to 31 October 2025, cost-free accommodation for special temporary protection beneficiaries was limited to 120 days, afterwards, they had to participate in the costs of accommodation (for more see [Housing](#)). However, the co-payment obligation did not apply to:

- a. Persons with disabilities,
- b. Elderly;
- c. Pregnant women and mothers of children of up to 1 year old,
- d. Single parents taking care of three or more children (according to the Special Law amendment of 15 May 2024, in force from 1 July 2024, only if at least one of the children was not older than 14 years old),
- e. Children (according to the Special Law amendment of 15 May 2024, in force from 1 July 2024, only of those who are in a foster care or who do not receive a 800+ financial allowance; if they get this allowance, then they are eligible for a reduced co-payment obligation),
- f. Persons in a difficult individual situation that prevents them from contributing to the costs.<sup>128</sup>

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<sup>124</sup> UNHCR, 'Poland: Joint Protection Analysis', October 2023, available [here](#), 8-9.

<sup>125</sup> CARE, 'In the Shadows. Ukrainian Domestic Workers in Poland', 25 October 2023, available [here](#), 33.

<sup>126</sup> BRPD, Mocny apel o pomoc uchodźcom z Ukrainy w Polsce, 15 February 2024, available in Polish [here](#).  
Ukraiński Dom and Open Space Works Ukraine, "We barely have time to celebrate our wins ... or to process what we've lost", 2025, available [here](#).

<sup>127</sup> Article 13 of the Special Law (in force until 1 July 2024) and §4 of the Ordinance of 4 May 2022 (Rozporządzenie Rady Ministrów z dnia 4 maja 2022 r. w sprawie maksymalnej wysokości świadczenia pieniężnego przysługującego z tytułu zapewnienia zakwaterowania i wyżywienia obywatelom Ukrainy oraz warunków przyznawania tego świadczenia i przedłużania jego wypłaty), available in Polish [here](#).

<sup>128</sup> Article 12(17c) of the Special Law, repealed as of 5 March 2026.

It was not specified in law how it should be assessed whether a person concerned qualifies for the exemption from the co-payment obligation. In July 2023, the Ministry of Internal Affairs and Administration claimed that these rules were intentionally vague to allow flexibility of local authorities. It also prepared a recommendation for these authorities on how the situation (vulnerability) of a Ukrainian national should be assessed.<sup>129</sup> However, studies have shown that there was no coherency in interpreting and applying these rules<sup>130</sup> (for more, see [Housing](#)).

In September 2025 the law concerning accommodation of special temporary protection beneficiaries was changed once again. Rules on the co-payment were repealed. Since November 2025, only some vulnerable temporary protection beneficiaries could benefit from cost-free accommodation, e.g.

- a. Persons with a disability certificate recognised by Polish authorities (Ukrainian disability certificates were not recognised);
- b. Elderly not benefitting from Polish pension (irrespective of its amount);
- c. Pregnant women and carers of children of up to 1 year old,
- d. Single parents taking care of three or more children, if at least one child is not older than 7 years old;
- e. Children, who do not receive a 800+ allowance, and their temporary guardians.

The Human Rights Commissioner and NGOs argued that not all vulnerable persons in need of accommodation are covered by the new rules (e.g. violence victims, persons with psychological problems, persons in difficult financial situation, single mothers of older children, disabled persons not having Polish certificates of disability) and that the law is incoherent with TPD.<sup>131</sup>

Since March 2026, vulnerable temporary protection beneficiaries *may* be given access to collective accommodation with full board only if they cannot organise housing by themselves.<sup>132</sup> The list of “vulnerable persons” changed again and now includes:

- a. Persons with a disability certificate recognised by Polish authorities (Ukrainian disability certificates are not recognised) and their carers (of they do not receive dedicated benefits);
- b. Elderly not benefitting from Polish pension (irrespective of its amount), not working or receiving alimony;
- c. Pregnant women and carers of children of up to 1 year old,
- d. Unaccompanied children within foreign foster care;
- e. Persons upon their hospitalisation in Poland financed from National Health Fund and lasting at least 7 days.<sup>133</sup>

### *Unaccompanied children*

Until 13 January 2023, in total 633,660 children were given a ‘PESEL UKR’. Most of them were accompanied by a parent, however, according to the Ministry of Digital Affairs, at least 3,690 were unaccompanied. At the end of 2024, there were 10,460 unaccompanied children with PESEL UKR in Poland, and 439,020 accompanied ones.<sup>134</sup> As of 31 December 2025, there were 11,300 unaccompanied children with PESEL UKR in Poland and 436,400 accompanied ones.<sup>135</sup>

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<sup>129</sup> For more, see previous AIDA reports, available [here](#).

<sup>130</sup> S. Jarosz, W. Klaus (eds), ‘W puknie wyjscia. Monitoring zbiorowego zakwaterowania uchodźczyń z Ukrainy w 2023 r. w świetle zmian ustawowych’, Migration Consortium, August 2023, available in Polish [here](#).

<sup>131</sup> Human Rights Commissioner, ‘Opinia RPO do projektu zmian w ustawie o pomocy obywatelom Ukrainy’, 24 July 2025, available in Polish [here](#); SIP, ‘Komentarz do projektu ustawy o zmianie Ustawy o pomocy obywatelom Ukrainy...’, July 2025, available in Polish [here](#); PFM, ‘Osoby w najtrudniejszej sytuacji życiowej, mieszkające dotychczas z OZZ zagrożone kryzysem bezdomności!’, 30 October 2025, available in Polish [here](#).

<sup>132</sup> Article 112(3) of the Act on Protection, in force since 5 March 2026.

<sup>133</sup> Article 112(5) of the Act on Protection, in force since 5 March 2026.

<sup>134</sup> Information provided by the Ministry of Digital Affairs, 20 March 2025.

<sup>135</sup> Information provided by the Ministry of Digital Affairs, 2 March 2026.

A special registry of Ukrainian unaccompanied children was established in 2022.<sup>136</sup> Not all unaccompanied children were inscribed in this registry due to gaps in law and in practice.<sup>137</sup> As of 31 December 2025, 165 unaccompanied Ukrainian children, and 1,003 children who benefited from foster care in Ukraine, were registered in this registry. 67 unaccompanied children and 22 children who benefited from foster care in Ukraine were added to the registry in 2025.<sup>138</sup>

For Ukrainian unaccompanied children, a special, new solution was introduced in 2022 under Article 25 of the Special Law: a temporary guardian. A temporary guardian represents a Ukrainian unaccompanied minor and has custody over their person and property. Important decisions concerning an unaccompanied minor and their property require the court's consent. Temporary guardians should be supervised by local authorities, but the authorities struggle with fulfilling this obligation in practice.

Temporary guardians are appointed by courts. A temporary guardian should be a child's relative or, at least, a person guaranteeing the proper performance of duties. The child's best interest should be taken into account. Proceedings on temporary guardianship are initiated *ex officio* or on motion and should last up to 3 days. A court hears a candidate for a guardian, and a child concerned, if their mental development, state of health and degree of maturity allows for it. A court should take into account the minor's opinion where possible. In particularly justified cases, a court can limit the proceedings to the documents' analysis.

Temporary guardians are registered in the special registry too, albeit not all of them. At the end of 2025, there were 374 temporary guardians registered in this registry. However, another governmental database indicates on 18,096 temporary guardians taking care over 24,812 children at this time.<sup>139</sup>

Furthermore, a minor special temporary protection beneficiary could be taken care of by a foster family or be accommodated in a family children's home created or run by another special temporary protection beneficiary even though the latter does not fulfil all legal requirements in this regard (i.e. they are lacking a proper training).<sup>140</sup> Moreover, in justified cases, a care and education facility could be opened – only for Ukrainian children – without fulfilling all legal requirements in this regard. Special rules have been also established to enable Ukrainian nationals enjoying special temporary protection to work in the Polish foster care system.<sup>141</sup>

Until March 2026, for an unaccompanied general temporary protection beneficiary, a guardian was appointed by a court upon the motion of the Head of the Office for Foreigners.<sup>142</sup> Since 2026, a temporary guardian is established for all temporary protection beneficiaries.

In March 2022, the Border Guard established a special procedure applied when an unaccompanied minor is crossing the Polish-Ukrainian border. Those internal guidelines were sent to the border check points on 21 March 2022.<sup>143</sup>

In June 2022, Ukrainian and Polish Social Policy Ministries signed a political declaration concerning the situation of Ukrainian children in Poland. The Ministries agreed to support a voluntary return of those children to Ukraine, to exchange needed information, to register all Ukrainian unaccompanied children staying in Poland in the special registry, to not initiate, and suspend initiated, adoption procedures concerning Ukrainian children, and to provide free legal assistance and all relevant information to

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<sup>136</sup> Article 25a-25b of the Special Law. Since 5 March 2026, Article 113b-113c of the Act on Protection.

<sup>137</sup> SIP, Letter to the Ministry of Internal Affairs and Administration, 28 October 2022, available in Polish [here](#), 17. See also K. Przybysławska, 'Stateless persons from Ukraine seeking protection in Poland', HNLAC, 16 October 2023, available in English [here](#), 8; Fundacja Dajemy Dzieciom Siłę, 'Dzieci się liczą 2022', 2022, available in Polish [here](#), 363-364.

<sup>138</sup> Information provided by the Ministry of Family, Labour and Social Affairs, 21 January 2026.

<sup>139</sup> Information provided by the Ministry of Family, Labour and Social Affairs, 30 April 2026.

<sup>140</sup> Since March 2026, Article 113d of the Act on Protection.

<sup>141</sup> Article 27 of the Special Law in force until 5 March 2026.

<sup>142</sup> Article 113 of the Act on Protection.

<sup>143</sup> Human Rights Commissioner, 'Systemowo chronić grupy wrażliwe wśród uchodźców z Ukrainy. Odpowiedź pełnomocnika rządu ds. uchodźców z Ukrainy', 8 April and 13 July 2022, available in Polish [here](#).

Ukrainian children staying in Poland. Moreover, Poland declared that it intends to provide 'high quality care for children from Ukrainian institutions'.<sup>144</sup>

In October 2022, Helsinki Foundation for Human Rights published a report concerning unaccompanied children from Ukraine staying in Poland, specifying numerous gaps and malfunctions as regards the Ukrainian children's arrival to Poland and temporary guardianship system.<sup>145</sup> In December 2022, NGOs alarmed Polish authorities about the dangers and needs of unaccompanied children displaced from Ukraine and staying in Poland.<sup>146</sup> Civil society called for:

- ❖ Adopting clear rules as regards the appointment, control, time limits and relieve of duties of temporary guardians,
- ❖ More transparent and comprehensive data collection as regards those children and their temporary guardians,
- ❖ Providing needed assistance to children from Ukrainian foster care who reached the age of majority,
- ❖ Abolition of double standards between Polish and Ukrainian children in foster care,
- ❖ Monitoring of the foster care personnel from Ukraine,
- ❖ Unifying the rules concerning temporary protection to all its minor beneficiaries (there are different rules for children from Ukraine and for other minor beneficiaries).

In May 2023, unaccompanied children from Ukrainian foster care started to be returned to Ukraine with their guardians. It caused an outcry from national and international organisations. Save the Children, IRC and CARE appealed to stop the returns. They were 'deeply concerned about reports that children from institutional care centres are being sent back to Ukraine without an assessment of whether this is in their best interests and without coordinated preparation and planning'.<sup>147</sup> In July 2023, UNHCR published a guidance "Voluntary Return to Ukraine of Refugee Children without Parental Care, including Unaccompanied Children and Children Evacuated from Care Institutions in Ukraine".<sup>148</sup> Polish NGOs and Human Rights Commissioner also expressed concerns about the children's return to Ukraine. However, the Polish Ministry of Family and Social Policy consistently stated that the unaccompanied children are returned on the basis of the Ukrainian authorities' decisions (and the children's guardians) and there is no possibility to stop these transfers by Polish authorities.<sup>149</sup> According to the Ministry of Family, Labour and Social Affairs, in 2023-2025, 876 unaccompanied children from Ukrainian foster care were returned to Ukraine (164 in 2025).<sup>150</sup>

The amendment of the Special Law of 15 May 2024, by adding Article 25<sup>1</sup>, introduced some means of oversight by the Polish authorities over children covered by the Ukrainian institutional foster care while they are staying in Poland. The amendment responded to calls of civil society that reported on cases of abuse in Ukrainian institutional foster care homes located in Poland. For example, in May 2024, a criminal investigation was initiated as regards a director of such a home due to suspicion of physical abuse of children under his care.<sup>151</sup> In September 2025, Article 25<sup>1</sup> was changed to include the obligation to provide appropriate care and upbringing conditions to these children, including respect for children's rights. A

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<sup>144</sup> Ministry of Family and Social Affairs, 'Polskie i ukraińskie ministerstwa podpisały deklarację w sprawie ochrony dzieci', 30 June 2022, available here in Polish, with the declaration in English, [here](#).

<sup>145</sup> HFHR, 'Dzieci z pieczy zastępczej oraz małoletni bez opieki z Ukrainy: ocena ex-post regulacji i praktyki stosowania specustawy ukraińskiej', October 2022, available in Polish [here](#).

<sup>146</sup> SIP, 'Protection of unaccompanied children from Ukraine in Poland – what should be improved', 6 March 2023, available [here](#).

<sup>147</sup> Save the Children, IRC, CARE, 'NGOs call for halt to returning children in institutional care centres from Poland to Ukraine', 15 May 2023, available [here](#).

<sup>148</sup> UNHCR, 'Voluntary Return to Ukraine of Refugee Children without Parental Care, including Unaccompanied Children and Children Evacuated from Care Institutions in Ukraine', July 2023, available [here](#).

<sup>149</sup> Human Rights Commissioner, 'Wobec ukraińskich dzieci uchodźczych mają być organizowane powroty do Ukrainy. Kolejna odpowiedź MRiPS', 12 June, 31 October and 14 November 2023, available in Polish [here](#). See also HNLAC, 'Stanowisko UNHCR w sprawie w sprawie dobrowolnych powrotów do Ukrainy dzieci uchodźczych', 3 August 2023, available in Polish [here](#).

<sup>150</sup> Information from Ministry of Family, Labour and Social Affairs, 23 February 2024, 6 February 2025 and 21 January 2026.

<sup>151</sup> PolskieRadio24.pl, 'Zarzuty dla dyrektora ukraińskiego domu dziecka w Polsce. Chodzi o przemoc fizyczną', 3 September 2024, available in Polish [here](#).

special regulation should be also issued specifying how this oversight should be conducted.<sup>152</sup> However, as of April 2026, no such regulation has been adopted.

In February 2024, the Human Rights Commissioner also noticed the problems of unaccompanied children from Ukraine who reached the age of majority (18 years old). They needed to leave the foster care system then, even if they continued education.<sup>153</sup> In May 2024, some solutions to these problems were provided: upon the amendments, it is possible to remain in the foster care system until reaching 25 years old if a Ukrainian national concerned continues education or professional training. Some other means of support were also guaranteed for a person leaving the foster care (Polish and Ukrainian).<sup>154</sup> These rules were in force only until 5 March 2026, however, persons who already benefited from the solutions provided for in Article 27a of the Special Law before 5 March 2026 can continue to be supported until they turn 25 or temporary protection ends.<sup>155</sup>

#### *Torture survivors and traumatised beneficiaries*

Until March 2026, Ukrainian nationals and their family members enjoying special temporary protection could access the general healthcare system in Poland (see [Health care](#)). Furthermore, Ukrainian psychologists were allowed to provide psychological assistance to their compatriots, but only until 24 August 2023 and again from 1 July 2024 to 4 March 2026. The gap in the provision of psychological assistance by Ukrainian nationals was criticised.<sup>156</sup> A special temporary protection beneficiary could be also provided with free-of-charge psychological assistance. Providing this assistance was at the discretion of local authorities.<sup>157</sup> Psychological assistance was only guaranteed by law with regard to temporary guardians and unaccompanied children under their care who benefited from the Ukrainian foster care system, but the respective provision was repealed in May 2024, albeit not for children covered by the Ukrainian institutional foster care system.<sup>158</sup> The general discretion of authorities as regards the provision of psychological assistance and the gross limitation of the personal scope of this assistance, was considered to be against Article 13(4) of the TPD.<sup>159</sup>

Until March 2026, general temporary protection beneficiaries had access to the same medical assistance as asylum seekers. This was criticised for several years, in particular due to the fact that the specialised treatment for victims of torture or traumatised third-country nationals has not been available in practice (see [General report – Healthcare](#)).

Since March 2026, access of all temporary protection beneficiaries to medical assistance in Poland has been severely limited (see [Health care](#)), but torture survivors and rape victims, as well as persons who were injured in the war in Ukraine can still benefit from the general healthcare system.<sup>160</sup> The abovementioned rules concerning Ukrainian psychologists and access to psychological assistance, however, no longer apply.

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<sup>152</sup> Since 5 March 2026, under Article 113a(7) of the Act on Protection.

<sup>153</sup> Human Rights Commissioner, 'Dzieci-uchodźcy z Ukrainy muszą opuścić pieczę zastępczą po ukończeniu 18 lat. Wystąpienie do MRPiPS', 12 February 2024, available in Polish [here](#).

<sup>154</sup> Article 27a-27c of the Special Law, in force from 1 July 2024 to 4 March 2026.

<sup>155</sup> Article 24(2) of the Phasing-Out Law.

<sup>156</sup> Articles 64a and 64b of the Special Law, repealed in March 2026. See also Human Rights Commissioner, 'Ukraińcom chorującym psychicznie potrzebna jest pilna pomoc. RPO apeluje do premiera. MRiPS informuje: będzie zmiana specustawy', 25 March and 8 April 2022, available in Polish [here](#). Human Rights Commissioner, 'Psychologowie z Ukrainy stracili prawo wykonywania zawodu w Polsce. RPO pisze do marszałek Senatu', 2 October and 20 November 2023, 24 January, 13 February and 19 February 2024, available in Polish [here](#).

<sup>157</sup> Article 32 of the Special Law, repealed in March 2026.

<sup>158</sup> Article 25(3b) of the Special Law, repealed by the Special Law amendment of 15 May 2024, and Article 25<sup>1</sup>(6), both repealed in March 2026.

<sup>159</sup> SIP, *Letter to the Ministry of Internal Affairs and Administration*, 28 October 2022, available in Polish [here](#), 18-19.

<sup>160</sup> Article 112c(1) of the Act on Protection, in force since March 2026.

According to the CoE’s report on the mission to Poland in 2026,<sup>161</sup> “Psychosocial support and mental health care for refugee children is in high demand, but access is reportedly constrained by language barriers, awareness, and service capacity.”

### Persons with disabilities

Under Article 4(2) of the Special Law, until 30 September 2025, persons with disabilities could apply for a ‘PESEL UKR’ in their place of stay, e.g. an apartment or reception centre. Starting in October 2025, they had to apply for it in person, with no exceptions possible. Since March 2026, ‘PESEL UKR’ may be granted *ex officio* in those circumstances.

Persons with disabilities can be accommodated by Polish authorities, however since 1 November 2025 a disability certificate recognised by the Polish authorities must be shown to be provided with this accommodation. Meanwhile, Ukrainian disability certificates are not recognised by Polish authorities.

The Special Law also enabled financial support for persons with disabilities from some public funds, however the respective provisions were repealed in March 2026.<sup>162</sup> In 2022, 17,994 persons benefited from this assistance, with 4,674 beneficiaries in 2024.<sup>163</sup> Governmental programs offering special assistants to persons with disabilities were changed to include Ukrainian nationals with disabilities. Moreover, special reception centres for persons with disabilities were created in two voivodeships: podkarpackie and lubelskie.<sup>164</sup> However, in Warsaw where many disabled Ukrainians come and seek assistance, accommodation adapted to the needs of disabled persons is insufficiently provided. In May 2024, only one centre – with 26 places – was available to them, in Milanówek near Warsaw.<sup>165</sup>

Ukrainian certificates of disability have not been recognised in Poland.<sup>166</sup> To access some forms of assistance for persons with disabilities, a decision in this regard, issued by the competent Polish authorities, is required. No special rules have been established to facilitate Ukrainian nationals’ recognition of disability in Poland. According to the Polish government, as of September 2022, 5,830 Ukrainian nationals applied for being recognised as a person with disability, 3,776 received positive decision, 109 appealed to a first-instance decision.<sup>167</sup> Data as regards 2023-2025 are provided below.

Number of Ukrainian nationals			
	Applications for being recognised as a person with disability	Positive decisions	Appeals
2023	8,170	7,531	500
2024	7,222	5,188	349
2025	6,879	5,152	332

<sup>161</sup> Council of Europe Directorate of human rights division on migration and refugees, *Report on the mission to Poland*, 4 – 5 February 2026, 1 April 2026, available [here](#), 8.

<sup>162</sup> Articles 26a, 34-36 of the Special Law, all repealed in March 2026. See [here](#). See also K. Heba, ‘Wsparcie osób z niepełnosprawnością’, in: SIP, ‘Informator dla osób z niepełnosprawnością, które przybyły do Polski w wyniku wojny w Ukrainie’, July 2023, available in Polish [here](#), 68-71, and here Human Rights Commissioner, ‘Pomoc dla uchodźców z Ukrainy z niepełnosprawnością słuchu wciąż niewystarczająca. Odpowiedź PFRON’, 30 April and 31 May 2024, available in Polish [here](#).

<sup>163</sup> Information provided by the Ministry of Family, Labour and Social Affairs, 6 February 2025.

<sup>164</sup> Human Rights Commissioner, ‘Jak wspierać uchodźców z Ukrainy z niepełnosprawnościami. Odpowiedź min. Pawła Szefernakera’, 5 May and 27 December 2022, available in Polish [here](#).

<sup>165</sup> Human Rights Commissioner, ‘Dostępność miejsc noclegowych w Warszawie dla uchodźców z niepełnosprawnościami. Wyjaśnienia Wojewody Mazowieckiego’, 6 and 17 May 2024, available in Polish [here](#).

<sup>166</sup> See also K. Heba, ‘Wsparcie osób z niepełnosprawnością’, in: SIP, ‘Informator dla osób z niepełnosprawnością, które przybyły do Polski w wyniku wojny w Ukrainie’, July 2023, available in Polish [here](#), 38; Fundacja Dajemy Dzieciom Siłę, ‘Dzieci się liczą 2022’, 2022, available in Polish [here](#), 359.

<sup>167</sup> Human Rights Commissioner, ‘Problemy uchodźców z Ukrainy z uzyskaniem orzeczeń o niepełnosprawności. Rzecznik interweniuje w MRiPS. Odpowiedź resortu’, 29 June and 5 October 2022, available in Polish [here](#). See also HFHR, *Input to the EUAA’s Asylum Report*, February 2023, available in English [here](#), 16; Amnesty International Polska, “‘Ukraińcom nie chcą wynajmować’. Najnowsze badania Amnesty International’, May 2023, available in Polish [here](#), 8-9.

Data based on information from Ministry of Family, Labour and Social Affairs, 23 February 2024, 6 February 2025 and 21 January 2026.

In October 2023, UNHCR counted “limited access to specialised services, especially for children with disabilities” as one of the main challenges faced by the Ukrainian children in Poland. The report mentioned in particular problems related to finding rehabilitation services and psychological help for children due to lack of specialised services or available places.<sup>168</sup>

In March 2024, the Human Rights Commissioner appealed again to the government for better support for deaf persons, in particular as regards their access to sign language translations and accommodation. The Ministry responded by indicating the possibilities to finance support for these persons, especially from the State Fund for Rehabilitation of Disabled People (PFRON).<sup>169</sup>

According to a study published in 2024, of the surveyed countries “Poland reported the lowest percentage of refugee individuals with a disability at 4%”.<sup>170</sup> However, according to the CoE’s report on its mission to Poland in 2026,<sup>171</sup> “Reportedly roughly 10% of children in Polish foster care have disabilities, a proportion that highlights the need for improved registration and specialised services.”

In 2025, IOM published a study on inclusion and accessibility of Polish-Ukrainian border crossings to persons with disabilities. The identified gaps included amongst others: service counters and inspection booths at unsuitable heights, lack of tactile and braille information, inconsistent or absent internal wayfinding, limited multilingual coverage, no designated wheelchair spaces and no disability-specific training.<sup>172</sup>

### *Roma minority*

Roma from Ukraine have been particularly exposed to discrimination when accessing accommodation and other assistance in Poland.<sup>173</sup> They also have struggled with accessing temporary protection, mostly due to the lack of required documents (see [Qualification for temporary protection](#)).<sup>174</sup>

In September 2022, Amnesty International informed that it received several reports of Roma from Ukraine being not able to access reception centres financed or managed by Polish authorities. Those who managed to be accommodated in those centres informed about the discrimination they experienced there. Persons working in the centres denied them information and assistance, granted less material support (e.g. clothes) or food, and accused them of stealing while having no proof. Roma were also spatially segregated leading to the inferior reception conditions. Meanwhile, finding a private accommodation proved to be more challenging for this group of third-country nationals, also due to the persisting prejudice towards Roma in the Polish society.<sup>175</sup>

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<sup>168</sup> UNHCR, ‘Poland: Joint Protection Analysis’, October 2023, available [here](#), 12-13.

<sup>169</sup> Human Rights Commissioner, ‘Należy zapewnić systemowe rozwiązania dotyczące pomocy głuchym uchodźcom z Ukrainy. Odpowiedź MRPiPS’, 13 March and 5 May 2024, available in Polish [here](#). See also the PFRON’s response explaining what supported was granted until February 2024 to persons displaced from Ukraine, Human Rights Commissioner, ‘Pomoc dla uchodźców z Ukrainy z niepełnosprawnością słuchu wciąż niewystarczająca. Odpowiedź PFRON’, 30 April and 31 May 2024, available in Polish [here](#).

<sup>170</sup> UNHCR, IOM, UNICEF, UN Women, WHO, ‘NAVIGATING HEALTH AND WELL-BEING CHALLENGES FOR REFUGEES FROM UKRAINE. An Inter-Agency Exploration of Data’, May 2024, available [here](#), 7.

<sup>171</sup> Council of Europe Directorate of human rights division on migration and refugees, *Report on the mission to Poland*, 4 – 5 February 2026, 1 April 2026, available [here](#), 8.

<sup>172</sup> IOM, ‘Accessibility and Inclusion of Persons with Disabilities at Border Crossing Points on the Poland-Ukraine Border’, August 2025, available [here](#).

<sup>173</sup> See also UNHCR, ‘Poland: Joint Protection Analysis’, October 2023, available [here](#), 17-18; ECRI, ‘ECRI Report on Poland (sixth monitoring cycle)’, 27 June 2023, available [here](#), 28; Amnesty International, ‘Summary of the annual research project “Refugees from Ukraine in Poland”’, June 2023, available [here](#), 2-3.

<sup>174</sup> K. Przybysławska, ‘Stateless persons from Ukraine seeking protection in Poland’, HNLAC, 16 October 2023, available in English [here](#), 5.

<sup>175</sup> AI, ‘Polska: „Przyjechalśmy tu, nie chcieli nas wpuścić”. Romowie z Ukrainy traktowani jak niechciani uchodźcy’, 27 September 2022, available in Polish [here](#). See also Human Rights Commissioner, ‘Systemowo chronić grupy wrażliwe wśród uchodźców z Ukrainy. Odpowiedź pełnomocnika rządu ds. uchodźców z

The situation of Roma have been particularly disturbing in Przemyśl, the city nearest to the border, especially at the railway station. Roma were not allowed to enter the overnight room at the station without the valid train ticket, while alternative accommodations proved challenging to secure. Access to sanitary facilities at the station was also hampered. The medical point was closed. Additionally, Roma were also discriminated in accessing the room for mothers and children at the station.<sup>176</sup>

In July 2023, the Towards Dialog Foundation published a report focusing on the situation of Roma displaced from Ukraine who stayed in the Podkarpackie Voivodship, where Przemyśl is situated.<sup>177</sup> The authors concluded that Roma had insufficient access to assistance and were – fully or partly – isolated from the support system offered to persons fleeing the war in Ukraine. Roma were offered lesser assistance in the reception centres, if they could access them at all. They were also discriminated at the border crossings and with regard to services like education, translation and transport. For months, mothers with children were sleeping on the ground at the Przemyśl railway station, despite the presence of national authorities and international organisations as well as in spite of the interventions of the Human Rights Commissioner. While the domestic authorities have not provided Roma with any or sufficient support, NGOs and Polish Roma community had to fill in the protection gap.<sup>178</sup>

In February 2024, the Towards Dialog Foundation indicated that the Roma who fled from Ukraine are still discriminated in Poland and their situation needs to be urgently improved by taking decisive actions by Polish authorities.<sup>179</sup>

Due to discrimination and lack of support in Poland, some Roma returned to Ukraine or moved to another EU state.<sup>180</sup>

The abovementioned problems of the Roma community continued in 2025. Moreover, the introduction of the 30-day registration deadline since March 2026 is expected to affect Roma more negatively than other temporary protection beneficiaries due to their frequent difficulties with obtaining travel documents.<sup>181</sup>

### *Human trafficking victims*

In April 2022, the Polish Human Rights Commissioner called for providing adequate protection to vulnerable persons displaced from Ukraine, inter alia, women and girls at risk of human trafficking. In July 2022, the Polish government answered that the protection of vulnerable persons from Ukraine is sufficient.<sup>182</sup>

The study of the Mixed Migration Centre (MMC) of June 2023 showed that “10% of respondents paid for smuggling services to enter Poland, (...). Most respondents who paid to leave Ukraine illegally arrived in Warsaw in the very first weeks of the crisis.” Moreover, “TCNs used those services less often than Ukrainians (2% vs. 8%), which could be explained by the absence of restrictions on TCNs leaving the

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Ukrainy’, 8 April and 13 July 2022, available in Polish [here](#). IOM Poland, ‘Experiences of Roma Refugees from Ukraine in Accessing Services and Assistance in Poland’, August 2024, available [here](#). K. Fiałkowska et al., Three years on - Ukrainian Roma experiences of displacement, transnational lives and resilience, CMR Spotlight no. 3(69), March 2025, available [here](#).

<sup>176</sup> Human Rights Commissioner, ‘Problemy uchodźców wojennych w Przemyślu. Odpowiedź wojewody na ponowne pismo Rzecznika’, 23 December 2022, 25 January, 5 July and 25 July 2023, available in Polish [here](#).

<sup>177</sup> Fundacja w Stronę Dialogu, ‘To nie są uchodźcy, tylko podróżnicy. Sytuacja romskich osób uchodźczych w województwie podkarpackim. Raport monitoringowy 2022-2023’, July 2023, available in Polish [here](#).

<sup>178</sup> For more see E. Mirga-Wójtowicz, K. Fiałkowska, M. Szewczyk, ‘National and local mobilisation of Roma and non-Roma organisations and activists in Poland supporting Ukrainian Roma forced migrants in the face of the war in Ukraine’, Fundacja Jaw Dikh, ERGO Network, November 2023, available in English [here](#).

<sup>179</sup> Fundacja w Stronę Dialogu, ‘Apel do polskich władz: Przestańcie traktować społeczność romską z Ukrainy jak uchodźców drugiej kategorii’, February 2024, available in Polish [here](#).

<sup>180</sup> Amnesty International, ‘Summary of the annual research project “Refugees from Ukraine in Poland”’, June 2023, available [here](#), 2.

<sup>181</sup> Council of Europe Directorate of human rights division on migration and refugees, *Report on the mission to Poland*, 4 – 5 February 2026, 1 April 2026, available [here](#), 8.

<sup>182</sup> Human Rights Commissioner, ‘Systemowo chronić grupy wrażliwe wśród uchodźców z Ukrainy. Odpowiedź pełnomocnika rządu ds. uchodźców z Ukrainy’, 8 April and 13 July 2022, available in Polish [here](#).

country, compared to Ukrainian nationals under Ukrainian martial law”. According to the MMC, this level of smuggling should be considered low and it confirms the effectiveness of the TPD.<sup>183</sup>

In June 2023, GRETA published its evaluation report on Poland,<sup>184</sup> with some remarks concerning human trafficking of Ukrainians seeking protection in Poland:

- ❖ “At the time of GRETA’s visit, no victims of THB had been identified among persons fleeing the war in Ukraine. In their comments to the draft report, the Polish authorities indicated that that five investigations had been initiated by the Police into alleged cases of human trafficking targeting Ukrainian refugees, but only one case was confirmed after investigation. It concerns two 17-year-old girls who were forced to provide sexual services. The proceedings are ongoing. No cases were reported by the Border Guard.”
- ❖ “Pursuant to the 2022 Law on Assistance to Refugees from Ukraine (Article 72), prison sentences have been temporally increased for committing or preparing the crime of THB during the armed conflict on the territory of Ukraine (10 to 25 years for committing the crime, and a minimum of one year for preparing the crime). The authorities indicated that this provision is not intended only to situations where the victims or the perpetrator are Ukrainians, nor to crimes committed in Ukraine.”
- ❖ “Measures have also been taken to alert persons fleeing the war in Ukraine, as well as the general public, on how to avoid human trafficking through posters and leaflets at border crossing points, reception centres, train stations, and city halls, and also through online information. The Police HQ prepared a leaflet in Ukrainian on human trafficking with information on suspicious conducts as well as contact details of the police hotline and email address. The Border Guard HQ cooperated with NGOs, such as the Lighthouse Foundation, to produce awareness-raising leaflets on human trafficking. The Ministry of the Interior and Administration distributed similar leaflets in Ukrainian, English and Polish (half a million copies). Numerous civil society organisations also developed and disseminated awareness-raising materials on human trafficking amongst Ukrainian refugees, such as La Strada Poland, A21 and the University of Warsaw, as well as international organisations (e.g. the European Union and UNHCR). Information alerts via SMS were also sent to all people crossing the border from Ukraine to Poland with information on potential threat of THB and possibilities of assistance.”

In October 2023, UNHCR commented on the limited number of human trafficking cases registered in Poland: "In light of reports on presumed victims of trafficking among refugees from Ukraine, who seek assistance and support of Ukrainian services upon their return from EU countries, the low number of disclosed trafficking cases may be the result of some existing barriers in referral mechanism, including lack of trust in the response services available and/or limited knowledge where one should seek assistance".<sup>185</sup>

Another study, published in November 2025, confirmed the low number of cases in which alleged victims of human trafficking were identified. Between 2022 and 2024, Border Guard registered only 2 Ukrainian nationals, Police – 23, Prosecutors’ Office – 77, and non-governmental organisation KCIK (National Intervention and Consultation Center for Polish and Foreign Victims of Human Trafficking) – 46. More Ukrainian nationals were recognised as potential human trafficking victims in the period 2016-2021 when their overall number in Poland was much smaller.<sup>186</sup>

According to the FRA report, published in 2026, comparing the situation of Ukrainian women in Poland, Germany and Czechia:

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<sup>183</sup> MMC, ‘Displaced from Ukraine to Warsaw A case study on journeys, living conditions, livelihoods and future intentions’, June 2023, available [here](#), 7-8.

<sup>184</sup> GRETA, ‘Evaluation Report: Poland. Access to justice and effective remedies for victims of trafficking in human beings’, 9 June 2023, available [here](#).

<sup>185</sup> UNHCR, ‘Poland: Joint Protection Analysis’, October 2023, available [here](#), 16-17.

<sup>186</sup> Monika Szulecka, Konsorcjum Migracyjne na zlecenie Międzynarodowej Organizacji ds. Migracji (IOM), ‘Ryzyko wyzysku w kontekście pracy i zakwaterowania migrantów w Polsce po 2022 r.’, 2025, available in Polish [here](#), 13-14.

More women in Poland had encountered potentially exploitative offers of any of the three types asked about in the survey – transport, housing or employment – with characteristics of trafficking in human beings (25 %) than in Germany (18 %) and Czechia (17 %). More women in Poland had received potentially exploitative offers of transport and housing with characteristics of trafficking in human beings than women surveyed in Czechia and Germany, whereas fewer women in Poland had encountered potentially exploitative offers of employment with characteristics of trafficking in human beings than women in Czechia and Germany.<sup>187</sup>

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<sup>187</sup> FRA, 'Seeking Safety from War: Violence and rights abuses against women from Ukraine', 2026, available [here](#).

## Content of Temporary Protection

### A. Status and residence

#### 1. Residence permit

##### Indicators: Residence permit

- |  |  |
|--|--|
| 1. What is the duration of residence permits granted to beneficiaries of temporary protection? | Duration of TP                           |
| 2. How many residence permits were valid in 2025 ?   | Special TP: 334,700<br>General TP: 1,428 |

#### Special temporary protection (until March 2026)

Under the Special Law, Ukrainian nationals and some of their family members (spouses and, from 1 July 2024, children) who entered Poland legally on or after 24 February 2022 due to the war in Ukraine, provided that they declared the intention to stay in Poland, were entitled to a legal stay in Poland until 4 March 2026. A child born in Poland to a mother enjoying special temporary protection in Poland, was legally staying in Poland too. Those rules respectively applied to closest family of a Ukrainian national who has a 'Pole's Card'.<sup>188</sup> Since March 2026, special temporary protection beneficiaries enjoy temporary protection under the Act on Protection (see below).

Until July 2022, Ukrainian nationals and some of their family members who were recognised as temporary protection beneficiaries in Poland were not given any residence permit, in violation of Article 8 of the TPD.<sup>189</sup>

In July 2022, the electronic document 'Diia.pl' was introduced and notified to the European Commission as a residence permit required under the TPD.<sup>190</sup> 'Diia.pl' was accessible via the mobile application 'mObywatel' only after the temporary protection beneficiary obtained the 'PESEL UKR' (see [Registration under temporary protection](#)).<sup>191</sup>

However, in 2022, children, in particular those under 13 years old, had difficulty with accessing the 'Diia.pl'. Persons excluded digitally struggled with this solution too.<sup>192</sup> Only since June 2023, some access to 'Diia.pl' has been enabled to some children (through their parents' mobile application).<sup>193</sup> In 2025, 60,050 children were issued such a document.<sup>194</sup> However, still not all children, e.g. unaccompanied or

<sup>188</sup> Article 2(1-2) of the Special Law, repealed in March 2026.

<sup>189</sup> Commissioner for Human Rights, 'Trudności uchodźców przy ponownym wjeździe do Polski po powrocie do Ukrainy. Odpowiedź MSWiA', 22 August 2022, available [here](#). SIP, *Letter of 30 November 2022 to the European Commission*, available in English [here](#), 3; HFHR, 'Opinion of the Helsinki Foundation for Human Rights on Incompliance of Certain National Regulations Concerning Temporary Protection with Relevant Provisions of the European Union Law', 15 July 2022, available [here](#), 3-4.

<sup>190</sup> Ministry of Internal Affairs and Administration, 'Diia.pl – elektroniczny dokument dla uchodźców wojennych z Ukrainy', 22 July 2022, available in Polish [here](#). See also European Commission. Update of the list of residence permits referred to in Article 2(16) of Regulation (EU) 2016/399 of the European Parliament and of the Council on a Union Code on the rules governing the movement of persons across borders (Schengen Borders Code). 2022/C 304/05.

<sup>191</sup> Article 10 of the Special Law, repealed in March 2026.

<sup>192</sup> SIP, *Letter to the Polish Parliament*, 9 December 2022, available in Polish [here](#), 16; Human Rights Commissioner, 'Aplikacja potwierdzająca status uchodźcy z Ukrainy nie dla osób poniżej 13. roku życia. Marcin Wiącek pisze do MSWiA', 24 March 2023, available in Polish [here](#). ACAPS, 'Poland: Loss of temporary protection status and social benefits for Ukrainian refugees', 14 November 2023, available [here](#). SIP, 'SIP w działaniu. Raport z działalności Stowarzyszenia Interwencji Prawnej w 2022 r.', September 2023, available in Polish [here](#), 11. Fundacja Ukraiński Dom, *Biuletyn Domu Ukraińskiego nr 1-2*, April 2024, available in Polish [here](#), 3. Human Rights Commissioner, 'Problemy ze statusem UKR uchodźców wojennych z Ukrainy. Odpowiedź MSWiA', 4 July and 26 August 2024, available in Polish [here](#).

<sup>193</sup> Article 10(1a-1d) of the Special Law, in force from 5 June 2023 until 4 March 2026. See also Digital Affairs Ministry, 'Diia.pl dla dzieci w aplikacji mObywatel', 5 June 2023, available in Polish [here](#).

<sup>194</sup> Information provided by the Ministry of Digital Affairs, 2 March 2026.

separated from their parents, can receive this document, in violation of TPD.<sup>195</sup> Moreover, if a child's parent is granted a temporary residence permit (see [Access to asylum and other legal statuses](#)), the access to child's Diia.pl – even though they are still a temporary protection beneficiary – is taken away.<sup>196</sup>

If a person concerned lost the 'PESEL UKR', 'Diia.pl' was invalidated.<sup>197</sup> In particular, a temporary protection beneficiary lost their status upon being absent from Poland for 30 days.<sup>198</sup> Since 28 January 2023, the status was also lost if a person concerned enjoyed (and since September 2025, was granted) temporary protection in another EU Member State<sup>199</sup> (see [Movement and Mobility](#)).

In 2022, approx. 1,502,620 persons were given 'PESEL UKR' in Poland. However, as of 31 December 2022, only approx. 288,850 temporary protection beneficiaries had access to 'Diia.pl', and another 215,432 persons did not instal 'Diia.pl' despite having this possibility.<sup>200</sup> At the end of 2025, only 334,700 of 967,890 special temporary protection beneficiaries had access to 'Diia.pl'.<sup>201</sup>

Only since 28 January 2023, the Special Law clearly stated that 'Diia.pl', with a travel document, entitled its holder to travel without a visa.<sup>202</sup> It was the only right directly associated with this residence permit. Some of the rights of the temporary protection beneficiaries were conditioned upon obtaining the 'PESEL UKR', e.g. rights to run a business (Article 23(2) of the Special Law, see [Access to labour market](#)), to continue with accommodation organised by Polish authorities beyond 120 days (Article 12(17a), from 1 March 2023 to 31 October 2025, see [Housing](#)), and to some financial allowances and social aid (Articles 26(3) and 29(1) of the Special Law, see [Social Welfare](#)). Access to medical assistance was also facilitated by obtaining 'PESEL UKR' (Article 37(1a) of the Special Law, see [Health care](#)).

### **General temporary protection (until March 2026)**

Under Article 110(5) of the Act on Protection, temporary protection beneficiaries<sup>203</sup> received, upon request, a certificate confirming that they enjoy temporary protection in Poland. It was free of charge and valid for a duration of temporary protection (it was prolonged by law with every extension of temporary protection in the EU). Thus, the certificates' validity was automatically prolonged until 4 March 2027.<sup>204</sup>

By law, the certificate was invalidated if its holder:

- a. received a decision refusing them temporary protection due to national security considerations; or
- b. moved to another EU Member State under the right to family reunification; or
- c. received a residence permit for temporary protection beneficiaries in another EU Member State (since 28 January 2023); or
- d. was not entitled to receive that certificate (since 1 July 2024); or
- e. informed in writing that they no longer wished to enjoy general temporary protection in Poland (since 1 July 2024).

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<sup>195</sup> M. Łysienia, 'Following the EU Response to the Russian Invasion of Ukraine? The Implementation of the Temporary Protection Directive in Poland', CEEMR vol. 12 no. 1, 2023, available [here](#), 189. Human Rights Commissioner, 'Problemy ze statusem UKR uchodźców wojennych z Ukrainy. Odpowiedź MSWiA', 4 July and 26 August 2024, available in Polish [here](#).

<sup>196</sup> Human Rights Commissioner, 'Problemy ze statusem UKR uchodźców wojennych z Ukrainy. Odpowiedź MSWiA', 4 July and 26 August 2024, available in Polish [here](#).

<sup>197</sup> However, the respective rules in this regard were only introduced by the amendment of the Special Law of 13 January 2023.

<sup>198</sup> Article 11(2) of the Special Law repealed in March 2026.

<sup>199</sup> Article 11(4) of the Special Law.

<sup>200</sup> Information provided by the Ministry of Digital Affairs, 1 March 2023.

<sup>201</sup> Information provided by the Ministry of Digital Affairs, 2 March 2026.

<sup>202</sup> Article 10(7) of the Special Law repealed in March 2026.

<sup>203</sup> From 28 January 2023 until 4 March 2026, the Act in Protection, in Article 110(7a), provided for a right to this certificate for a child of a temporary protection beneficiary born in Poland.

<sup>204</sup> Office for Foreigners, 'Przedłużenie obowiązywania zaświadczeń o objęciu ochroną czasową do 4 marca 2027 r.', 13 August 2025, available in Polish [here](#).

After the invalidation, the person concerned should leave Poland in 30 days.<sup>205</sup> However, no certificate was invalidated in 2022 and 2023 on these grounds.<sup>206</sup> In 2024, 6 certificates were invalidated, including in three cases of children who obtained Ukrainian citizenship.<sup>207</sup> Data for 2025 is unavailable.

This certificate was the only proof of being recognised as a general temporary protection beneficiary in Poland. It also confirmed the beneficiaries' right to stay in Poland. In July 2022, it was notified to the European Commission as a residence permit required under Article 8 of the TPD.<sup>208</sup> However, it has been contested whether it can be a residence permit within this meaning.<sup>209</sup>

From 28 January 2023 until 4 March 2026, the Act on Protection clearly stated that this certificate, with a travel document, entitles its holder to travel without a visa. Moreover, access to medical assistance, as well as accommodation and food (or financial allowance), was conditioned upon obtaining this certificate (see [Social welfare](#) and [Health care](#)).<sup>210</sup>

Until 25 January 2023, submitting an application for a certificate to be issued, was not necessary. A person concerned could orally inform the Office for Foreigners that they are a temporary protection beneficiary (see [Registration for temporary protection](#)).<sup>211</sup> Since 25 January 2023, the application for the issuance of the certificate had to be submitted in writing: in person in the Office for Foreigners, sent by letter or submitted online.<sup>212</sup> Copies of the required documents should be submitted with the application; the originals are expected to be presented in the Office for Foreigners before the certificate's collection.<sup>213</sup>

Certificates for general temporary protection beneficiaries				
	2022	2023	2024	2025
Number of persons who received a new certificate	1,301	118	47	25
Number of beneficiaries with a valid certificate at the end of the year	1,240	-	1,313	1,428

Based on the information provided by the Office for Foreigners, 17 January 2023, January and February 2024, 14 and 28 March 2025 and 10 April 2026. Data updated by the Office for Foreigners in 2025.<sup>214</sup>

## Merged temporary protection (since March 2026)

### New rules

<sup>205</sup> Article 110(12) of the Act on Protection, added in May 2024, in force from 1 July 2024 until 4 March 2026.

<sup>206</sup> Information from the Office for Foreigners, 17 January 2023.

<sup>207</sup> Information from the Office for Foreigners, 14 March 2025.

<sup>208</sup> European Commission. *Update of the list of residence permits referred to in Article 2(16) of Regulation (EU) 2016/399 of the European Parliament and of the Council on a Union Code on the rules governing the movement of persons across borders (Schengen Borders Code)*. 2022/C 304/05.

<sup>209</sup> HFHR, 'Opinion of the Helsinki Foundation for Human Rights on Incompliance of Certain National Regulations Concerning Temporary Protection with Relevant Provisions of the European Union Law', 15 July 2022, available [here](#), 4.

<sup>210</sup> Article 112(1) and (9) of the Act of Protection, repealed in March 2026.

<sup>211</sup> Office for Foreigners, 'Dodatkowe miejsca wydawania zaświadczeń o ochronie czasowej', 13 May 2022, available in Polish [here](#).

<sup>212</sup> Office for Foreigners, 'Zmiana zasad wydawania zaświadczeń o ochronie czasowej', 18 January 2023, available in Polish [here](#).

<sup>213</sup> Information from the Office for Foreigners, 17 January 2023, and published by the Office online [here](#).

<sup>214</sup> The previous AIDA reports, in accordance with the information previously given by the Office for Foreigners, stated that at the end of 2023, there was 1,343 valid certificates. However, in 2025, the Office for Foreigners explained that this number concerns a total number of certificates issued in 2022-2023, not the number of valid certificates at the end of 2023. This is, however, not compatible with the annual data they shared concerning new certificates. Accordingly, the number of valid certificates at the end of 2023 is unknown. In 2025, the Office for Foreigners also informed that at the end of 2022 there was 1,240 valid certificates rather than 1,224.

Since 5 March 2026, all temporary protection beneficiaries are entitled to apply for 'PESEL UKR' and have access to 'Diia.pl'.

Temporary protection expires if a beneficiary:

- a. has not applied for 'PESEL UKR' within 30 days from crossing the Polish border;
- b. left Poland for more than 30 days;
- c. informed that they no longer wish to enjoy temporary protection in Poland;
- d. received temporary residence permit, permanent residence permit, EU long-term residence permit, international protection, tolerated stay, or humanitarian stay;
- e. applied for asylum;
- f. was granted temporary protection in another Member State;
- g. obtained Polish or EU Member State citizenship.<sup>215</sup>

### Transitional provisions

Electronic documents 'Diia.pl' issued before March 2026 remained valid.<sup>216</sup>

Certificates confirming that a person concerned enjoyed temporary protection in Poland issued before March 2026 remained valid until 4 March 2027, unless this person received 'PESEL UKR' or the certificate was invalidated.<sup>217</sup> The Office for Foreigners reported that no certificates confirming enjoying temporary protection will be issued starting from 5 March 2026. Thus, if the certificate is lost or destroyed, a person concerned must apply for 'PESEL UKR'.<sup>218</sup>

## 2. Access to asylum and other legal statuses

### Access to asylum

#### ❖ Ukrainian nationals

The number of asylum applications of Ukrainian nationals significantly increased in 2024 and 2025 (see table below). This increase resulted from diverse reasons, including the protracted legislative process concerning the extension of temporary protection in Poland, the postponement of the activation of the rules on granting temporary residence permits (the so-called 'CUKR' card, see below) to temporary protection beneficiaries, as well as lack of access to travel documents by some Ukrainians (now required to apply for the 'PESEL UKR').<sup>219</sup>

Asylum proceedings concerning Ukrainian nationals: 2022-2025					
	Applications	Granted subsidiary protection	Granted refugee status	Refused international protection	Recognition rate according to the OfF
2022	1,778	962	3	33	Lack of data
2023	1,770	1,126	15	88	93%
2024	7,054	3,901	5	91	98%
2025	7,008	1,518	6	2,847	Lack of data

Based on the Information provided by the Office for Foreigners, 16 February 2024 and 19 February 2025 and the data for 2025 available [here](#).

<sup>215</sup> Article 109b of the Act on Protection, in force since 5 March 2026.

<sup>216</sup> Article 24(1)<sub>(4)</sub> of the Phasing-Out Law.

<sup>217</sup> Article 20(1) of the Phasing-Out Law.

<sup>218</sup> Office for Foreigners, 'Zaprzestanie wydawania zaświadczeń potwierdzających korzystanie z ochrony czasowej', 9 March 2026, available in Polish [here](#).

<sup>219</sup> CPPHN, 'Ochrona uzupełniająca lub ochrona czasowa – postępowania ochronne obywateli Ukrainy', 3 October 2025, available in Polish [here](#).

In years 2022-2024, predominantly positive international protection decisions concerning Ukrainian nationals were mostly based on a serious and individual threat posed to civilians' life or safety due to the indiscriminate violence stemming from the ongoing armed conflict in Ukraine.<sup>220</sup> In March 2025, the Office for Foreigners stated that many Ukrainian nationals treat asylum proceedings as a quick way to legalise their stay in Poland which constitutes an abuse of the international protection system. Moreover, according to the the Office, many of the applicants are men who fear military service in Ukraine which is not a reason to be granted international protection in Poland. Furthermore, the Office stated that the security situation in Ukraine had improved since 2022. Accordingly, now, all asylum applicants from Ukraine were to be interviewed as regards their individual reasons to seek protection in Poland.<sup>221</sup> In September 2025, the Office for Foreigners repeated its position and reported over 1,000 negative decisions concerning Ukrainian nationals issued in 2025.<sup>222</sup> In total, in 2025, 2,847 Ukrainian nationals were refused international protection compared to 1,524 who were granted international protection.

According to the Refugee Board, in 2025, 775 Ukrainian nationals appealed against first-instance decisions on international protection. The Refugee Board issued 294 decisions concerning Ukrainian nationals in 2025, including 181 upholding the rejection of the asylum application, 14 annulling the decision and directing the proceedings back to the Office for Foreigners and 45 discontinuing the proceedings.<sup>223</sup> Data published by the Office for Foreigners, however, show that 1,067 appeals were submitted by Ukrainian nationals in 2025. One person received subsidiary protection, in the cases of 23 Ukrainians the first-instance decision was annulled and was reconsidered by the Office for Foreigners, in the case of 234 Ukrainian nationals the rejection of the asylum application was upheld and in case of 68 Ukrainian nationals the proceedings were discontinued.<sup>224</sup>

In 2022, the Supreme Administrative Court concluded that the war in Ukraine must be taken into account in the court proceedings concerning asylum applications registered before the beginning of the war. The court relied on Article 46 of the Procedures Directive and Article 47 of the Charter of Fundamental Rights.<sup>225</sup> This approach continued in 2023-2025.

In 2025, several judgments of the Supreme Administrative Court considered refusals to perform military service. The court stated that it could lead to granting international protection only if there is a high risk that the person concerned would be required to perform military service, performing this service would include crimes or acts falling within the scope of the grounds for exclusion, they would be prosecuted or punished for refusing to perform this service with sufficiently serious punishment and had no legal possibility to avoid military service. All these conditions must be interpreted restrictively.<sup>226</sup>

In March 2025, the Office for Foreigners anticipated that – due to the increased number of asylum applications submitted by Ukrainian nationals in 2024 – the respective proceedings will last approx. 15 months.<sup>227</sup> At the end of 2025, 4,186 cases concerning asylum applications of Ukrainian nationals were still pending before the Office for Foreigners.<sup>228</sup>

#### ❖ Non-Ukrainian asylum seekers from Ukraine

<sup>220</sup> SIP, 'Subsidiary protection for Ukrainian citizens', 24 August 2022, available [here](#).

<sup>221</sup> Office for Foreigners, 'Postępowania ws. ochrony międzynarodowej dotyczące obywateli Ukrainy', 10 March 2025, available in Polish [here](#).

<sup>222</sup> Office for Foreigners, 'Komunikat ws. postępowań o udzielenie ochrony międzynarodowej obywatelom Ukrainy', 2 September 2025, available in Polish [here](#).

<sup>223</sup> Information from the Refugee Board, 19 January 2026.

<sup>224</sup> Data for 2025 published by the Office for Foreigners, available [here](#).

<sup>225</sup> Naczelny Sąd Administracyjny, judgment of 5 July 2022, no. II OSK 1753/21, see also SIP, 'SIP w działaniu. Raport z działalności Stowarzyszenia Interwencji Prawnej w 2022 r.', September 2023, available in Polish [here](#), 14-15.

<sup>226</sup> Naczelny Sąd Administracyjny, judgment of 14 May 2025, no. II OSK 2684/24 (concerning a Russian national); Naczelny Sąd Administracyjny, judgment of 17 September 2025, no. II OSK 2717/24 (concerning an Armenian national).

<sup>227</sup> Office for Foreigners, 'Postępowania ws. ochrony międzynarodowej dotyczące obywateli Ukrainy', 10 March 2025, available in Polish [here](#).

<sup>228</sup> Information provided by the Office for Foreigners, 10 April 2026.

It is unknown how many non-Ukrainian third-country nationals who came to Poland from Ukraine due to the war sought asylum in Poland but did not qualify for temporary protection. However, such cases have been reported in practice. For example, in 2023, SIP reported of a Russian national of Chechen origin who had a permanent stay in Ukraine, but was not present in Ukraine on 24 February 2022, so was not eligible for temporary protection in Poland. She applied for international protection instead. The Office for Foreigners concluded that her return to Russia after 20 years of stay in Ukraine, given her critical approach to Russian invasion in Ukraine, would be an inhuman treatment.<sup>229</sup>

### *Asylum and temporary protection*

Temporary protection and international protection were exclusive for most of the beneficiaries until 4 March 2026 and for all since 5 March 2026.

#### ❖ Until 5 March 2026

Under the Special Law, Ukrainian nationals and their family members who applied for international protection in Poland, as well as Ukrainian nationals recognised in Poland as refugees and subsidiary protection beneficiaries, could not enjoy temporary protection at the same time.<sup>230</sup> However, a Ukrainian national or their family member could withdraw their asylum application and again be eligible for temporary protection.<sup>231</sup>

Meanwhile, the Act on Protection did not preclude seeking international protection by prospective and recognised temporary protection beneficiaries under a general mechanism.<sup>232</sup> Article 112(1b) of the Act, indirectly confirmed that the conjuncture of asylum proceedings and temporary protection is possible. Under this provision, medical assistance as well as accommodation and food (or financial allowance) for temporary protection beneficiaries was not provided if a person concerned benefited from material reception conditions for asylum seekers. However, in practice, especially in the first years of war, some general temporary protection beneficiaries have been denied access to asylum in Poland. If a general temporary protection beneficiary applies for international protection, general rules concerning asylum proceedings are applicable (see [General report](#)).

#### ❖ Since March 2026

Since 5 March 2026, temporary protection expires in case of seeking asylum by all beneficiaries. Temporary protection is, however, reinstated *ex officio* if international protection is not granted.<sup>233</sup> Recognized refugees and subsidiary protection beneficiaries cannot benefit from temporary protection.<sup>234</sup>

When temporary protection ends, its beneficiaries will have the possibility to apply for international protection in Poland.

### *Further legalisation of stay*

## **Special temporary protection (until March 2026)**

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<sup>229</sup> SIP, 'Ochrona uzupełniająca dla Czechenki mającej pobyt stały w Ukrainie', 21 July 2023, available in Polish [here](#).

<sup>230</sup> Article 2(3) of the Special Law, repealed in March 2026.

<sup>231</sup> Article 2(5) of the Special Law, repealed in March 2026.

<sup>232</sup> Critically towards this solution, M. Kosiel-Pająk, P. Sadowski, 'British and Polish Temporary Protection Schemes Addressing Displaced Persons from Ukraine', *Časopis pro právní vědu a praxi* nr 4/2023, [here](#) 906-907.

<sup>233</sup> Article 109b of the Act on Protection, in force since 5 March 2026.

<sup>234</sup> Article 109a(1)(d-e) of the Act on Protection, in force since 5 March 2026.

According to general rules, temporary protection beneficiaries cannot apply for a temporary residence permit or a EU long-term residence permit.<sup>235</sup> However, some special rules have been introduced aimed at enabling access to some temporary residence permits to Ukrainian nationals and their family members.

In January 2023, a facilitated possibility to apply for a six-month or one-year temporary residence permit was introduced for Ukrainian nationals. Such residence permits could be issued until 4 March 2026 and only once per person (Article 42a of the Special Law). In 2024, 19,470 and in 2025 23,471 Ukrainian nationals received a residence permit in a facilitated manner under this provision.<sup>236</sup>

Moreover, from 1 April 2023 until 4 March 2026, special temporary protection beneficiaries could apply in a facilitated manner for a temporary residence permit related to their work or business in Poland (Article 42(13-19) of the Special Law). From 1 July 2024 until 4 March 2026, Ukrainian nationals having 'PESEL UKR' could also receive a temporary residence permit in a facilitated manner based on their family relations in Poland (Article 42(13) and (13a) of the Special Law, as amended in May 2024).<sup>237</sup>

Importantly, in each case, receiving a temporary residence permit led to cessation of temporary protection in Poland.

### **General temporary protection (until March 2026)**

According to general rules, temporary protection beneficiaries could not apply for a temporary residence permit or a EU long-term residence permit.<sup>238</sup> No special rules have been introduced since 2022 that would have been aimed at enabling access to these residence permits to general temporary protection beneficiaries.

### **Merged temporary protection (since March 2026)**

Since March 2026, all temporary protection beneficiaries having 'PESEL UKR' can apply for a temporary residence permit based on their work, business or family relations in Poland.<sup>239</sup>

Additionally, Articles 42c-42x, added by the Special Law amendment of 15 May 2024 but applicable only from 4 May 2026,<sup>240</sup> provide for the right of a temporary protection beneficiary to receive a residence card (the so-called CUKR) if they had a 'PESEL UKR' on 4 June 2025, continue to have this number on the day of applying for a residence card and have stayed in Poland for at least 365 days. Accordingly, the CUKR card can be given only to Ukrainian nationals and some of their family members, not all temporary protection beneficiaries. The card is to be valid for 3 years and is to be understood as being a temporary residence permit in Poland. It will allow work without a work permit and a notification obligation, and running a business in Poland; however, the person concerned must inform the authorities of every change of their place of stay.<sup>241</sup> While it has been considered commendable that Poland offered the CUKR card to Ukrainian nationals, it has been also noticed that not all temporary protection beneficiaries will receive it, most probably leaving some of them in legal limbo starting from March 2027.<sup>242</sup> Moreover, already in 2025, some unfair practices with regard to obtaining the CUKR card were reported by the Office for Foreigners.<sup>243</sup>

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<sup>235</sup> Article 99(1)<sub>(4)</sub> and Article 213(1)<sub>(1)e</sub> of the Act on Foreigners.

<sup>236</sup> Information from the Office for Foreigners, 14 March 2025 and 10 April 2026.

<sup>237</sup> Before, the law concerning access to a temporary residence permit for Ukrainian workers and persons running a business was criticised due to the lack of such a possibility for their children/ see Migration Consortium, Right to Protection, Letter of 24 August 2023, available in Polish and English [here](#), 4.

<sup>238</sup> Article 99(1)<sub>(4)</sub> and Article 213(1)<sub>(1)e</sub> of the Act on Foreigners.

<sup>239</sup> Article 45 of the Phasing-Out Law.

<sup>240</sup> Office for Foreigners, 'Informacja o dacie uruchomienia systemu teleinformatycznego MOS', 10 April 2026, available in Polish [here](#).

<sup>241</sup> Detailed rules are available here: Office for Foreigners, 'Karty pobytu dla obywateli Ukrainy posiadających PESEL UKR', 21 November 2025, in Polish [here](#).

<sup>242</sup> See e.g. Council of Europe Directorate of human rights division on migration and refugees, *Report on the mission to Poland*, 4 – 5 February 2026, 1 April 2026, available [here](#), 7.

<sup>243</sup> Office for Foreigners, 'Nieuczciwe praktyki dotyczące uzyskania tzw. kart pobytu CUKR', 29 October 2025, available in Polish [here](#).

As of April 2026, Poland offers no funding or other support for temporary protection beneficiaries wanting to return to Ukraine.

## B. Family reunification

### Special temporary protection (until March 2026)

Contrary to Article 15 of the Temporary Protection Directive, there was no right to family reunification under the Special Law.<sup>244</sup> Ukrainian nationals could not apply for family reunification with their family members neither staying in another EU Member State nor in Ukraine. Accordingly, there was also no appeal concerning denial of family reunification provided for in law, in violation of Article 29 TPD.<sup>245</sup> The calls of NGOs for the right to family reunification to be guaranteed in the Polish law for Ukrainian nationals fleeing the war in their country have been ignored.<sup>246</sup>

### General temporary protection (until March 2026)

The Act on Protection provides for a right to family reunification for temporary protection beneficiaries. Under Article 117(1), if a spouse or a child of this beneficiary stays outside Poland, the Head of the Office for Foreigners takes actions to reunite the family. The Head of the Office for Foreigners may take those actions in regard to other close relatives who directly before coming to Poland lived together as part of the family unit, and who were wholly or mainly dependent on the temporary protection beneficiary (Article 117(2) of the Act on Protection). However, the actions that the Head of the Office is supposed to be taking are not specified in law.

The Head of the Office for Foreigners may also apply to another EU Member State asking for the temporary protection beneficiaries' transfer to that state in order to reunite a family therein. Such a transfer is realised only upon consent of the beneficiary (Articles 117a-117b of the Act on Protection).

The rules as regards family reunification provided for in the Act on Protection are insufficient. In particular, there are no rules concerning: the initiation of the family reunification proceedings, the documents that have to be submitted (e.g. concerning family ties), the form and time limits for the decision that is made by the Head of the Office for Foreigners, and appeal proceedings (the latter is against Article 29 TPD<sup>247</sup>). The lack of procedural rules in this regard may make the right to family reunification illusory.<sup>248</sup> This conclusion is indirectly confirmed by the information provided by the Office for Foreigners. In 2022-2024, no applications for family reunification were submitted to the Office for Foreigners and no temporary protection beneficiary was reunited with their family.<sup>249</sup>

### Merged temporary protection (since March 2026)

Articles 117-117b of the Act of Protection – described above with regard to general temporary protection – apply now to all temporary protection beneficiaries.

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<sup>244</sup> SIP, *Letter of 30 November 2022 to the European Commission*, available in English [here](#), 6; HFHR, 'Opinion of the Helsinki Foundation for Human Rights on Incompliance of Certain National Regulations Concerning Temporary Protection with Relevant Provisions of the European Union Law', 15 July 2022, available [here](#), 7; M. Łysienia, 'Following the EU Response to the Russian Invasion of Ukraine? The Implementation of the Temporary Protection Directive in Poland', CEEMR vol. 12 no. 1, 2023, available [here](#), 191.

<sup>245</sup> M. Łysienia, 'Following the EU Response to the Russian Invasion of Ukraine? The Implementation of the Temporary Protection Directive in Poland', CEEMR vol. 12 no. 1, 2023, available [here](#), 193.

<sup>246</sup> See e.g. SIP, *Letter to the Polish Parliament*, 9 December 2022, available in Polish [here](#), 20.

<sup>247</sup> M. Łysienia, 'Following the EU Response to the Russian Invasion of Ukraine? The Implementation of the Temporary Protection Directive in Poland', CEEMR vol. 12 no. 1, 2023, available [here](#), 193.

<sup>248</sup> SIP, *Input to the EUAA Asylum Report 2023*, February 2023, available in English [here](#), 15.

<sup>249</sup> Information provided by the Office for Foreigners, 17 January 2023, February 2024 and 14 March 2025.

## C. Movement and mobility

### *Movement within Poland*

Temporary protection beneficiaries – both under the Special Law and the Act on Protection – have freedom of movement within Poland. Until March 2026, the same minor limitations that apply to asylum seekers (see [Reception, Freedom of movement](#)) also applied to the beneficiaries of temporary protection who were accommodated in the reception centres (only 6 persons in 2022, 10 in 2023, one in 2024, and none in 2025, see [Housing](#)).

### *Movement to other EU Member States*

#### **Special temporary protection (until March 2026)**

In the first months upon the beginning of the war in Ukraine, travel to other EU Member States was hampered by the fact that Ukrainian nationals and their family members enjoying special temporary protection in Poland had no access to a residence permit (see [Residence permit](#)).<sup>250</sup> Only in July 2022, the electronic document ‘Diia.pl’ was introduced and notified to the European Commission. Moreover, only since 28 January 2023, the Special Law clearly states that ‘Diia.pl’, with a travel document, entitles its holder to multiple travels without a visa.<sup>251</sup>

Upon the change of the Special Law in January 2023, temporary protection ceased if a beneficiary enjoyed temporary protection in another EU Member State (Article 11(4)). In those circumstances, their ‘PESEL UKR’ was withdrawn.<sup>252</sup> In September 2025 the wording of the respective provision was changed from “enjoying” to “being granted temporary protection”<sup>253</sup> indicating a stricter policy in this regard. The change, according to the government, was based on the CJEU’s judgment in case C-753/23. In 2025, 2,929 special temporary protection beneficiaries lost PESEL UKR due to the fact that they enjoyed or were granted temporary protection in another EU Member State.<sup>254</sup>

Moreover, a temporary protection beneficiaries lost their status (‘PESEL UKR’) upon the 30-day absence in Poland.<sup>255</sup> This rule applied to all absences in Poland, so also to travels to other EU Member States. It has been considered against the EU law (as an unjustified limitation to a right to free movement within the EU).<sup>256</sup> If a temporary protection beneficiary departed from Poland for a longer period than 30 days via an internal border of the EU, they could inform the respective authorities about this departure, including where and when they were going. Upon such notification, the ‘PESEL UKR’ was withdrawn.<sup>257</sup> Such a withdrawal was reported in 2022 in approx. 4,000 cases, in 2023 in 13,790 cases, in 2024 in 11,010 cases and in 2025 in 7,513 cases.<sup>258</sup>

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<sup>250</sup> HFHR, ‘Opinion of the Helsinki Foundation for Human Rights on Incompliance of Certain National Regulations Concerning Temporary Protection with Relevant Provisions of the European Union Law’, 15 July 2022, available [here](#), 4; SIP, ‘SIP w działaniu. Raport z działalności Stowarzyszenia Interwencji Prawnej w 2022 r.’, September 2023, available in Polish [here](#), 11-12.

<sup>251</sup> Article 10(7) of the Special Law, repealed since March 2026.

<sup>252</sup> Article 11(4) in conjunction with Article 4(17a)(4) of the Special Law, repealed since March 2026. The Special Law amendment dated 13 January 2023 also stated that Ukrainian nationals who were registered as temporary protection beneficiaries in Poland, but were granted temporary protection in another EU Member State as of 28 January 2023, lost their temporary protection in Poland on the same date.

<sup>253</sup> The Special Law Amendment of 12 September 2025, available in Polish [here](#).

<sup>254</sup> Information provided by the Ministry of Digital Affairs, 2 March 2026.

<sup>255</sup> Article 11(2) in conjunction with Article 4(17a)(1) of the Special Law, repealed since March 2026. Before 28 January 2023, it was ‘one month’.

<sup>256</sup> HFHR, ‘Opinion of the Helsinki Foundation for Human Rights on Incompliance of Certain National Regulations Concerning Temporary Protection with Relevant Provisions of the European Union Law’, 15 July 2022, available [here](#), 5. See also ECRE, ‘Movement to and From Ukraine Under the Temporary Protection Directive’, January 2023, available [here](#), 2, where this rule was considered to be at odds with the spirit of the TPD.

<sup>257</sup> Article 4(17c-17d) of the Special Law, repealed since March 2026.

<sup>258</sup> Information provided by the Ministry of Digital Affairs, 1 March 2023, 9 April 2024, 20 March 2025 and 2 March 2026.

If a person concerned confirmed that their absence in Poland was no longer than 30 days, the 'PESEL UKR' should ("may" until 1 July 2024) have been restored.<sup>259</sup> If a person concerned lost temporary protection due to the fact that they enjoyed this protection in another EU Member State or due to the over 30-day absence in Poland, the 'PESEL UKR' might have been re-granted, if a person came back to Poland due to the war in Ukraine. However, difficulties with having the 'PESEL UKR' restored or re-granted were reported (see below, [Movement to and from Ukraine](#)).

Temporary protection beneficiaries in other Member States who subsequently wanted to benefit from temporary protection in Poland struggled with accessing this protection upon arrival to Poland (see [Qualification for temporary protection in the AIDA report annex on 2024](#)).

In 2024, EWL reported that many Ukrainian nationals who had temporary protection in Poland decided to move to Germany. The reasons for the move were: recommendations from the family and friends already living in Germany, better social assistance, better remunerations and greater possibility to save some money. In Germany, Ukrainian nationals were offered German language lessons. 59% of respondents were not employed in Poland before moving to Germany. 35% of them declared that they want to stay in Germany, almost half were undecided whether they will go back to Poland.<sup>260</sup>

### **General temporary protection (until March 2026)**

Only in July 2022, the certificate for temporary protection beneficiaries issued under the Act on Protection was notified to the European Commission (see [Residence permit](#)). Beforehand, general temporary protection beneficiaries could have faced issues while travelling to another country.

From 28 January 2023, a temporary protection beneficiary lost their status in Poland if they received a residence permit based on Article 8(1) TPD in another EU Member State. In those circumstances, their certificate was invalidated.<sup>261</sup> Re-granting temporary protection after invalidating the certificate for temporary protection beneficiaries was not regulated in the Act on Protection. There is no available information concerning the practice in this regard.

### **Merged temporary protection (since March 2026)**

Since 5 March 2026, all temporary protection beneficiaries receive 'PESEL UKR'. 'Diia.pl' entitles them – with a valid passport – to cross the border.<sup>262</sup> If a beneficiary leaves Poland via EU internal borders, they can inform the respective authorities about this departure, including where and when they are going. Upon such notification, the 'PESEL UKR' is withdrawn.<sup>263</sup> The 'PESEL UKR' may be re-granted upon request.<sup>264</sup> Being granted temporary protection in another EU Member State also leads to withdrawing 'PESEL UKR'.<sup>265</sup> Leaving Poland for more than 30 days entails the expiration of temporary protection.<sup>266</sup>

### *Movement to and from Ukraine*

### **Special temporary protection (until March 2026)**

Movement to and from Ukraine was hampered in 2022-2025. Border Guard denied entry to thousands of persons crossing the Polish-Ukrainian border (see [Admission to territory](#)). These decisions concerned both first-time entrants and recognised temporary protection beneficiaries. With regard to the latter, those

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<sup>259</sup> Article 4(17b) of the Special Law, repealed since March 2026.

<sup>260</sup> EWL, 'Z Polski do Niemiec. Nowe trendy ukraińskiej migracji uchodźczej', September 2023, available in Polish [here](#).

<sup>261</sup> Article 110(10-11) of the Act on Protection, repealed since March 2026.

<sup>262</sup> Article 110d (9) of the Act on Protection, in force since 5 March 2026.

<sup>263</sup> Article 44a (23-25) of the Population Registry Law, in force since 5 March 2026.

<sup>264</sup> Article 44b (1) of the Population Registry Law, in force since 5 March 2026.

<sup>265</sup> Article 110f (1) in conjunction with Article 109a (3) of the Act on Protection, in force since 5 March 2026.

<sup>266</sup> Article 109b of the Act on Protection, in force since 5 March 2026.

difficulties resulted from the unfavourable practice of the Border Guard and the incorrect implementation of the TPD in Poland.<sup>267</sup>

- ❖ Until July 2022, Ukrainian nationals and their family members who were recognised as special temporary protection beneficiaries were not given any residence permit, in violation of Article 8 of the TPD (see [Residence permit](#)). In consequence, if they returned temporarily to Ukraine and then again tried to enter Poland, they might have been requested at the Polish border for a visa or a residence permit and/or their right to visa-free movement in the EU was checked. Thus, some temporary protection beneficiaries who had exhausted their right to a visa-free stay in the EU and had not a valid visa were denied entry to Poland despite their temporary protection status therein. They had no residence permit to show at the border checkpoint that would confirm their status and entitle them to re-enter Poland.<sup>268</sup>
- ❖ In July 2022, the electronic document 'Diia.pl' was introduced and notified as a residence permit to the European Commission (see [Residence permit](#)). With a valid passport, the 'Diia.pl' entitled to crossing a Polish border.<sup>269</sup> However, in 2022, children, in particular those under 13 years old, struggled with accessing the 'Diia.pl'. The Border Guard claimed though that a child having temporary protection in Poland wanting to re-enter Poland with their parent who presents a valid 'Diia.pl', would be allowed to enter by issuing them a special 15-day permit under Article 32 of the Act on Foreigners (see [Admission to territory](#)). Only in June 2023, the access to Diia.pl was enabled for some children (see [Residence permit](#)).

Using Diia.pl at the Polish borders		
	Number of border crossings to Ukraine	Number of border crossings back to Poland
2022	22,834	69,631
2023	187,565	434,888
2024	Lack of data	Lack of data
2025	266,927	533,600

Based on the information provided by the Border Guard's Headquarters, 9 February 2023, 12 February 2024 and 25 February 2026.

- ❖ Temporary protection beneficiaries have been denied entry to Poland if they stayed in Ukraine for a period longer than 30 days.<sup>270</sup> Under Polish law, the temporary protection status ('PESEL UKR') was withdrawn then,<sup>271</sup> so the 'Diia.pl' also became invalid.<sup>272</sup> In 2025, according to the Ministry of Digital Affairs, Polish authorities were informed about the absence of a special temporary protection beneficiary in Poland for over 30 days in 131,105 cases.<sup>273</sup> Such information should have automatically led to withdrawal of 'PESEL UKR'.
- ❖ If a person concerned confirmed that their absence in Poland was no longer than 30 days (or that for other reasons withdrawing PESEL UKR was incorrect), the 'PESEL UKR' should have been

<sup>267</sup> SIP, *Letter of 30 November 2022 to the European Commission*, available in English [here](#), 3-4.

<sup>268</sup> SIP, 'People who fled from Ukraine should be allowed to re-enter Poland – SIP's opinion', 19 July 2022, available [here](#). Commissioner for Human Rights, 'Trudności uchodźców przy ponownym wjeździe do Polski po powrocie do Ukrainy. Odpowiedź MSWiA', 22 August 2022, available [here](#), ACAPS, 'Poland: Loss of temporary protection status and social benefits for Ukrainian refugees', 14 November 2023, available [here](#), 6. This has been clarified in Article 10(7) of the Special Law, added only in January 2023, repealed since March 2026.

<sup>270</sup> Commissioner for Human Rights, 'Trudności uchodźców przy ponownym wjeździe do Polski po powrocie do Ukrainy. Odpowiedź MSWiA', 22 August 2022, available [here](#).

<sup>271</sup> Article 11(2) in conjunction with Article 4(17a)<sub>(1)</sub> of the Special Law, repealed since March 2026. As of 28 January 2023, the law states that it is '30 days' instead of 'one month'.

<sup>272</sup> However, it has been clarified only in the amendment of the Special Law of 13 January 2023, in Article 10(8) of the Special Law (repealed since March 2026).

<sup>273</sup> Information provided by the Ministry of Digital Affairs, 2 March 2026.

restored.<sup>274</sup> In practice, Ukrainian nationals faced difficulties with proving that they did not leave Poland for over a month.<sup>275</sup>

❖ Moreover, if a person concerned lost temporary protection due to the over 30-day absence in Poland, the 'PESEL UKR' might have been re-granted,<sup>276</sup> if a person came back to Poland due to the war in Ukraine. However, the fact of departure from Ukraine had to have been registered in the special registry run by the Border Guard, which is problematic (see below).<sup>277</sup> Granting again 'PESEL UKR' should have been automatic, if a person concerned entered Poland from Ukraine (via EU external border). The 'PESEL UKR' might have been also re-granted on motion.<sup>278</sup>

❖ Furthermore, numerous temporary protection beneficiaries claimed that they were denied entry to Poland despite being away for periods shorter than 30 days.<sup>279</sup> It resulted from a practice of the Border Guard that registered all departures from Poland of those beneficiaries, but only some of their returns to Poland.<sup>280</sup> Border Guard required at the border checkpoint a direct and clear declaration that a person concerned was entering Poland due to the war in Ukraine, and showing a 'Diia.pl' document, even if they were a temporary protection beneficiary in Poland.<sup>281</sup> Ukrainian nationals were often unaware of these obligations. In consequence, their return to Poland was not inscribed into the special registry. It could result in the loss of temporary protection status because the 30-day period abroad is only interrupted by inscribing the return to Poland to this special registry.<sup>282</sup> Persons concerned were sometimes unaware that their return to Poland had not been properly registered and they were surprised by the fact that they are no longer temporary protection beneficiaries in Poland, *inter alia*, upon another attempt to re-enter Poland after another short-term travel to Ukraine, or when their social welfare was ceased (see [Social welfare](#)).<sup>283</sup> The abovementioned practice of the Border Guard – despite the critique of civil society – was confirmed by the Ministry of Internal Affairs and Administration<sup>284</sup> as well as the Ministry of Family

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<sup>274</sup> Article 4(17b) of the Special Law, repealed since March 2026.

<sup>275</sup> Human Rights Commissioner, 'Uchodźcy z Ukrainy są błędnie pozbawiani statusu uprawniającego do opieki medycznej i pomocy. Interwencja RPO', 16 March 2023, available in Polish [here](#). ACAPS, 'Poland: Loss of temporary protection status and social benefits for Ukrainian refugees', 14 November 2023, available [here](#), 7. Human Rights Commissioner, 'Problemy ze statusem UKR uchodźców wojennych z Ukrainy. Odpowiedź MSWiA', 4 July and 26 August 2024, available in Polish [here](#).

<sup>276</sup> Since 1 July 2024, the Special Law clearly stated that it was re-granted from the day of re-entry.

<sup>277</sup> Human Rights Commissioner, 'Problemy ze statusem UKR uchodźców wojennych z Ukrainy. Odpowiedź MSWiA', 4 July and 26 August 2024, available in Polish [here](#).

<sup>278</sup> Article 4(17f-17h) of the Special Law, repealed since March 2026.

<sup>279</sup> See e.g. UNHCR, 'Poland: Joint Protection Analysis', October 2023, available [here](#), 9; ACAPS, 'Poland: Loss of temporary protection status and social benefits for Ukrainian refugees', 14 November 2023, available [here](#). SIP, 'SIP w działaniu. Raport z działalności Stowarzyszenia Interwencji Prawnej w 2022 r.', September 2023, available in Polish [here](#), 12; Nomada, DRC, 'Poland. Protection Monitoring Analysis. Lower Silesian Voivodeship', November 2023, available [here](#), 11.

<sup>280</sup> Human Rights Commissioner, 'Uchodźcy z Ukrainy są błędnie pozbawiani statusu uprawniającego do opieki medycznej i pomocy. Interwencja RPO', 16 March 2023, available in Polish [here](#).

<sup>281</sup> Border Guard, 'Komunikat dla osób posiadających status PESEL UKR', 27 January 2023, available in Polish [here](#); HNLAC, 'Ważna informacja na temat aplikacji diia.pl', 10 April 2024, available in Polish [here](#).

<sup>282</sup> See also PRAB, 'What we do in the shadows', May 2023, available in English [here](#), 12; PRAB, 'Surprisingly surprised', September 2023, available in English [here](#), 6.

<sup>283</sup> *Ibid.*, SIP, *Input to the EUAA Asylum Report 2023*, February 2023, available in English [here](#), 6; PRAB, 'Surprisingly surprised', September 2023, available in English [here](#), 6; UNHCR, 'Poland: Joint Protection Analysis', October 2023, available [here](#), 10; ACAPS, 'Poland: Loss of temporary protection status and social benefits for Ukrainian refugees', 14 November 2023, available [here](#). The information about these requirements has been published only in Polish at the Border Guard's website, see: [here](#) (27.01.2023). However, the government [declared](#) in July 2023 that actions would be taken – with the Embassy of Ukraine in Poland – to disseminate this information (see Human Rights Commissioner, 'Kiedy obywatel Ukrainy nie straci statusu UKR. Wyjaśnienia MSWiA dla RPO (також українською)', 3 August 2023, available in Polish [here](#)).

<sup>284</sup> Human Rights Commissioner, 'Kiedy obywatel Ukrainy nie straci statusu UKR. Wyjaśnienia MSWiA dla RPO (також українською)', 3 August 2023, available in Polish [here](#). Human Rights Commissioner, 'Problemy ze statusem UKR uchodźców wojennych z Ukrainy. Odpowiedź MSWiA', 4 July and 26 August 2024, available in Polish [here](#).

and Social Affairs.<sup>285</sup> This approach led to the concerns of Ukrainian nationals regarding leaving Poland at all – even for short periods of time,<sup>286</sup> potentially significantly impacting their mobility.

- ❖ In 2024, due to the new rules requiring a valid passport from special temporary protection beneficiaries (see [Registration under temporary protection](#)), many Ukrainian nationals returned to Ukraine to obtain a passport. According to the Human Rights Commissioner, if they showed a new passport at the Polish border crossing when they returned to Poland, their entry was not registered in the special registry; thus, a 30-day period was not interrupted, leading to even more temporary protection withdrawals.<sup>287</sup>
- ❖ Poland did not implement Article 21 of the TPD. Under Article 21(2) of the Temporary Protection Directive, the Member States are obliged to give favourable consideration to requests for a return to the Member State upon a voluntary return. However, this provision has not been implemented into the Special Law and, as shown above, the ‘favourable consideration’ seems to be in general lacking at the Polish borders.<sup>288</sup>

### General temporary protection (until March 2026)

Only in July 2022, the certificate for temporary protection beneficiaries issued under the Act on Protection was notified to the European Commission (see [Residence permit](#)). Beforehand, travels to and from Ukraine of those beneficiaries could have been hampered.

In 2022, the Border Guard registered 197 border crossings back to Ukraine by general temporary protection beneficiaries (on a basis of a certificate issued under Article 110(5) of the Act on Protection). 229 border crossings of those beneficiaries were registered in the opposite direction. In 2023, the numbers rose to 331 border crossings to Ukraine and 241 border crossings back.<sup>289</sup> As regards 2024, the Polish Border Guard reported that they do not gather such data.<sup>290</sup> In 2025, the Border Guard registered 197 border crossings back to Ukraine by general temporary protection beneficiaries and 234 crossings in the opposite direction.<sup>291</sup>

Under the Act on Protection, until 5 March 2026, there were no rules concerning the withdrawal of temporary protection upon any absence in Poland. As a rule, general temporary protection beneficiaries could travel to Ukraine without (temporal or other) limitations.

However, difficulties with pendular movement of non-Ukrainian temporary protection beneficiaries recognised in other Member States have been reported in practice. SIP, HIAS, Right to Protection and Alliance for Black Justice informed in July 2023 about a case of a Russian national – a recognised refugee in Ukraine and a recognised temporary protection beneficiary in Germany, who was denied entry to Poland on her way back from Ukraine to Germany. She had a travel document as well as the documents confirming that she was a refugee in Ukraine and a temporary protection beneficiary in Germany. No decision was issued - she was just orally informed that she cannot enter Poland because she is Russian<sup>292</sup>. In some other cases, temporary protection beneficiaries were not allowed to enter Poland due to the non-recognition/insufficiency of the residence permits issued for temporary protection beneficiaries by other Member States.<sup>293</sup>

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<sup>285</sup> Ministry of Family and Social Affairs, ‘Odpowiedź na interpelację nr 40924 w sprawie problemów obywateli Ukrainy dotyczących nieuzasadnionej utraty świadczenia wychowawczego’, 7 July 2023, available in Polish [here](#).

<sup>286</sup> UNHCR, ‘Poland: Joint Protection Analysis’, October 2023, available [here](#), 10.

<sup>287</sup> Human Rights Commissioner, ‘Problemy ze statusem UKR uchodźców wojennych z Ukrainy. Odpowiedź MSWiA’, 4 July and 26 August 2024, available in Polish [here](#).

<sup>288</sup> SIP, *Letter of 30 November 2022 to the European Commission*, available in English [here](#), 4. M. Łysienka, ‘Following the EU Response to the Russian Invasion of Ukraine? The Implementation of the Temporary Protection Directive in Poland’, CEEMR vol. 12 no. 1, 2023, available [here](#), 192.

<sup>289</sup> Information from the Border Guard’s Headquarters, 9 February 2023 and 12 February 2024.

<sup>290</sup> Information provided by the Border Guard Headquarters, 7 March 2025.

<sup>291</sup> Information provided by the Border Guard Headquarters, 25 February 2026.

<sup>292</sup> SIP, R2P, HIAS and ABJ, Letter of 5 July 2023, available in Polish and English [here](#).

<sup>293</sup> AIDA, ‘Temporary Protection Netherlands’, April 2023, available [here](#), 5.

Moreover, in 2023, some stateless persons were denied entry back to Ukraine, according to the HNLAC.<sup>294</sup>

### Merged temporary protection (since March 2026)

Since 5 March 2026, all temporary protection beneficiaries receive 'PESEL UKR'. 'Diia.pl' entitles them – with a valid passport – to cross the border.<sup>295</sup> Leaving Poland for more than 30 days entails the expiration of temporary protection.<sup>296</sup> The 'PESEL UKR' may be re-granted upon request.<sup>297</sup>

## D. Housing

### Indicators: Housing

- |   |   |
|---|---|
| 1. For how long are temporary protection beneficiaries entitled to stay in reception centres? | unlimited but only for vulnerable persons |
| 2. Number of beneficiaries staying in reception centres as of 31/12/25                        | Not available                             |
| 3. Number of beneficiaries staying in private accommodation as of 31/12/25                    | Not available                             |

Most of the persons displaced from Ukraine live privately in Poland (93% according to the UNHCR's study of November 2023).<sup>298</sup>

According to the Ministry of Internal Affairs and Administration, the number of persons staying in the collective accommodation centres decreased in 2023 (as of 1 March 2023 – 80,932 persons, as of 14 June – 58,732) compared to the end of 2022 (as of 28 December 2022– 84,896).<sup>299</sup> According to the UNHCR, as of April 2024, approximately 40,000 beneficiaries stayed in the centres contracted by the Voivodes or municipal authorities.<sup>300</sup> In October 2025, PFM estimated that approx. 20.000 persons still lived in the collective accommodation centres.<sup>301</sup>

### Special temporary protection (until March 2026)

#### *Collective accommodation centres*

The rules concerning access and stay of special temporary protection beneficiaries in collective accommodation centres changed significantly over time. This accommodation was first offered to all beneficiaries without time limits and charges, then was time-limited to 120 days and charged upon exceeding this timeframe, and, lastly, was made available only to vulnerable persons. The evolution of the respective laws is explained in more detail below.

- ❖ February 2022-March 2023 (full access)

<sup>294</sup> K. Przybysławska, 'Stateless persons from Ukraine seeking protection in Poland', HNLAC, 16 October 2023, available in English [here](#), 17.

<sup>295</sup> Article 110d (9) of the Act on Protection, in force since 5 March 2026.

<sup>296</sup> Article 109b of the Act on Protection, in force since 5 March 2026.

<sup>297</sup> Article 44b (1) of the Population Registry Law, in force since 5 March 2026.

<sup>298</sup> UNHCR, 'Multi-Sector Needs Assessment - Results Overview (MSNA Poland 2023)', November 2023, available [here](#), 36.

<sup>299</sup> Human Rights Commissioner, MSWiA wyjaśnia zasady udziału uchodźców wojennych z Ukrainy w kosztach udzielanej im pomocy, 19 June and 1 August 2023, available in Polish [here](#).

<sup>300</sup> UNHCR, 'Draft law amending the Act on Assistance to Citizens of Ukraine in the Context of the Armed Conflict in Ukraine ("the Special Act"). UNHCR Comments and Observations', April 2024, available [here](#), 4.

<sup>301</sup> PFM, 'Osoby w najtrudniejszej sytuacji życiowej, mieszkające dotychczas z OZZ zagrożone kryzysem bezdomności!', 30 October 2025, available in Polish [here](#).

Until 1 March 2023, regional authorities (voivodes) were obliged to provide accommodation for at least 2 months from entry into Poland of a person concerned.<sup>302</sup> The accommodation was provided free-of-charge in the hastily created collective accommodation centres all over the country. The possibility to timelimit access to accommodation – provided in the Special Law but contrary to the TPD<sup>303</sup> – was not used. Being granted ‘PESEL UKR’ was not required to benefit from collective accommodation.

❖ March 2023-October 2025 (co-payment obligation)

In 2023, Article 12(17) of the Special Law was amended in order to revoke the obligation of any Polish authorities to provide accommodation for persons enjoying special temporary protection in Poland. From then on, it was a discretionary power of these authorities.<sup>304</sup>

Moreover, from 1 March 2023 to 31 October 2025, cost-free accommodation was limited to 120 days. After this period, a temporary protection beneficiary had to cover 50% of the costs of their accommodation, no more than PLN 40 per day per person. In addition, since May 2023, if a person concerned lived in a collective accommodation centre for more than 180 days from entering Poland, they had to cover 75% of the costs (no more than PLN 60 per day per person). The abovementioned rules did not apply to vulnerable temporary protection beneficiaries (see [Guarantees for vulnerable groups](#)).<sup>305</sup> Moreover, according to the amendment adopted in May 2024, payments for children benefiting from 800+ financial allowance were reduced to PLN 15 per day per person.

Furthermore, since 1 March 2023, it was required to obtain ‘PESEL UKR’ to continue accommodation beyond 120 days.

As noticed by SIP in November 2023, the rules concerning the co-payment obligation were criticised by the NGOs and Commissioner for Human Rights<sup>306</sup> since their inception. They were considered to be contrary to the TPD<sup>307</sup> and unclear. In particular, it was vague who is to be considered not obliged to co-pay for the accommodation and how it is going to be assessed. In August 2023, the Migration Consortium published a report<sup>308</sup> concerning the access to accommodation for Ukrainian nationals upon the introduction of the co-payment obligation. The research conducted in 6 voivodeships has shown that there is no coherency in interpreting the law in question and applying this obligation in practice (for more, see [previous annexes on temporary protection to the AIDA reports](#)).

❖ November 2025-February 2026 (only for some vulnerable persons)

In September 2025, when approx. 20.000 beneficiaries were still staying in collective accommodation centres,<sup>309</sup> the scope of assistance was limited once again. From 1 November 2025 onwards only some vulnerable persons could be accommodated in collective accommodation centres (see [Guarantees for vulnerable persons](#)). The accommodation was provided free of charge (no co-payment obligation) and without specific time limits.

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<sup>302</sup> Under Article 12(1) and (4) of the Special Law, repealed since March 2026. The temporal limitation with regard to accommodation was in contradiction with Article 13 of the TPD, see SIP, Letter of 30 November 2022 to the European Commission, available in English [here](#), 5.

<sup>303</sup> M. Łysienia, ‘Following the EU Response to the Russian Invasion of Ukraine? The Implementation of the Temporary Protection Directive in Poland’, CEEMR vol. 12 no. 1, 2023, available [here](#).

<sup>304</sup> See also ECRI, ‘ECRI Report on Poland (sixth monitoring cycle)’, 27 June 2023, available [here](#), 27.

<sup>305</sup> Article 12(17a-f) of the Special Law, repealed since March 2026. This catalogue was considered too narrow, see SIP, Letter to the Ministry of Internal Affairs and Administration, 28 October 2022, available in Polish [here](#), 4.

<sup>306</sup> Human Rights Commissioner, ‘MSWiA wyjaśnia zasady udziału uchodźców wojennych z Ukrainy w kosztach udzielanej im pomocy’, 19 June and 1 August 2023, available in Polish [here](#).

<sup>307</sup> SIP, *Letter to the Ministry of Internal Affairs and Administration*, 28 October 2022, available in Polish [here](#), 3-4. S. Jarosz and W. Klaus (eds), ‘Polska szkoła pomagania’, Konsorcjum Migracyjne, OBMF and CeBaM 2023, available in Polish [here](#), 27.

<sup>308</sup> See the Migration Consortium report: S. Jarosz, W. Klaus (eds), ‘W punkcie wyjścia. Monitoring zbiorowego zakwaterowania uchodźczyń z Ukrainy w 2023 r. w świetle zmian ustawowych’, August 2023, available in Polish [here](#).

<sup>309</sup> PFM, ‘Osoby w najtrudniejszej sytuacji życiowej, mieszkające dotychczas z OZZ zagrożone kryzysem bezdomności!’, 30 October 2025, available in Polish [here](#).

The change was criticised by the Human Rights Commissioner and NGOs who argued that not all persons in need of accommodation are covered by the new rules (e.g. violence victims, persons with psychological problems, persons in difficult financial situation, single mothers, disabled persons not having Polish certificates of disability are excluded) and that the law is incoherent with TPD.<sup>310</sup>

Moreover, from September 2025, Ukrainian nationals could be forced to leave collective accommodation centres if they regularly disrespected specific rules within the centre, drink alcohol or use drugs, were violent or did not pay for the accommodation.<sup>311</sup>

#### ❖ Conditions

In practice, forms and conditions of accommodation provided to beneficiaries of temporary protection by the Polish authorities have differed significantly within the country. There are no applicable standards with regard to these conditions.<sup>312</sup> In the first months, places of collective accommodation, i.e. conference halls, sports centres, railway stations, and offices, that were hosting hundreds and thousands of persons at the same time, were criticised by civil society organisations and human rights institutions for low sanitary and security standards, lack of privacy, overcrowding, distant locations and management by different entities.<sup>313</sup> In 2023-2024, conditions in the centres that continued to operate improved insignificantly or not at all.<sup>314</sup>

In 2023 and 2024, many accommodation centres were shut down (with some closures being deemed premature).<sup>315</sup> Before the closure of the centre, temporary protection beneficiaries needed to find an apartment by themselves or they were relocated to other centres – sometimes far away and multiple times. Such (multiple) relocations often hampered the integration processes that have already started in the previous place of accommodation.<sup>316</sup>

Some persons who fled from Ukraine were also discriminated in their access to accommodation, with Roma individuals being particularly affected<sup>317</sup> (see [Guarantees for vulnerable groups](#)). In March 2024, a centre in Kidałowice hosting Roma families from Ukraine was unexpectedly closed, leaving over 300 persons homeless.<sup>318</sup>

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<sup>310</sup> Human Rights Commissioner, 'Opinia RPO do projektu zmian w ustawie o pomocy obywatelom Ukrainy', 24 July 2025, available in Polish [here](#); SIP, 'Komentarz do projektu ustawy o zmianie Ustawy o pomocy obywatelom Ukrainy...', July 2025, available in Polish [here](#); PFM, 'Osoby w najtrudniejszej sytuacji życiowej, mieszkające dotychczas z OZZ zagrożone kryzysem bezdomności!', 30 October 2025, available in Polish [here](#).

<sup>311</sup> Article 12 (17k) of the Special Law, in force from 30 September 2025 until 4 March 2026.

<sup>312</sup> As regards Warsaw, see Warsaw City Hall, 'Warsaw in the refugee crisis. Report for the first three months', June 2022, available [here](#), Human Rights Commissioner, 'Zastępcy RPO odwiedzili centra recepcyjne w Warszawie', 14 April 2022, available in Polish [here](#), and 'Wizyta przedstawicieli BRPO w centrum recepcyjnym w hali Global EXPO przy ul. Modlińskiej w Warszawie', 6 May 2022, available in Polish [here](#). As regards Lublin, see A. Dąbrowska, 'Lublin Social Committee to Aid Ukraine. 90 days of assistance. Report', available in English [here](#). As regards Przemyśl, see Human Rights Commissioner, 'Problemy uchodźców wojennych w Przemyślu. RPO ponownie pisze do wojewody. Jest odpowiedź', 23 December 2022, 25 January 2023, available in Polish [here](#). S. Jarosz, W. Klaus (eds), 'W puknie wyjścia. Monitoring zbiorowego zakwaterowania uchodźczyń z Ukrainy w 2023 r. w świetle zmian ustawowych', Migration Consortium, August 2023, available in Polish [here](#), 20; N. Bloch, Z. Szmyt, 'Nomadland. Miejsca zbiorowego zakwaterowania osób uchodźczych z Ukrainy w Wielkopolsce a procesy integracyjne', Raport CeBaM UAM 1/2024, available in Polish [here](#), 8.

<sup>313</sup> S. Jarosz and W. Klaus (eds), 'Polska szkoła pomagania', Konsorcjum Migracyjne, OBMF and CeBaM 2023, available in Polish [here](#), 26-27.

<sup>314</sup> S. Jarosz, W. Klaus (eds), 'W puknie wyjścia. Monitoring zbiorowego zakwaterowania uchodźczyń z Ukrainy w 2023 r. w świetle zmian ustawowych', Migration Consortium, August 2023, available in Polish [here](#), 9.

<sup>315</sup> Ibid., 6, 23-24, 26.

<sup>316</sup> N. Bloch, Z. Szmyt, 'Nomadland. Miejsca zbiorowego zakwaterowania osób uchodźczych z Ukrainy w Wielkopolsce a procesy integracyjne', Raport CeBaM UAM 1/2024, available in Polish [here](#), 35-36.

<sup>317</sup> Fundacja w Stronę Dialogu, 'To nie są uchodźcy, tylko podróżnicy. Sytuacja romskich osób uchodźczych w województwie podkarpackim. Raport monitoringowy 2022-2023', July 2023, available in Polish [here](#), 46-48.

<sup>318</sup> Fundacja w Stronę Dialogu, 'Rodziny romskie na bruku. Zamknięto ośrodek w Kidałowicach', March 2024, available in Polish [here](https://fundacjawstronedialogu.pl/osrodek-w-kidalowicach-zamkniety/): <https://fundacjawstronedialogu.pl/osrodek-w-kidalowicach-zamkniety/>.

In July 2024, the Ministry of Internal Affairs and Administration signed an agreement with the Polish Red Cross and Polish Center for International Aid to implement a project “Together to self-reliance”. The beneficiaries of the project – living in the collective accommodation centres – had a possibility to benefit from financial and integration support upon leaving the accommodation centre. The project was implemented until March 2026.<sup>319</sup>

Special temporary protection beneficiaries were not accommodated in the reception centres for asylum seekers.

### *Private accommodation*

Many Ukrainian nationals and their family members enjoying special temporary protection in Poland were accommodated privately. Some of them, especially at the beginning of the war, were offered free accommodation by Polish nationals and private companies.

Until 1 July 2024, the Special Law provided for a financial allowance – PLN 40 per person per day (40+ allowance) – for persons who offered a free-of-charge accommodation *and* food to special temporary protection beneficiaries. This assistance was limited to 120 days; only in particularly justified circumstances, it could be prolonged (see [Guarantees to vulnerable persons](#)). It was paid to a landlord, upon their motion.<sup>320</sup> There was no possibility to appeal when the allowance was denied, but individuals could initiate civil proceedings against the municipality in such cases.<sup>321</sup> Since 30 April 2022, having a PESEL number by a tenant was required.<sup>322</sup> In 2022, 1,211,110 applications for 40+ allowance were registered, in 2023 over 560,000 applications were registered, in 2024 over 284,000. Some difficulties in obtaining this allowance and abuses were reported.<sup>323</sup> In May 2024, the rules concerning this financial allowance were repealed. It caused panic amongst temporary protection beneficiaries living in the private centres financed from the 40+ allowance. The government argued that the use of this allowance was abused by persons and companies who – aiming to earn money rather than to support persons in need – offered conditions on the lowest possible level. However, no new means to support private accommodation of special temporary protection were offered by the government instead of the 40+ allowance.<sup>324</sup> The concerned persons could only seek housing in the collective accommodation centres,<sup>325</sup> but this possibility was also severely restricted in September 2025 (see above) and March 2026 (see below).

### *Homelessness*

Cases of homeless Ukrainian nationals persisted throughout 2023 and 2024.<sup>326</sup> According to a survey conducted for the Ministry of Family, Labour and Social Affairs in February 2024, 1,749 Ukrainian

<sup>319</sup> Ministry of Internal Affairs and Administration, ‘MSWiA liderem projektu dotyczącego pomocy uchodźcom wojennym z Ukrainy’, 8 July 2024, available in Polish [here](#).

<sup>320</sup> Article 13 of the Special Law, in force until 1 July 2024.

<sup>321</sup> Article 13(1b) of the Special Law, in force until 1 July 2024. See also Provincial Administrative Court in Szczecin, decision of 20 October 2023, no. II SA/Sz 770/23, District Court Szczecin-Centrum, decision of 21 December 2023, no. III C 523/23, available in Polish [here](#).

<sup>322</sup> Human Rights Commissioner stated that this change had deprived some landlords of a possibility to request an allowance for periods before 30 April 2022. Subsequently, the law was changed to enable seeking allowance for those periods. Human Rights Commissioner, ‘Udzielali schronienia uchodźcom z Ukrainy - mogą nie dostać świadczenia od państwa. Interwencja Rzecznika’, 16 May 2022, available in Polish [here](#).

<sup>323</sup> See e.g. SIP, *Input to the EUAA Asylum Report 2023*, February 2023, available in English [here](#), 16; Human Rights Commissioner, ‘Luki w przepisach specustawy o pomocy Ukraińcom dot. pieniędzy na zakwaterowanie i wyżywienie uchodźców. RPO pisze do MSWiA’, 6 April 2022, available in Polish [here](#). Nomada, DRC, ‘Poland. Protection Monitoring Analysis. Lower Silesian Voivodeship’, November 2023, available [here](#). Monika Szulecka, Konsorcjum Migracyjne na zlecenie Międzynarodowej Organizacji ds. Migracji (IOM), ‘Ryzyko wyciszenia w kontekście pracy i zakwaterowania migrantów w Polsce po 2022 r.’, 2025, available in Polish [here](#), 21-22.

<sup>324</sup> Fundacja Dom Ukraiński, Biuletyn Domu Ukraińskiego nr 3-4, May 2024, available in Polish [here](#), 4.

<sup>325</sup> PolskieRadio.pl, ‘Do some Ukrainian war refugees in Poland face a homelessness crisis?’, 14 September 2024, available in English [here](#).

<sup>326</sup> Amnesty International Polska, “Ukraińcom nie chcą wynajmować”. Najnowsze badania Amnesty International’, May 2023, available in Polish [here](#), 12; Fundacja Dom Ukraiński, Biuletyn Domu Ukraińskiego nr 3-4, May 2024, available in Polish [here](#), 4.

nationals living in Poland declared experiencing or being at risk of homelessness.<sup>327</sup> This risk increased upon the cancellation of the 40+ allowance in July 2024 and the limitation of access to collective accommodation centres starting November 2025.<sup>328</sup> According to the PCPM, homeless special temporary protection beneficiaries struggled to access assistance mostly because of: a language barrier (limiting their access to homeless shelters), lack of address (hampers access to social assistance), bureaucracy (requiring a document of lack of income to access some assistance) and lack of special shelters for single mothers from Ukraine since November 2025.<sup>329</sup>

### General temporary protection (until March 2026)

Under the Act on Protection, until 4 March 2026, temporary protection beneficiaries had access to accommodation and food in the reception centres for asylum seekers (for more about those centres, see [Reception](#)), upon their motion and provided that they received a certificate for temporary protection beneficiaries first.<sup>330</sup> However, if the Head of the Office for Foreigners had no possibility to offer this kind of accommodation, a financial allowance was paid instead. Then, a beneficiary had to find accommodation on their own. A reception in private housing was not organised by Polish authorities.

In 2022, only 6 persons benefited from accommodation in the reception centres for asylum seekers (one family of four for almost one month in the centre in Dębak, next in Linin; one person for 3 months in Dębak, and one person for 10 days in Biała Podlaska).<sup>331</sup> In 2023, 15 persons applied for the provision of food and accommodation in the reception centre. 10 persons were accommodated in these centres (9 persons in Bezwola for almost three months and 1 person in Podkowa Leśna-Dębak for approx. 4,5 months). Only one person remained there at the end of 2023.<sup>332</sup> In 2024, only one general temporary protection beneficiary was accommodated in the reception centre.<sup>333</sup> In 2025, no general temporary protection beneficiary was accommodated there.<sup>334</sup>

A financial allowance for temporary protection beneficiaries was the same as the one provided for asylum seekers. It amounted to PLN 25 (or less) per day, so at maximum PLN 750-775 per month per person. In practice, this allowance was not sufficient to finance all basic needs of a beneficiary, in particular to rent an apartment (for more see [Reception - Forms and levels of material reception conditions](#)). Thus, general temporary protection beneficiaries were not receiving sufficient 'means to obtain housing', against Article 13 of the TPD.<sup>335</sup> However, unlike asylum seekers, temporary protection beneficiaries could work or run a business in Poland (see [Access to the labour market](#)); thus, they might have had supplementary sources of income.

The assistance was provided for a period of minimum 2 months, but no longer than for the period of the validity of the certificate for temporary protection beneficiaries.<sup>336</sup> This period was determined individually, in the Head of the Office for Foreigner's decision. According to the Office for Foreigners, if this period ended, a person concerned might have applied for assistance to be granted again.<sup>337</sup> The assistance was dependent on the financial situation of the beneficiary, however, accommodation was granted irrespective

<sup>327</sup> Ministry of Family, Labour and Social Affairs, Wyniki Ogólnopolskiego badania liczby osób bezdomnych - Edycja 2024, 26 June 2024, available in Polish [here](#). See also FEANTSA, INCREASED RISKS OF HOMELESSNESS FOR PEOPLE FLEEING UKRAINE AMID EXTENSION OF TEMPORARY PROTECTION AND RESTRICTIVE NATIONAL TRENDS, February 2025, available in English [here](#), 7.

<sup>328</sup> PolskieRadio.pl, 'Do some Ukrainian war refugees in Poland face a homelessness crisis?', 14 September 2024, available in English [here](#). PFM, 'Osoby w najtrudniejszej sytuacji życiowej, mieszkające dotychczas z OZZ zagrożone kryzysem bezdomności!', 30 October 2025, available in Polish [here](#)

<sup>329</sup> PCPM, 'Dostęp cudzoziemców w kryzysie bezdomności do pomocy społecznej w Polsce', 2026, available in Polish [here](#).

<sup>330</sup> Article 112 of the Act on Protection, as in force until 4 March 2026.

<sup>331</sup> Information provided by the Office for Foreigners, 17 January 2023.

<sup>332</sup> Information provided by the Office for Foreigners, February 2024.

<sup>333</sup> Information provided by the Office for Foreigners, 14 March 2025.

<sup>334</sup> Information provided by the Office for Foreigners, 10 April 2026.

<sup>335</sup> SIP, *Letter of 30 November 2022 to the European Commission*, available in English [here](#), 5-6.

<sup>336</sup> Article 112(1a) of the Act on Protection, as in force until 4 March 2026. This temporal limitation with regard to accommodation is in contradiction with Article 13 of the TPD, see SIP, *Letter of 30 November 2022 to the European Commission*, available in English [here](#), 5.

<sup>337</sup> Information provided by the Office for Foreigners, 17 January 2023.

of the income of the person concerned (see [Social welfare](#)).<sup>338</sup> Moreover, the assistance was not granted if a person concerned sought asylum (then, they benefitted from material reception conditions for asylum seekers).<sup>339</sup>

A temporary protection beneficiary accommodated in a reception centre for asylum seekers was entitled to some additional benefits (i.e. a financial allowance for cleaning and personal hygiene products, Polish language lessons, covering transport expenses).<sup>340</sup>

## **Merged temporary protection (since March 2026)**

### *New rules*

Since March 2026, housing in collective accommodation centres or receipt of the benefit to cover private accommodation expenses may be provided to temporary protection beneficiaries only for 60 days from their first entry into Poland and merely within 12 months from the beginning of the conflict that led to activation of temporary protection.<sup>341</sup> Thus, those rules do not apply to persons fleeing the full-scale invasion of Ukraine that started in 2022.

Since March 2026, only vulnerable temporary protection beneficiaries (as defined in Article 112(5) of the Act on Protection, see [Guarantees for vulnerable applicants](#)) may be given access to collective accommodation with full board. They must have 'PESEL UKR' number and show that they cannot organise housing by themselves (Article 112(3) of the Act on Protection).

### *Transitional provisions*

Temporary protection beneficiaries who are not covered by Article 112 (3) and (5) of the Act on Protection can live in collective accommodation centres until the end of June 2026.<sup>342</sup>

Temporary protection beneficiaries whose certificates confirming that they enjoyed temporary protection in Poland remained valid until 4 March 2027 (see [Residence permit](#)) can still be granted a financial allowance to cover their accommodation and living expenses (the same as for asylum seekers).<sup>343</sup>

## **E. Employment and education**

### **1. Access to the labour market**

The differential access to labour market of special and general temporary protection beneficiaries was criticised and considered to be against the TPD.<sup>344</sup>

## **Special temporary protection (until March 2026)**

### *Notification procedure*

Since 24 February 2022, in addition to the previous rules concerning third-country nationals' labour in Poland,<sup>345</sup> Ukrainian nationals are entitled to work in Poland, if:

- a. they enjoy special temporary protection in Poland, or

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<sup>338</sup> Article 112(4-4f) of the Act on Protection, as in force until 4 March 2026.

<sup>339</sup> Article 112(1b) of the Act on Protection, as in force until 4 March 2026.

<sup>340</sup> Article 112(6-8) of the Act on Protection, as in force until 4 March 2026.

<sup>341</sup> Article 112(1) of the Act on Protection, as in force since 5 March 2026.

<sup>342</sup> Article 32 of the Phasing-Out Law.

<sup>343</sup> Article 20(3) of the Phasing-Out Law.

<sup>344</sup> M. Górski, 'Wpływ specustawy ukraińskiej na sytuację prawną migrantów przymusowych z Ukrainy na polskim rynku pracy', CMR Working Papers 135/193, September 2023, available in Polish [here](#).

<sup>345</sup> Before 24 February 2022, Ukrainian nationals already had facilitated access to labour market in Poland.

b. they are staying legally in Poland, and if an employer informs – online, within 7 days from the start of the work (it was 14 days before 30 June 2024) – a labour office about hiring a Ukrainian national (a ‘notification procedure’). Work must be provided in accordance with the notice: it must be performed in no less time than indicated in the notice and paid no less than the remuneration indicated therein. The working time and remuneration can be proportionally increased.<sup>346</sup> Since 1 July 2024, the remuneration should be no less than minimum wage and a change in the conditions of employment must be notified too. Having a PESEL number is not required to work in Poland under those new rules. The introduction of the notification obligation was seen as contrary to TPD by some authors.<sup>347</sup>

In 2022, 786,164 notifications were registered concerning 558,719 third-country nationals.<sup>348</sup> In 2023, the notification procedure was the most popular pathway for legalizing the work of Ukrainian nationals in Poland (85% of Ukrainian workers in 2023). From 15 March 2022 (the first notification in practice) to 31 December 2023, 1,866,000 notifications were registered. At the end of 2023, 358,000 Ukrainian nationals worked in Poland on the basis of notification.<sup>349</sup> In 2024, 1,007,875 notifications were registered.<sup>350</sup> In total, from March 2022 to December 2024, approx. 2,877,000 notifications were registered in Poland.<sup>351</sup> In 2025, almost 1.035.000 notifications were registered.<sup>352</sup> It must be highlighted that the abovementioned data concern number of notifications – not the number of persons. One person can work based on several notifications during the year. Moreover, these numbers include not only special temporary protection beneficiaries but also some Ukrainian nationals staying legally in Poland.

### *Illegal employment*

In practice, some employers did not notify that they employed Ukrainian nationals. If an employer does not fulfil the notification obligation, a Ukrainian national should not have been fined (the exception from a general rule).<sup>353</sup> In April 2024, the Border Guard confirmed that no Ukrainian national was fined for illegal work since the beginning of the war in Ukraine.<sup>354</sup> However, it should be mentioned that working without a notification or against its conditions may be considered an illegal work, which may lead to issuing a return decision.<sup>355</sup>

In 2022-2025, some Ukrainian nationals were found to have been working illegally in Poland.<sup>356</sup> In 2025, it was 4,392 Ukrainian nationals.<sup>357</sup> It is also worth mentioning that in the CARE study of October 2023, almost half of the respondents (Ukrainian domestic workers who mostly came to Poland after the latest

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<sup>346</sup> Article 22(1) of the Special Law, repealed in March 2026.

<sup>347</sup> I. Florczak, J.K. Adamski, ‘Mass influx of people from Ukraine: social entitlements and access to the labour market: Poland’, in: I. Florczak, J.K. Adamski (eds), *Mass influx of people from Ukraine: social entitlements and access to the labour market*, Universita di Bologna 2024, available [here](#), 313.

<sup>348</sup> Information from the Ministry of Family and Social Affairs, 16 January 2023.

<sup>349</sup> Ministry of Family, Labour and Social Policy, ‘Informacja o zatrudnieniu cudzoziemców w Polsce’, January 2024, available in Polish [here](#), 7, 12.

<sup>350</sup> Information provided by the Ministry of Family, Labour and Social Affairs, 6 February 2025. See also similar data provided by the Ministry [here](#).

<sup>351</sup> Ministry of Family, Labour and Social Policy, ‘Informacja o zatrudnieniu cudzoziemców w Polsce - 2024 rok’, March 2025, available in Polish [here](#), 13.

<sup>352</sup> Preliminary data of the Ministry of Family, Labour and Social Policy, as of 21 January 2026.

<sup>353</sup> Article 22(5c) of the Special Law, repealed in March 2026. However, in their communications the Border Guard claims differently, see e.g. Border Guard, ‘Pracowali nielegalnie w Polsce’, 11 March 2024, available in Polish [here](#).

<sup>354</sup> SIP, ‘Ukrainian citizens may not be punished for employers’ mistakes’, 8 April 2024, available [here](#).

<sup>355</sup> SIP, *Letter to the Polish Parliament*, 9 December 2022, available in Polish [here](#), 5-6; SIP, Komentarz do projektu ustawy o zmianie Ustawy o pomocy obywatelom Ukrainy...’, July 2025, available in Polish [here](#)

<sup>356</sup> See numerous posts published at the Border Guard’s website about the controls of the legality of employment in Polish companies and finding out that Ukrainian nationals were employed illegally, e.g. ‘Pracowali nielegalnie w Polsce’, 9 November 2022, available in Polish [here](#) (73 Ukrainian nationals found to be working illegally); ‘Nielegalnie zatrudnieni w firmie budowlanej’, 15 November 2022, available in Polish [here](#). ‘Skontrolowano legalność zatrudnienia 760 cudzoziemców’, 21 November 2022, available in Polish [here](#) (34 Ukrainian nationals); ‘Pracowali bez zezwolenia i na innych warunkach’, 7 November 2023, available in Polish [here](#). ‘Pracowali nielegalnie w Polsce’, 11 March 2024, available in Polish [here](#); ‘Skontrolowali pracę przeszło 540 cudzoziemców’, 22 January 2025, available in Polish [here](#).

<sup>357</sup> Border Guard’s official statistics for 2025, published [here](#).

Russian invasion of Ukraine) admitted to having no contract with their employees.<sup>358</sup> In November 2023, the study by DRC and Nomada, focussing on the Lower Silesian voivodeship, showed that employers are unwilling to legally employ Ukrainian nationals and pay them remuneration in full or at all. Ukrainian nationals are, however, unaware of how to report such violations or are afraid to do so.<sup>359</sup>

#### *Facilitations in accessing the labour market*

Some facilitations in accessing the labour market were provided for in the Special Law with regard to Ukrainian:

- a. doctors and dentists (Articles 61-63, repealed in March 2026, with exceptions, see below),
- b. nurses and midwives (Article 64, repealed in March 2026, with exceptions, see below),
- c. psychologists (Articles 64a and 64b, only until 24 August 2023, and again from 1 July 2024 to 4 March 2026, repealed as of 5 March 2026, see more [Health care](#)),
- d. academic teachers and researchers (Article 46-49, repealed in March 2026),
- e. school teachers' assistants if they know the Polish language (Article 57-57a<sup>360</sup>, depending on the position, until 31 August 2026 and 4 March 2027),
- f. miners (Article 23b, until 4 March 2027),
- g. persons working in public offices (Article 23a, repealed in March 2026),
- h. persons working in the foster care system (upon the consent of specified authorities, Article 27(9-16) of the Special Law, repealed in March 2026);.

Some of those facilitations apply to all Ukrainian nationals having particular qualifications, others apply only to special temporary protection beneficiaries or Ukrainian nationals legally staying in Poland.

From 1 April 2023, special temporary protection beneficiaries could apply in a facilitated manner for a temporary residence permit related to their work or business.<sup>361</sup> However, obtaining a temporary residence permit meant losing temporary protection in Poland (Article 2(3)(1)(c) of the Special Law, repealed in March 2026).

#### *Unemployment and job seeking*

Ukrainian nationals who enjoyed special temporary protection in Poland, or stayed legally in Poland, could also register as unemployed persons in Poland.<sup>362</sup> Throughout 2025, 14,110 special temporary protection beneficiaries were registered as unemployed persons, with 6,908 registered at the end of the year.<sup>363</sup>

The governmental and local portals were created to facilitate contact between Ukrainian nationals seeking employment (having a PESEL number) and employers in Poland.<sup>364</sup> As of 4 January 2023, 3,535 persons benefited from the governmental database.<sup>365</sup> It was discontinued in January 2026. IOM Poland also activated a special website - in Polish and Ukrainian language – concerning legal employment in Poland.<sup>366</sup> On many job-seeking websites, ads were published by Polish employers offering jobs to persons displaced from Ukraine.<sup>367</sup>

#### *Running a business*

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<sup>358</sup> CARE, 'In the Shadows. Ukrainian Domestic Workers in Poland', 25 October 2023, available [here](#), 31.

<sup>359</sup> Nomada, DRC, 'Poland. Protection Monitoring Analysis. Lower Silesian Voivodeship', November 2023, available [here](#), 5-8.

<sup>360</sup> Article 57a of the Special Law, in force since 1 September 2024.

<sup>361</sup> Article 42 (13-19) of the Special Law, repealed in March 2026.

<sup>362</sup> Article 22(6-7) of the Special Law, repealed in March 2026.

<sup>363</sup> Information provided by the Ministry of Family, Labour and Social Affairs, 21 January 2026.

<sup>364</sup> Article 22a-22h of the Special Law, repealed in March 2026. See e.g. A. Dąbrowska, 'Lublin Social Committee to Aid Ukraine. 90 days of assistance. Report', available in English [here](#), 7-8.

<sup>365</sup> Information provided by the Ministry of Digital Affairs, 1 March 2023.

<sup>366</sup> See, [here](#).

<sup>367</sup> A. Chłoń-Domińczak i R. Pater, 'Labour market and the economy', in: M. Bukowski and M. Duszczak (eds), *Hospitable Poland 2022+*, WiseEuropa 2022, available [here](#), 36.

Special temporary protection beneficiaries could run a business in Poland under the same rules as Polish citizens. Having a PESEL number was required.<sup>368</sup> Until 4 March 2026, Ukrainian nationals running a registered business in Poland could obtain a temporary residence permit without proving that they have a sufficient income, or without fulfilling other criteria normally required in these proceedings.<sup>369</sup> However, obtaining a temporary residence permit meant losing temporary protection in Poland (Article 2(3)(1)(c) of the Special Law, repealed in March 2026). According to a study published in February 2025, since February 2022, Ukrainian nationals have opened over 90,000 companies in Poland (mostly in a form of sole proprietorship – 77,000).<sup>370</sup>

### *Labour market integration*

While special temporary protection beneficiaries in particular, and Ukrainian nationals in general, face some difficulties in finding jobs in Poland (see below), their integration into the Polish labour market is considered overall good.<sup>371</sup>

However, the data concerning Ukrainian nationals' active participation in the Polish labour market differ depending on the study.<sup>372</sup> For example, according to report of EWL and Warsaw University, as of February 2023, approx. 900,000 Ukrainian nationals who fled from Ukraine after 24 February 2022, found jobs in Poland (82% of adults). 27% of the respondents who work in Poland found a job in the first three months upon arrival.<sup>373</sup> In December 2023, the Polish Economic Institute reported that, according to their study, 65% of Ukrainian nationals who fled the Russian invasion found a job in Poland.<sup>374</sup> According to the government, as of January 2025, 78% of special temporary protection beneficiaries worked in Poland.<sup>375</sup> In December 2025, the Polish Economic Institute assessed that Ukrainian nationals promptly and vastly integrated into the Polish labour market (with 75-85% being employed) but that their cultural and social integration had been progressing slower.<sup>376</sup>

In March 2024, UNHCR and Deloitte published a study showing that employment of Ukrainian nationals who fled the Russian invasion positively affected the Polish economy.<sup>377</sup> This is confirmed by other studies<sup>378</sup> and data presented by the government in January 2025 showing that in 2023 special temporary protection beneficiaries contributed to the state budget by paying in taxes and social contributions PLN 15 billion.<sup>379</sup> In June 2025, UNHCR and Deloitte published another study stating that: 'In 2024, Ukrainian refugees' net impact amounted to 2.7% of the Polish GDP'.<sup>380</sup>

### *Barriers to accessing labour market*

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<sup>368</sup> Article 23 of the Special Law, repealed in March 2026.

<sup>369</sup> Article 42(12) and (12a) of the Special Law, repealed in March 2026.

<sup>370</sup> Polski Instytut Ekonomiczny, 'Od początku rosyjskiej inwazji w 2022 r. Ukraińcy założyli w Polsce prawie 90 tys. firm', February 2025, available in Polish [here](#).

<sup>371</sup> P. Kaczmarczyk, 'How serious is the risk of deskilling of Ukrainian war refugees (and what we can do about it)', CMR Spotlight no. 9 (54), September 2023, available [here](#), 3.

<sup>372</sup> See also L. Lukianova, 'Ukraińscy migranci wojenni na polskim rynku pracy. Szanse i ograniczenia', Rynek Pracy 187(4), available in Polish [here](#), 66.

<sup>373</sup> EWL and Warsaw University, 'Uchodźcy wojenni z Ukrainy. Rok w Polsce', February 2023, available in Polish [here](#).

<sup>374</sup> PIE, 'Uchodźcy z Ukrainy na polskim rynku pracy: możliwości i przeszkody', December 2023, available in Polish [here](#).

<sup>375</sup> 'Stanowisko Fundacji „Ukraiński Dom” w sprawie zmian zasad wsparcia „800+” dla uchodźców wojennych z Ukrainy', 3 lutego 2025 r., available in Polish [here](#).

<sup>376</sup> PIE, 'Integracja imigrantów z Ukrainy na tle planów dotyczących pobytu w Polsce', December 2025, available in Polish [here](#).

<sup>377</sup> UNHCR, Deloitte, 'Analysis of the impact of refugees from Ukraine on the economy of Poland', March 2024, available [here](#).

<sup>378</sup> Polski Instytut Ekonomiczny, 'Od początku rosyjskiej inwazji w 2022 r. Ukraińcy założyli w Polsce prawie 90 tys. firm', February 2025, available in Polish [here](#).

<sup>379</sup> 'Stanowisko Fundacji „Ukraiński Dom” w sprawie zmian zasad wsparcia „800+” dla uchodźców wojennych z Ukrainy', 3 lutego 2025 r., available in Polish [here](#).

<sup>380</sup> UNHCR, Deloitte, 'Analysis of the impact of refugees from Ukraine on the economy of Poland', June 2025, available [here](#).

According to a 2022 study, Ukrainian women who came to Poland after 24 February 2022 indicated that the biggest challenges in accessing the labour market, in particular running a business here, were mostly the lack of knowledge of the Polish language and the necessity to provide care for their children during the working hours. However, overall, they felt more supported by Polish authorities rather than facing difficulties.<sup>381</sup> Another study conducted in 2022 identified several barriers to running a business in Poland that were recognised by Ukrainian nationals, including the lack of knowledge of Polish law and practices, overly complicated rules regarding staying and working in Poland, financial difficulties, and challenges in finding employees and suitable premises in Poland.<sup>382</sup>

Already in March 2022, special temporary protection beneficiaries were given a possibility to have their qualifications recognised without having an original diploma by initiating a special procedure.<sup>383</sup> However, this opportunity is not available to other Ukrainian nationals, e.g. those who came to Poland before 24 February 2022.<sup>384</sup> Moreover, in June 2023, ECRI called on Polish authorities to facilitate the recognition of diplomas and other qualifications of Ukrainian workers. The procedure is currently too lengthy and costly.<sup>385</sup> The respective rules have not been changed in 2023-2025.<sup>386</sup>

The UNHCR's report of November 2023 shows that 61% of respondents – Ukrainian nationals of working age – worked in Poland and 32% of respondents declared difficulties in supporting themselves and finding a job. The main challenges included: a lack of knowledge of the Polish language, a lack of decent employment opportunities and a lack of employment opportunities suited to their skills.<sup>387</sup> Deskilling continues to be reported, prompting decisions of beneficiaries to return to Ukraine.<sup>388</sup>

Other sources showed that some Ukrainian nationals did not access labour market due to the traumatic experiences in Ukraine and the following poor mental health, or the problems with the childcare.<sup>389</sup>

The Polish National Bank presented its own studies on the economic situation of Ukrainian nationals who fled Russian invasion. 62% in 2023 and 68% in 2024 of respondents were employed; however, they tended to work in temporary, seasonal and part-time jobs more often than pre-war migrants from Ukraine. Additionally, a higher percentage of them were paid less than PLN 3,000 per month (48% compared to 21%) in 2023 and less than PLN 4,000 per month (60% compared to 40%) in 2024.<sup>390</sup> According to the 2025 study, Ukrainian nationals who came to Poland from 2022 are increasingly employed in permanent positions (38% in 2023, 54% in 2025) and self-employed (2% in 2022 and 4% in 2025). The number of unemployed Ukrainian nationals decreased from 25% in 2023 to 14% in 2025. Still, however, remunerations of Ukrainian nationals are lower and their unemployment rate is higher than Polish

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<sup>381</sup> SWPS, 'Hello Entrepreneurship 2022. Czynniki hamujące oraz wspierające przedsiębiorczość migrantek z Ukrainy, które przyjechały do Polski po eskalacji wojny 24 lutego 2022 r.', available in Polish [here](#), 6-7, 19.

<sup>382</sup> See also Dębowska, K., Kłosiewicz-Górecka, U., Szymańska, A., Wejt-Knyżewska, A., Zybortowicz, K., 'Ukraińskie firmy w Polsce po wybuchu wojny w 2022 r.', Polski Instytut Ekonomiczny, January 2023, available in Polish [here](#), 25-31.

<sup>383</sup> Article 327(3) of the Law of 20 July 2018 on Higher Education and Science (Ustawa z dnia 20 lipca 2018 r. Prawo o szkolnictwie wyższym i nauce).

<sup>384</sup> Human Rights Commissioner, 'Nostryfikacja dyplomów obywateli Ukrainy – bez względu na datę ich przybycia do Polski. MEiN odpowiada RPO', 29 November and 28 December 2022, available in Polish [here](#).

<sup>385</sup> ECRI, 'ECRI Report on Poland (sixth monitoring cycle)', 27 June 2023, available [here](#), 28. See also Nomada, DRC, 'Poland. Protection Monitoring Analysis. Lower Silesian Voivodeship', November 2023, available [here](#), 11.

<sup>386</sup> Council of Europe Directorate of human rights division on migration and refugees, *Report on the mission to Poland*, 4 – 5 February 2026, 1 April 2026, available [here](#), 6.

<sup>387</sup> UNHCR, 'Multi-Sector Needs Assessment - Results Overview (MSNA Poland 2023)', November 2023, available [here](#), 19, 24-25. See also P. Kaczmarczyk, 'How serious is the risk of deskilling of Ukrainian war refugees (and what we can do about it)', CMR Spotlight no. 9 (54), September 2023, available [here](#), 3-4.

<sup>388</sup> Piotr Lewandowski, Agata Górny, Mateusz Krząkała and Marta Palczyńska, 'The Role of Job Task Degradation in Shaping Return Intentions: Evidence from Ukrainian War Refugees in Poland', IBS WORKING PAPER 01/2025, March 2025, available in English [here](#).

<sup>389</sup> L. Lukianova, 'Ukraińscy migranci wojenni na polskim rynku pracy. Szanse i ograniczenia', Rynek Pracy 187(4), available in Polish [here](#), 66, 75.

<sup>390</sup> NBP, 'Sytuacja życiowa i ekonomiczna migrantów z Ukrainy w Polsce w 2023 roku. Raport z badania ankietowego', December 2023, available in Polish [here](#), 20. NBP, 'Sytuacja życiowa i ekonomiczna migrantów z Ukrainy w Polsce w 2024 r. Raport z badania ankietowego', November 2024, available in Polish [here](#), 15-20.

nationals. Work in accordance with their qualifications was reported by 18% respondents in 2023 and 30% in 2025; work below their qualifications was reported in the cases of 36% respondents in 2023 and 25% in 2025.<sup>391</sup>

According to the UNHCR and Deloitte study of 2025,

Despite significant progress in integrating refugees into the labour market, several challenges persist. Refugees are half as likely to have an employment contract as Polish citizens and few of them achieve high incomes. Although refugees have been moving on to more desirable professions at a faster rate than other groups in the economy, their jobs continue to be disproportionately skewed towards elementary occupations. These issues are most evident among those with university diplomas, but those with below university education also face obstacles.<sup>392</sup>

According to the study on recognition of Ukrainian diplomas and qualifications published in 2025, many Ukrainian nationals struggled with accessing the information needed to effectively start and conclude the recognition procedure in Poland. The most common barriers identified by the respondents included: high costs, protracted and unclear procedures, differences between institutions and lack of support. Despite the difficulties, for many individuals, nostrification provided tangible professional benefits.<sup>393</sup>

### **General temporary protection (until March 2026)**

Third-country nationals enjoying temporary protection under the Act on Protection could work in Poland without any work permit or notification obligation. There were no limitations or additional obligations in this regard. They could also run a business under the rules on business activity applicable to non-Polish nationals.<sup>394</sup>

### **Merged temporary protection (since March 2026)**

#### *New rules*

Under the new Article 116(1) of the Act on Protection and Article 5a of the Migrant Labour Law,<sup>395</sup> temporary protection beneficiaries can work with a work permit in Poland, however, their employer must notify the authorities about their employment within 7 days from the start of work. Thus, the notification procedure described above now applies to all beneficiaries, including general temporary protection beneficiaries who were not burdened with any registration obligations before.

Ukrainian nationals not enjoying temporary protection but staying legally in Poland, until 4 March 2029, can be employed without a work permit, upon notification of their employment.<sup>396</sup>

New rules no longer specify that temporary protection beneficiary cannot be fined if an employer does not respect the notification obligation.

Some facilitations in accessing the labour market remain in force with regard to Ukrainian:

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<sup>391</sup> NBP, 'Sytuacja życiowa i ekonomiczna migrantów z Ukrainy w Polsce w 2025 roku. Raport z badania ankietowego', December 2025, available in Polish [here](#), 21-24.

<sup>392</sup> UNHCR, Deloitte, 'Analysis of the impact of refugees from Ukraine on the economy of Poland', June 2025, available [here](#).

<sup>393</sup> Jan Bazyli Klakla, Zuzanna Stańska, Martyna Gliniecka, Izabela Chałupka-Moszczyńska, Mark Narbut, 'Kwalifikacje ponad granicami: Uznawanie ukraińskich dyplomów i kwalifikacji w Polsce', 2025, available in Polish [here](#).

<sup>394</sup> Article 14 of the Act on Protection, repealed in March 2026. Ustawa z dnia 6 marca 2018 r. o zasadach uczestnictwa przedsiębiorców zagranicznych i innych osób zagranicznych w obrocie gospodarczym na terytorium Rzeczypospolitej Polskiej, available in Polish [here](#).

<sup>395</sup> Ustawa z dnia 20 marca 2025 r. o warunkach dopuszczalności powierzania pracy cudzoziemcom na terytorium Rzeczypospolitej Polskiej.

<sup>396</sup> Article 41 of the Phasing-Out Law.

- a. doctors (Article 50 of the Phasing-Out Law),
- b. nurses and midwives (Article 50 of the Phasing-Out Law),
- c. school teachers' assistants if they know the Polish language (Article 57-57a of the Special Law<sup>397</sup>, depending on the position, until 31 August 2026 and 4 March 2027),
- d. miners (Article 23b of the Special Law, until 4 March 2027).

Temporary protection beneficiaries still can apply in a facilitated manner for a temporary residence permit related to their work or business.<sup>398</sup>

Temporary protection beneficiaries can still register as unemployed persons.<sup>399</sup>

Rules concerning running a business changed as well. Since 5 March 2026, all temporary protection beneficiaries can run a business under the rules on business activity applicable to non-Polish nationals.

### *Transitional provisions*

The previous rules concerning the notification procedure apply to beneficiaries and Ukrainian nationals whose work was notified before the entry into force of the new law.<sup>400</sup>

Special temporary protection beneficiaries who started a business before that date based on more favorable rules provided for in Article 23 of the Special Law, are allowed to continue their activity based on those rules as long as they stay legally in Poland.<sup>401</sup>

The situation of general temporary protection beneficiaries who worked in Poland before March 2026 has not been regulated in the transitional provisions. Thus, it is uncertain whether their continued work must be notified and in what timeframes.

## **2. Access to education**

All children staying in Poland have a constitutional right to education. Education is provided to minor third-country nationals in regular schools and it is not limited by law. In general, temporary protection beneficiaries can benefit from education in public schools under the same conditions as Polish citizens until the age of 18 or the completion of higher school.<sup>402</sup> They can also benefit from additional free Polish language classes and compensatory classes, as well as be supported by a person who knows the language of their country of origin, who can be employed as a teacher's assistant by the director of the school.<sup>403</sup> Preparatory classes can be organised too. For more details about education of third-country nationals in Poland and the intertwined challenges, see [Reception, Access to education](#). The following section describes the specific laws and practices that apply solely to temporary protection beneficiaries.

### **Special temporary protection (until March 2026)**

#### *Children not attending Polish schools*

Until September 2024, many Ukrainian pupils staying in Poland were not attending Polish schools.<sup>404</sup> Instead, they were allowed to participate in online lessons organised by Ukrainian authorities. If that was

<sup>397</sup> Article 57a of the Special Law, in force since 1 September 2024.

<sup>398</sup> Article 45 of the Phasing-Out Law.

<sup>399</sup> Article 1(3) of the Labour Market Law (Ustawa z dnia 20 marca 2025 r.o rynku pracy i służbach zatrudnienia).

<sup>400</sup> Article 40 of the Phasing-Out Law.

<sup>401</sup> Article 42(1) of the Phasing-Out Law.

<sup>402</sup> Article 165 (1) and (2) of Law of 14 December 2016 on education.

<sup>403</sup> Article 165 (8) of the Law of 14 December 2016 on education.

<sup>404</sup> SIP, 'Protection of unaccompanied children from Ukraine in Poland – what should be improved', 6 March 2023, available [here](#). CEO, NRC, 'Uczniowie uchodźczy z Ukrainy w polskim systemie edukacji', October 2023, available in Polish [here](#), 5.

the case, a parent or another guardian had to inform Polish local authorities that a child is continuing education online within the Ukrainian education system.<sup>405</sup>

However, not all parents fulfilled this information obligation.<sup>406</sup> Moreover, some children who were supposed to be attending Ukrainian school online were not going to any school in practice. According to the Ministry of Education and Science, there was no legal possibility to monitor whether children staying in Poland are really attending Ukrainian online schools.<sup>407</sup> Other children tried to attend both Polish in-person and Ukrainian online schools (estimated 15-30%).<sup>408</sup>

In 2022, almost 200,000 new Ukrainian pupils were attending Polish schools, while approx. 500,000 were learning online within the Ukrainian education system.<sup>409</sup> In mid-2023, according to UNHCR and UNICEF, only half of Ukrainian refugee children (nearly 173,000) were enrolled in schools in Poland. Older pupils were less willing to participate in the Polish education system: only around 22% of children at secondary school age attended a Polish school at the end of the 2022/2023 school year. In July 2023, UNHCR and UNICEF published a statement where they encouraged parents to register Ukrainian children in Polish schools and warned that low levels of enrolment could lead to societal exclusion.<sup>410</sup>

In February 2024, Care, IRC, Save the Children and Triangle published a report titled: 'Out of School: Assessment on barriers to school enrolment for Ukrainian refugee adolescents in Poland'.<sup>411</sup> The report identified the main reasons for continuing education within the Ukrainian system and difficulties in accessing Polish education. That included: the hope to continue education in Ukraine, challenges associated with transferring Ukrainian diploma certifications for appropriate placements in the Polish education system, increased crowding in the Polish schools, complications related to the timing of arrival in Poland and enrolment applications per school year, difficulties with understanding of the enrolment procedures, cultural and language barriers, not sufficient support of cultural assistants, challenges in transferring the accreditation of Ukrainian educators to the Polish system, lacking psychosocial support, and high hidden costs of Polish education.

Another study mentioned that some Ukrainian children with disabilities were also excluded from the Polish education system.<sup>412</sup>

In March 2024, the Deputy Polish Ombudsman for Children appealed to the Polish government to include all Ukrainian children into the Polish education system. He indicated that the possibility to choose

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<sup>405</sup> §15 of the Minister of Education and Science on organisation of education and care of children and youth from Ukraine (Rozporządzenie Ministra Edukacji i Nauki z dnia 21 marca 2022 r. w sprawie organizacji kształcenia, wychowania i opieki dzieci i młodzieży będących obywatelami Ukrainy), available in Polish [here](#).

<sup>406</sup> Care, IRC, Save the Children, Triangle, 'Out of School: Assessment on barriers to school enrolment for Ukrainian refugee adolescents in Poland', February 2024, available [here](#), 34-35.

<sup>407</sup> SIP, 'Protection of unaccompanied children from Ukraine in Poland – what should be improved', 6 March 2023, available [here](#). Amnesty International, 'Jesteśmy tutaj razem. Uczniowie i uczennice z Ukrainy w polskich szkołach', 24 January 2023, available in Polish [here](#), 2, 4; Human Rights Commissioner, 'Nierozwiązane problemy edukacji dzieci i młodzieży z Ukrainy. Min. Przemysław Czarnek odpowiada RPO', 31 March and 13 June 2023, available in Polish [here](#). Amnesty International, 'Sytuacja uczniów z Ukrainy w Polsce – odpowiedź Ministerstwa Edukacji i Nauki na petycję Amnesty International', 5 June 2023, available in Polish [here](#).

<sup>408</sup> A. Krajewska, 'Dzieci-uchodźcy z Ukrainy w polskim systemie edukacji', in: M. Fuszara (ed), *Masowa pomoc w masowej ucieczce Społeczeństwo polskie wobec migracji wojennej z Ukrainy*, Warsaw University 2022, available in Polish [here](#), 87-88; UNHCR, 'Wspólny komunikat prasowy UNHCR i UNICEF: Ponad połowa ukraińskich dzieci uchodźców nie jest zapisana do szkół w Polsce', 10 July 2023, available in Polish and English [here](#). UNICEF, Plan International, Save the Children, "It is cool here, no doubt about it... but home is home." Exploring the subjective wellbeing of children and adolescents living in Poland in the face of the war in Ukraine', November 2023, available [here](#), 6. NBP, 'Sytuacja życiowa i ekonomiczna migrantów z Ukrainy w Polsce w 2024 r. Raport z badania ankietowego', November 2024, available in Polish [here](#), 12.

<sup>409</sup> Human Rights Commissioner, 'Okragły stół o oświacie – konsultacje w sprawie edukacji dzieci i młodzieży z Ukrainy w Biurze RPO', 3 June 2022, available in Polish [here](#); Amnesty International, 'Jesteśmy tutaj razem. Uczniowie i uczennice z Ukrainy w polskich szkołach', 24 January 2023, available in Polish [here](#), 4.

<sup>410</sup> UNHCR, 'Wspólny komunikat prasowy UNHCR i UNICEF: Ponad połowa ukraińskich dzieci uchodźców nie jest zapisana do szkół w Polsce', 10 July 2023, available in Polish and English [here](#).

<sup>411</sup> Care, IRC, Save the Children, Triangle, 'Out of School: Assessment on barriers to school enrolment for Ukrainian refugee adolescents in Poland', February 2024, available [here](#).

<sup>412</sup> Fundacja Dajemy Dzieciom Siłę, 'Dzieci się liczą 2022', 2022, available in Polish [here](#), 359-360.

between Ukrainian online lessons and Polish education system “over time ceased to be appropriate to the situation”. Children attending only Ukrainian school are “invisible” to the Polish authorities irrespective of the special needs that they may have.<sup>413</sup>

In May 2024, the Special Law was amended: the rule that the 800+ financial allowance and the “Good Start” allowance are only available for children attending Polish schools or kindergartens was introduced. This change was seen as an introduction of mandatory education for Ukrainian children in Poland by the UNHCR<sup>414</sup> or as a measure leading to unequal treatment by SIP.<sup>415</sup>

From 1 September 2024, only Ukrainian pupils taking the matriculation exam in 2025 within the Ukrainian education system are exempted from the obligation to attend Polish schools.<sup>416</sup> That exemption was not prolonged for the school year 2025/2026.<sup>417</sup> Inclusion of all other children into the Polish education system was generally positively assessed by schools’ management, teachers, parents and children.<sup>418</sup> However, as 50-80,000 new Ukrainian pupils were estimated to start lessons in Polish schools as of September 2024,<sup>419</sup> this change led to further overburdening of the Polish education system.

### *Children attending Polish schools*

In July 2023, UNHCR and UNICEF informed that nearly 173,000, refugee children from Ukraine were at the time enrolled in the Polish school system. ‘In Poland, refugees from Ukraine constitute 4 per cent of all registered students. In more than 85,000 classes there is at least one refugee student’.<sup>420</sup> According to another study, in November 2023, 293,229 children with ‘PESEL UKR’ number were attending Polish schools.<sup>421</sup> Since September 2024, almost all Ukrainian children have been obliged to attend Polish schools (see above). In September 2024, 18,000 new Ukrainian pupils entered the Polish education system.<sup>422</sup> Since September 2025, all Ukrainian children staying in Poland are obliged to attend Polish schools. As of April 2025, there were 203,000 Ukrainian children in Polish schools, including 149,100 pupils who left Ukraine due to the war. They constituted 3% of all pupils.<sup>423</sup> As of 23 February 2026, “out of 261,523 of pupils in Poland with Ukrainian citizenship 186,984 are pupils with PESEL UKR status registrations under temporary protection.”<sup>424</sup>

### *Facilitations and entitlements*

Some special rules were adopted to facilitate coping with the unprecedented challenge of accepting thousands of new Ukrainian pupils to Polish schools, under the Special Law.

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<sup>413</sup> Rzecznik Praw Dziecka, ‘Uczniowie z Ukrainy nie mogą być w Polsce niewidzialni’, 29 March 2024, available in Polish [here](#).

<sup>414</sup> UNHCR, ‘Draft law amending the Act on Assistance to Citizens of Ukraine in the Context of the Armed Conflict in Ukraine (“the Special Act”). UNHCR Comments and Observations’, April 2024, available [here](#), 6.

<sup>415</sup> SIP, ‘The Polish government is working on changes to the Special Act and we reported some comments related to it’, 19 April 2024, available [here](#).

<sup>416</sup> §15 of the Ordinance of the Minister of Education and Science on organisation of education and care of children and youth from Ukraine (Rozporządzenie Ministra Edukacji i Nauki z dnia 21 marca 2022 r. w sprawie organizacji kształcenia, wychowania i opieki dzieci i młodzieży będących obywatelami Ukrainy, hereinafter: the Ukrainian Pupils Ordinance), as in force since 1 September 2024.

<sup>417</sup> HNLAC, ‘Maturzyści z Ukrainy uczący się w ukraińskich szkołach online a obowiązek szkolny w Polsce’, 2025, available in Polish [here](#).

<sup>418</sup> CEO, UNICEF, ‘Uczniowie i uczennice z Ukrainy w polskich szkołach - rok szkolny 2023/2024. Raport z badań jakościowych’, October 2024, available in Polish [here](#), 5.

<sup>419</sup> Rp.pl, ‘Szkoły muszą zmieścić 80 tys. dzieci z Ukrainy’, 26 July 2024, available in Polish [here](#).

<sup>420</sup> UNHCR, ‘Wspólny komunikat prasowy UNHCR i UNICEF: Ponad połowa ukraińskich dzieci uchodźców nie jest zapisana do szkół w Polsce’, 10 July 2023, available in Polish and English [here](#).

<sup>421</sup> Care, IRC, Save the Children, Triangle, ‘Out of School: Assessment on barriers to school enrolment for Ukrainian refugee adolescents in Poland’, February 2024, available [here](#), 22.

<sup>422</sup> CEO, ‘Foreign students in Polish schools in the 2024/2025 school year Data analysis report. Data as of April 2025’, available [here](#).

<sup>423</sup> Ibid, 52.

<sup>424</sup> Council of Europe Directorate of human rights division on migration and refugees, *Report on the mission to Poland*, 4 – 5 February 2026, 1 April 2026, available [here](#), 9.

- ❖ The possibility to organise interschool preparatory classes, interschool additional Polish language lessons and lessons outside of schools was introduced in the Special Law for special temporary protection beneficiaries (Articles 51, 55 and 55b until 31 August 2026). Organising and attending preparatory classes is recommended by the Ministry of Education,<sup>425</sup> but this solution is increasingly criticised.<sup>426</sup>
- ❖ Ukrainian children attending preparatory classes might have not been subject to yearly or mid-term assessments (until the school year 2024/2025).<sup>427</sup>
- ❖ Polish language lessons for Ukrainian children are conducted individually or in groups of up to 15 children. They should participate in those lessons for no less than 6 hours/week (in the school years 2022/2023-2023/2024), 4 hours/week (in school year 2024/2025) and 2 hours/week (in school year 2025/2026, until 31 August 2026).<sup>428</sup> Since September 2024, Ukrainian pupils who started education in Poland in the school year 2022/2023 or 2023/2024 can benefit from additional Polish language lessons for 36 months instead of 24 (Article 55b(1a)).
- ❖ The limit for the maximum number of children in a class was increased if Ukrainian children were attending the class (until the school year 2024/2025).<sup>429</sup>
- ❖ Some special rules concerning the participation of Ukrainian pupils in final exams and as regards ending school were established.<sup>430</sup>
- ❖ In schools, where an additional class was established to provide education to Ukrainian pupils, teachers were given the possibility to work overtime (Article 56, until 31 August 2026). The same applies to Polish language teachers in all schools (Article 56a, until 31 August 2026).
- ❖ Non-Polish teachers' assistants have been allowed to perform their tasks in Polish schools if they know the Polish language (Article 57, until 31 August 2026).
- ❖ Additional state funding for schools has been provided for in the Special Law, in Articles 50-50c. Since January 2023, local authorities could also receive additional funding for learning materials for Ukrainian children.<sup>431</sup>
- ❖ Special temporary protection beneficiaries were entitled to the 'Good start' allowance, i.e. PLN 300 for every child at the beginning of the school year. A lower fee for a nursery or daycare was offered until 1 October 2024. Since then only some support for parents with children up to 3 years old was available.<sup>432</sup> A minor special temporary protection beneficiary could also receive social welfare for pupils (Article 53, until 4 March 2026).
- ❖ A free-of-charge transport of minor special temporary protection beneficiaries to schools or other places where education or childcare is provided may be organised by local authorities (Article 52, until 31 August 2026).
- ❖ Some new rules have been established to facilitate the creation of nurseries by local authorities (Article 28, until 31 December 2025).
- ❖ Since 1 September 2024, schools can additionally hire an intercultural assistant to support foreign pupils' contacts within the school environment and cooperate with their teachers and parents.<sup>433</sup>

<sup>425</sup> Ministry of Education, 'Organizacja kształcenia dzieci z zagranicy - list Minister Edukacji Barbary Nowackiej do kuratorów oświaty, dyrektorów, nauczycieli, organów prowadzących, 16 August 2024, available in Polish [here](#).

<sup>426</sup> CEO, UNICEF, 'Uczniowie i uczennice z Ukrainy w polskich szkołach - rok szkolny 2023/2024. Raport z badań jakościowych', October 2024, available in Polish [here](#), 4.

<sup>427</sup> §6b of the the Ukrainian Pupils Ordinance.

<sup>428</sup> §11a, §11ab and §11ac *ibid*.

<sup>429</sup> §7-11 *ibid*.

<sup>430</sup> §2-§6 and §6c-§6f *ibid*; Articles 58b and 58c of the Special Law, in force since 1 July 2024, repealed in March 2026. For problems in this regard, see Human Rights Commissioner, 'Co z egzaminami ósmoklasisty dla dzieci z Ukrainy – pytał RPO. MEiN: będą ułatwienia i dostosowania', 13 April and 18 May 2022, available in Polish [here](#).

<sup>431</sup> Article 50b of the Special Law, repealed in March 2026.

<sup>432</sup> Article 26(1)<sup>(3)</sup> and (5-6) of the Special Law, repealed in March 2026.

<sup>433</sup> Article 165(8a) of the Law of 14 December 2016 on education, in force since 1 September 2024. See also Ministry of Education, 'Organizacja kształcenia dzieci z zagranicy - list Minister Edukacji Barbary Nowackiej do kuratorów oświaty, dyrektorów, nauczycieli, organów prowadzących, 16 August 2024, available in Polish [here](#).

As of April 2025, 2.6% of Ukrainian pupils participated in preparatory classes (3,900). 48% of Ukrainian pupils who left Ukraine since 2022 participated in additional Polish language classes.<sup>434</sup>

At the end of 2023, the Supreme Audit Office positively assessed the legal solutions adopted to include Ukrainian pupils into the Polish education system.<sup>435</sup> In 2025, the Children Rights Ombudsman also praised the educational opportunities available for Ukrainian pupils, in particular additional Polish language classes and compensatory lessons as well as preparatory classes. The Ombudsman called for the Ministry of Education to control how those opportunities are used in practice by schools and to share the gathered information with the Ombudsman. As of February 2026, the request remained unanswered,<sup>436</sup> probably due to the lack of the needed data within the Ministry.

In 2025, the government started a project “Friendly school” aimed at supporting Ukrainian pupils within the Polish education system by hiring more school assistants, providing more training to teachers and increasing psychological assistance in schools.<sup>437</sup> The adoption of the program was generally assessed positively, however, its significantly delayed start and last-minute changes were criticised.<sup>438</sup>

### Challenges

The Polish educational system struggled with admitting such a great number of new foreign pupils. In 2022, the main problems included: the schools’ overcrowding; not a sufficient number of schools and teachers; the lack of sufficient support for teachers in teaching the Polish language as a second language; the lack of adequate handbooks; difficulties in hiring Ukrainian teachers; the lack of means to support Ukrainian pupils in their online learning.<sup>439</sup> Hate speech and violence towards Ukrainian pupils were also reported.<sup>440</sup> Moreover, Ukrainian children often unexpectedly disappeared from the Polish education system, when they moved back to Ukraine or travelled to another state. Furthermore, teachers and schools were not sufficiently supported by the state.<sup>441</sup>

In June 2022, the Polish Teachers’ Union (PTU) called on the Polish Prime Minister to take actions needed for the proper functioning of the Polish education system which has been overburdened after the admission of new Ukrainian pupils. It alarmed that the system was already inefficient. Over 80% of Ukrainian children joined regular classes, not the preparatory ones. In some classes, 50% of pupils were Ukrainian, and 50% Polish; thus, the education was in practice bilingual, provided with the assistance of online translation tools. It was impossible to implement the curriculum in those circumstances, both for

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<sup>434</sup> CEO, ‘Foreign students in Polish schools in the 2024/2025 school year Data analysis report. Data as of April 2025’, available [here](#).

<sup>435</sup> Supreme Audit Office, ‘Kształcenie dzieci cudzoziemców w polskich szkołach’, December 2023, available in Polish [here](#), 8.

<sup>436</sup> Rzecznik Praw Dziecka, ‘Wszyscy uczniowie w polskim systemie oświaty mają równe szanse’, 21 September 2025, available in Polish [here](#). Rzecznik Praw Dziecka, ‘Równe szanse dla wszystkich uczniów. Ponowny apel RPD do MEN’, 12 January 2026, available in Polish [here](#).

<sup>437</sup> Ministry of Education, ‘Rusza rządowy program wyrównywania szans edukacyjnych „Przyjazna szkoła” na lata 2025-2027 finansowany ze środków UE’, 15 July 2025, available in Polish [here](#).

<sup>438</sup> K. Garbicz, ‘Program „Przyjazna szkoła” wreszcie ruszył, choć z ocenionym nazewnictwem’, 24 July 2025, available in Polish [here](#).

<sup>439</sup> Human Rights Commissioner, ‘Okragły stół o oświacie – konsultacje w sprawie edukacji dzieci i młodzieży z Ukrainy w Biurze RPO’, 3 June 2022, available in Polish [here](#), Ministry of Education and Science, Systemowe wsparcie obywateli Ukrainy – konferencja prasowa w KPRM z udziałem ministra Przemysława Czarka, 24 May 2022, available in Polish [here](#).

<sup>440</sup> A. Gmiterek-Zabłocka, ‘Coraz częściej słyszę o wyzwiskach i mowie nienawiści w szkołach’. Pomóc mają specjaliści asystenci, Tok.fm, 7 June 2022, available [here](#) in Polish. HNLAC, ‘Przemoc fizyczna i psychiczna wobec uczniów z Ukrainy: Poradnik dla uczniów, rodziców i nauczycieli’, available in Polish [here](#). Amnesty International, ‘Jesteśmy tutaj razem. Uczniowie i uczennice z Ukrainy w polskich szkołach’, 24 January 2023, available in Polish [here](#), 14-15.

<sup>441</sup> A. Krajewska, ‘Dzieci-uchodźcy z Ukrainy w polskim systemie edukacji’, in: M. Fuszara (ed), *Masowa pomoc w masowej ucieczce Społeczeństwo polskie wobec migracji wojennej z Ukrainy*, Warsaw University 2022, available in Polish [here](#), 81, 91; Amnesty International, ‘Jesteśmy tutaj razem. Uczniowie i uczennice z Ukrainy w polskich szkołach’, 24 January 2023, available in Polish [here](#), 2.

Polish and Ukrainian children. The PTU noticed also that teachers must work over their usual hours to be able to teach children not knowing the Polish language.<sup>442</sup>

Despite the PTU's recommendation to create more preparatory classes, their number decreased in the school year 2022/2023 in comparison with the preceding year. In the year 2021/2022, there were 2,414 such classes organised in Poland that were benefited by 38,000 children. In the year 2022/2023, only 956 preparatory classes were organised for 15,000 Ukrainian nationals.<sup>443</sup> On the other hand, more teacher's assistants seem to be hired. For example, over 200 Ukrainian and Belarusian assistants were reported to work in Warsaw schools as of June 2022, which constitutes a major increase in comparison to 2021.<sup>444</sup> In Lublin, 64 Ukrainian teachers started to work as teacher assistants in 41 schools.<sup>445</sup> However, the number of those assistants is still insufficient taking into account the great number of new Ukrainian pupils.<sup>446</sup> The abovementioned problems continued in 2023. In October 2023, only 288 preparatory classes were organised for 3,700 pupils. In some voivodeships, there were no preparatory classes organised.<sup>447</sup> Moreover, Care, IRC, Save the Children and Triangle noticed that: 'While some schools are staffed with cultural assistants by the municipality, the majority of local education authorities do not have the budget to cover the costs of supporting the number of students needing cultural assistance and rely on external funding from INGOs — both of which result in staffing that is disproportionate to need. In some instances, Ukrainian teachers volunteer their time to support the students, without financial support'.<sup>448</sup>

In March 2023, the Human Rights Commissioner intervened before the Ministry of Education and Science, asking for better support for Ukrainian pupils. He noticed, *inter alia*, that many children are not attending any school, there is an insufficient number of preparatory classes (only 8% of Ukrainian children enrolled in these classes, according to the Commissioner), schools are overcrowded, insufficient number of cultural assistants and psychosocial support, bullying and discrimination. According to the teachers, the biggest challenge they face is a language barrier and dealing with war-traumatised children.<sup>449</sup>

In October 2023, according to the Civic Education Centre's study, only 53% of Ukrainian pupils who fled Russian invasion were enrolled at Polish schools. 4,500 Ukrainian pupils in the secondary school age did not continue learning in the next class: due to leaving Poland, lack of promotion or resigning from participating in the Polish education system. According to this study, only 3% of Ukrainian children who fled the Russian invasion are enrolled at preparatory classes. The report also confirmed the decreasing number of preparatory classes.<sup>450</sup>

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<sup>442</sup> Polish Teachers' Union, 'Interwencja ZNP: Wniosek do premiera o wprowadzenie specjalnych rozwiązań dot. kształcenia uchodźców', 2 June 2022, available in Polish [here](#). See also: A. Krajewska, 'Dzieci-uchodźcy z Ukrainy w polskim systemie edukacji', in: M. Fuszara (ed), *Masowa pomoc w masowej ucieczce Społeczeństwo polskie wobec migracji wojennej z Ukrainy*, Warsaw University 2022, available in Polish [here](#), 85-87.

<sup>443</sup> Amnesty International, 'Jesteśmy tutaj razem. Uczniowie i uczennice z Ukrainy w polskich szkołach', 24 January 2023, available in Polish [here](#), 8.

<sup>444</sup> A. Gmiterek-Zabłocka, 'Coraz częściej słyszę o wywiskach i mowie nienawiści w szkołach'. Pomóc mają specjaliści asystenci, Tok.fm, 7 June 2022, available [here](#) in Polish. A. Mikulska, 'Lekcje polskiego to nie wszystko. Jak zadbać o integrację dzieci z Ukrainy?', OKO.PRESS, 21 March 2022, available in Polish [here](#).

<sup>445</sup> A. Dąbrowska, 'Lublin Social Committee to Aid Ukraine. 90 days of assistance. Report', available in English [here](#), 8.

<sup>446</sup> A. Krajewska, 'Dzieci-uchodźcy z Ukrainy w polskim systemie edukacji', in: M. Fuszara (ed), *Masowa pomoc w masowej ucieczce Społeczeństwo polskie wobec migracji wojennej z Ukrainy*, Warsaw University 2022, available in Polish [here](#), 92; Amnesty International, 'Jesteśmy tutaj razem. Uczniowie i uczennice z Ukrainy w polskich szkołach', 24 January 2023, available in Polish [here](#), 9-11.

<sup>447</sup> CEO, NRC, 'Uczniowie uchodźczy z Ukrainy w polskim systemie edukacji', October 2023, available in Polish [here](#), 5, 18, 21-24.

<sup>448</sup> Care, IRC, Save the Children, Triangle, 'Out of School: Assessment on barriers to school enrolment for Ukrainian refugee adolescents in Poland', February 2024, available [here](#), 36. See also L. Lukianova, 'Ukraińscy migranci wojenni na polskim rynku pracy. Szanse i ograniczenia', Rynek Pracy 187(4), available in Polish [here](#), 72.

<sup>449</sup> Human Rights Commissioner, 'Nierozwiązane problemy edukacji dzieci i młodzieży z Ukrainy. Min. Przemysł Czarnek odpowiada RPO', 31 March and 13 June 2023, available in Polish [here](#).

<sup>450</sup> CEO, NRC, 'Uczniowie uchodźczy z Ukrainy w polskim systemie edukacji', October 2023, available in Polish [here](#), 5, 18, 21-24.

In the similar study published in October 2024, the Civic Education Centre indicated that presence of Ukrainian pupils in Polish schools had been “normalised” in the school year 2023/2024. Children understand better the formal and informal school rules and communicate better in Polish. However, Ukrainian pupils integrated into the Polish society are in the minority due to the lack of proper actions of schools and national authorities. Ukrainian children still are subjected to discrimination and assimilation – rather than integration - activities. Organising preparatory classes is increasingly criticised due to the intertwined isolation of Ukrainian pupils from Polish children, slower language acquisition, too heavy teachers’ workload, and organisational difficulties. Also supplementary lessons in Polish language are criticised as not fulfilling their role: children of different ages participate in those classes, teachers qualified to teach Polish as a second language are lacking, and the classes are organised very early in the morning or after the school day which is inconvenient for pupils. Teachers are not qualified to deal with war trauma and lack competence in the multicultural education.<sup>451</sup>

Peer violence, bullying, harassment and discrimination against Ukrainian pupils continued to be a problem in 2023 and 2024.<sup>452</sup> For example, Nomada and DRC reported in their study concerning the Lower Silesian Voivodeship that the cases of bullying were mentioned by the overwhelming majority of the respondents. The teachers often did not react or themselves contributed to the hate speech at school.<sup>453</sup> IRC indicated that the problem of bullying of Ukrainian children intensified in 2024<sup>454</sup> and continued in 2025.

Accessing public kindergartens was also hampered in 2022-2025 due to the lack of spaces (a problem faced by Polish nationals as well).<sup>455</sup>

### *Vulnerable pupils*

In August 2022, the Human Rights Commissioner appreciated the Ministry of Education and Science’s information for Ukrainian parents of children with special educational needs about their rights in Poland. However, he noticed that interpreters of the Ukrainian language are urgently needed to support the work of Polish psychologists, psychotherapists, speech therapists and other specialists working in schools.<sup>456</sup> Moreover, schools for deaf pupils were reported to be unable to cope with the challenge of accepting new children from Ukraine.<sup>457</sup>

In 2024, Care, IRC, Save the Children and Triangle noticed a particularly problematic situation of unaccompanied children from Ukrainian foster care who stayed in Poland in special accommodation centres (of whom some had disabilities). ‘Education delivery in these centres varies widely, influenced by factors such as the specific needs and disability status of the children, the geographical location of the centres, and the availability of staff. Unfortunately, this variability often leads to situations where children have limited or no access to educational opportunities that are adequately tailored to their needs. This issue is particularly acute for children with high support needs or severe disabilities, who are frequently excluded from any learning opportunities. Furthermore, these children find themselves in a state of extreme isolation, caught between two child protection systems and unable to fully benefit from either.

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<sup>451</sup> CEO, UNICEF, ‘Uczniowie i uczennice z Ukrainy w polskich szkołach - rok szkolny 2023/2024. Raport z badań jakościowych’, October 2024, available in Polish [here](#), 4-7.

<sup>452</sup> See e.g. *ibid.*, 37; PIE, ‘Uchodźcy z Ukrainy na polskim rynku pracy: możliwości i przeszkody’, December 2023, available in Polish [here](#), 22; UNICEF, Plan International, Save the Children, “It is cool here, no doubt about it... but home is home.” Exploring the subjective wellbeing of children and adolescents living in Poland in the face of the war in Ukraine’, November 2023, available [here](#), 6; IRC, ‘Child Protection Monitoring Report (June - September 2023)’, December 2023, available [here](#), 12-13.

<sup>453</sup> Nomada, DRC, ‘Poland. Protection Monitoring Analysis. Lower Silesian Voivodeship’, November 2023, available [here](#), 13.

<sup>454</sup> IRC, ‘Raport monitorujący sytuację dzieci uchodźczych z Ukrainy 2024: styczeń-czerwiec’, available in Polish [here](#), 6.

<sup>455</sup> UNHCR, ‘Poland: Joint Protection Analysis’, October 2023, available [here](#), 13.

<sup>456</sup> Human Rights Commissioner, ‘Ukraińscy uczniowie z niepełnosprawnościami wymagają wsparcia. RPO pisze do MEiN’, 20 August 2022, available in Polish [here](#).

<sup>457</sup> Human Rights Commissioner, ‘Telewizja bez barier i pomoc głuchym uchodźcom z Ukrainy - posiedzenie Komisji Ekspertów ds. Osób Głuchych’, 21 April 2022, available in Polish [here](#).

This predicament arises from the absence of a solid legal and political framework facilitating cooperation between the Polish and Ukrainian governments'.<sup>458</sup>

### *Adults*

Until 1 June 2025, Ukrainian doctors, dentists, nurses and midwives could have their Polish language lessons co-financed from a state budget (Article 22i of the Special Law).

Until 4 March 2026, Ukrainian students enjoying special temporary protection in Poland could apply for a social scholarship and student loan (Article 41(10-12) of the Special Law). Moreover, they could be admitted to study in Poland without proper documentation confirming their education progress in Ukraine, upon verification of their achieved learning outcomes (if they studied on 24 February 2022 in Ukraine, Article 45, repealed in March 2026).

### **General temporary protection (until March 2026)**

Under the Act on Protection, until March 2026, temporary protection beneficiaries could benefit from Polish language lessons and materials, as well as didactic materials for children attending schools.<sup>459</sup> This was the only special rule as regards education provided in the law concerning general temporary protection beneficiaries.

In 2022, 51 general temporary protection beneficiaries received assistance only in the form of Polish language lessons and materials (as of 31 December 2022, 17 persons).<sup>460</sup> The data for 2023 are not available, however, as of 31 December 2023, 24 temporary protection beneficiaries received assistance only in the form of Polish language lessons and materials.<sup>461</sup> In 2024, 20 general temporary protection beneficiaries received assistance only in the form of Polish language lessons and materials. As of 31 December 2024, 1 person received such an assistance.<sup>462</sup> Data concerning 2025 were not shared.

### **Merged temporary protection (since March 2026)**

Currently, no provision in the Act on Protection, concerns access to education for temporary protection beneficiaries. However, some rules in this regard provided for in the Special Law and in the Ukrainian Pupils Ordinance remained in force, mostly until 31 August 2026 (see above). General temporary protection beneficiaries no longer can benefit from Polish language lessons and materials, as well as didactic materials for children attending schools.

## **F. Social welfare**

### **Special temporary protection (until March 2026)**

#### *Entitlements*

Special temporary protection beneficiaries had access to social welfare in Poland. This access was largely granted in February 2022 and since then has been increasingly limited.<sup>463</sup>

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<sup>458</sup> Care, IRC, Save the Children, Triangle, 'Out of School: Assessment on barriers to school enrolment for Ukrainian refugee adolescents in Poland', February 2024, available [here](#), 36.

<sup>459</sup> Article 112(6)<sub>(2-3)</sub> of the Act on Protection.

<sup>460</sup> Information provided by the Office for Foreigners, 17 January 2023.

<sup>461</sup> Information provided by the Office for Foreigners, February 2024.

<sup>462</sup> Information provided by the Office for Foreigners, 14 March 2025.

<sup>463</sup> M. Lysienia and S. Kurt, 'Evolving legal precarity? The case of persons displaced from Ukraine', Jusletter, 14 April 2025, available in English [here](#).

Until 1 July 2024, a special temporary protection beneficiary having a PESEL number was entitled to a one-time financial allowance – PLN 300 (300+ benefit).<sup>464</sup> However, in May 2024, the Special Law was changed and such a benefit can now be only granted if a special ordinance is adopted in case of a mass influx to Poland of Ukrainian nationals (Article 31<sup>1</sup> of the Special Law, in force from 1 July 2024 until 4 March 2026). No such ordinance has been adopted.

Moreover, special temporary protection beneficiaries, having a PESEL number and staying in Poland with children, were, *inter alia*, entitled to benefits generally available to Polish citizens, i.e.:<sup>465</sup>

1. Family benefits, specified in the 2003 Law on family benefits,<sup>466</sup>
2. 800+ financial allowance (since 1 January 2024, until the end of 2023: 500+ allowance) – for every Ukrainian child under 18 years old having a PESEL number: PLN 800 per month. In May 2024, the respective law was changed and this benefit has been made available only if a child attends a Polish school or kindergarten. As of January 2025, 209,000 children with PESEL UKR were receiving this support (out of over 400,000 staying in Poland).<sup>467</sup> In February 2026, the law was changed again: in addition to the school requirement, being active on the labour market was required from the parents to be eligible for this 800+ allowance.<sup>468</sup> That change was forced by the new Polish President who vetoed the law extending the duration of special temporary protection beyond 30 September 2025 due to the fact that the Ukrainian nationals' access to the 800+ allowance was (initially) not limited.<sup>469</sup>
3. 'Good start' allowance: PLN 300 at the beginning of the school year (for more on financial support for pupils, see [Access to education](#)). In May 2024, the respective law was changed and this benefit was available until 4 March 2026 only if a child attended a Polish school.
4. "Active in nursery" allowance – available since October 2024 (until 4 March 2026), only for parents and small children staying in Poland longer than 365 days.

The general rules regarding those benefits applied to special temporary protection beneficiaries (the same as for Polish citizens), with some minor exceptions. For example, concerning the benefits that are dependent on the financial situation of the beneficiary (some of the above-mentioned allowances), the income of their family member who is not staying in Poland (e.g. because they stayed in Ukraine) was not taken into account.<sup>470</sup> Some of those benefits were also granted to temporary guardians.<sup>471</sup> Since 28 January 2023, the Special Law specified that the benefits were suspended if a person concerned left Poland, but might have been paid upon return to Poland.<sup>472</sup>

Furthermore, special temporary protection beneficiaries, having a PESEL number, could be granted financial and non-financial benefits following the 2004 Law on social assistance.<sup>473</sup> It was dependent on the financial situation of the person/family concerned. The general rules regarding those benefits applied to special temporary protection beneficiaries (the same as for Polish citizens).

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<sup>464</sup> Article 31 of the Special Law, repealed in July 2024. For more information, see SIP, UNHCR, 'Świadczenia dla obywateli i obywaterek Ukrainy przybyłych do Polski po 24 lutego 2022 r.' (2023), available in Polish and Ukrainian [here](#).

<sup>465</sup> Article 26 of the Special Law, repealed in March 2026.

<sup>466</sup> Ustawa z dnia 28 listopada 2003 r. o świadczeniach rodzinnych, available in Polish [here](#).

<sup>467</sup> 'Stanowisko Fundacji „Ukraiński Dom” w sprawie zmian zasad wsparcia „800+” dla uchodźców wojennych z Ukrainy', 3 lutego 2025 r., available in Polish [here](#).

<sup>468</sup> Article 26(1a) Special Law, in force from 1 February until 4 March 2026. See also Ministry of Interior and Administration, 'Rząd uszczelnia system - świadczenia tylko dla pracujących cudzoziemców - prezydent podpisał ustawę', 26 September 2025, available in Polish [here](#); HNLAC, 'Nowe zasady przyznawania 800+ dla obywateli Ukrainy ze statusem UKR od 1 lutego', available in Polish [here](#).

<sup>469</sup> Polish President, 'Prezydent zawetował m.in. nowelizację ustawy o pomocy obywatelom Ukrainy', 25 August 2025, available in Polish [here](#). D. Sitnicka, 'Ograniczenia w 800 plus i dostępie do leczenia dla cudzoziemców. Rząd ugiął się po wecie prezydenta', 10 September 2025, available in Polish [here](#).

<sup>470</sup> Article 26(2) of the Special Law, repealed in March 2026.

<sup>471</sup> Article 26(4-4f) of the Special Law, repealed in March 2026.

<sup>472</sup> Article 26(3g-3h) of the Special Law, repealed in March 2026.

<sup>473</sup> Article 29 of the Special Law, repealed in March 2026, Ustawa z dnia 12 marca 2004 r. o pomocy społecznej, available in Polish [here](#).

Special temporary protection beneficiaries could also benefit from food aid within the Fund for European Aid to the Most Deprived (since 1 July 2024, EU funds for food assistance).<sup>474</sup> Moreover, until December 2023, UNHCR, in cooperation with the Polish government, offered special financial support to persons fleeing Ukraine.<sup>475</sup>

In 2023-2025, the Polish National Bank presented its own studies on the economic situation of Ukrainian nationals who fled Russian invasion. In 2023, 53% of respondents declared benefitting from social welfare in Poland. 500+ allowance was the most popular with 44% of respondents reporting that they received it.<sup>476</sup> In 2024, 52% of respondents benefitted from social welfare with 41% receiving the 800+ allowance.<sup>477</sup> In 2025, 50% received some social welfare benefits with 39% benefitting from the 800+ allowance.<sup>478</sup>

### *Hampered access*

Ukrainian nationals and their family members have reported experiencing some difficulties in practice with regard to the aforementioned allowances. According to the Human Rights Commissioner, obtaining a PESEL number by Ukrainian nationals and members of their family in 2022 was sometimes possible only after a long waiting period. It hampered their possibility of accessing social welfare.<sup>479</sup>

In 2023, the cases of denying access to the benefits provided for in the 2003 Law on family benefits to some adult temporary protection beneficiaries staying in Poland were reported due to the misleading formulation of Article 26(1)(1) of the Special Law. It states that Ukrainian nationals are entitled to family benefits if they stay in Poland with children. However, not all “family benefits” are intertwined with childcare. For example, some elderly temporary protection beneficiaries were refused a care allowance. The Human Rights Commissioner intervened, which led to the Ministry of Family and Social Policy’s statement that elderly Ukrainian nationals staying in Poland without children are not excluded from receiving this allowance.<sup>480</sup> This issue was also considered by the courts, who took the same approach to eligibility for a care allowance, e.g. with regard to adult persons with disabilities enjoying temporary protection in Poland, but not having any children.<sup>481</sup> As the formulation in Article 26(1)(1) has not changed, this remained an issue in 2024-2025.

Furthermore, as noticed by SIP, ‘(a)nother problem reported by the temporary protection beneficiaries is the lack of access to family benefits when a child has a Ukrainian nationality and accordingly the ‘PESEL UKR’ (so temporary protection based on the Special Law), but their parent is not a Ukrainian national and was granted temporary protection on the basis of the Act on Protection. The access to family benefits is regulated differently for these two groups of temporary protection beneficiaries. Thus, in the above circumstances, despite the fact that the real beneficiary of the family benefits is the child itself, their parent is not entitled to ask for these benefits (e.g. Provincial Administrative Court in Gliwice, judgment of 24 August 2023, no. II SA/GI 869/23, not final)’<sup>482</sup>.

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<sup>474</sup> Article 33 of the Special Law, repealed in March 2026.

<sup>475</sup> UNHCR Polska, ‘UNHCR i Rząd RP łączą siły, żeby wesprzeć finansowo uchodźców z Ukrainy’, 11 March 2022, available in Polish [here](#). See also, [here](#).

<sup>476</sup> Narodowy Bank Polski (NBP), *Sytuacja życiowa i ekonomiczna migrantów z Ukrainy w Polsce w 2023 roku. Raport z badania ankietowego*, December 2023, available in Polish [here](#).

<sup>477</sup> NBP, *‘Sytuacja życiowa i ekonomiczna migrantów z Ukrainy w Polsce w 2024 r. Raport z badania ankietowego’*, November 2024, available in Polish [here](#), 21-22.

<sup>478</sup> NBP, *‘Sytuacja życiowa i ekonomiczna imigrantów z Ukrainy w Polsce w 2025 r. Raport z badania ankietowego’*, 2025, available in Polish [here](#), 29-30.

<sup>479</sup> Human Rights Commissioner, *‘Kolejki po PESEL przyczyną nierównego dostępu uchodźców do świadczeń. RPO pisze do minister Małag. Resort odpowiada’*, 6 and 29 April 2022, available in Polish [here](#). SIP, *Submission to ECRI*, 15 June 2022, available in English [here](#), 7.

<sup>480</sup> Human Rights Commissioner, *‘Kłopoty obywateli Ukrainy z zasiłkiem pielęgnacyjnym. Skuteczna interwencja Biura RPO’*, 23 October 2023, available in Polish [here](#).

<sup>481</sup> See e.g. Provincial Administrative Court in Gorzów Wielkopolski, judgment of 29 November 2023, no. II SA/Go 608/23; Provincial Administrative Court in Wrocław, judgment of 29 May 2024, no. IV SA/Wr 545/23.

<sup>482</sup> SIP, *‘Input to the EUAA Asylum Report 2024’*, November 2023, available [here](#), 19.

Moreover, as already mentioned above (see [Movement and mobility](#)), many persons had their temporary protection terminated, so lost their access to social welfare benefits, due to the “30-day absence in Poland” rule – even when they never left Poland (at all or for more than 30 days).<sup>483</sup>

According to the official data published in July 2023, “500+” allowance was ceased from 1 June 2022 to 31 May 2023 in case of approx. 140,000 Ukrainian nationals. Only in the first 14 days of June 2023, another 1,310 persons lost a right to receive this benefit.<sup>484</sup> In the period of 1 June and 25 October 2023, social benefits were ceased in 13,000 cases due to the lack of return to Poland within 30 days from the day of the departure.<sup>485</sup> It is unknown how many of these people really left Poland for more than 30 days and how many of those decisions are based on the incorrect data in the special registry run by the Border Guard (see [Movement and mobility](#)).<sup>486</sup> However, in 2023-2025, NGOs were often informed about the instances of the social benefits’ refusals/cessations despite the lack of absence in Poland for more than 30 days.<sup>487</sup> ACAPS estimated in November 2023 that ‘several thousand refugees from Ukraine benefitting from temporary protection (TP) status in Poland have lost this status without meeting legal criteria for its revocation’.<sup>488</sup>

Furthermore, as indicated by SIP:<sup>489</sup>

since the amendments of the law in January 2023, any departure from Poland of a temporary protection beneficiary or their child leads to the suspension of payment of social benefits. If that beneficiary or child returns to Poland, the benefits should be reinstated retroactively, unless a person concerned is no longer entitled to receive them.<sup>490</sup> However, in practice, social benefits are often not reinstated. SIP provided legal assistance in a case where a Ukrainian national was absent from Poland for three hours and her social benefits were firstly suspended, then ceased (...). In fact, the introduction of the abovementioned rules led to thousands of suspensions of social benefits across Poland.

According to media reports, in 2023, payments of the 500+ benefit were suspended in the cases of 18,000 Ukrainian nationals within a span of just over two months.<sup>491</sup> According to the Social Security Institution (ZUS), in the period of 1 June and 25 October 2023, social benefits were suspended in 35,000 cases, restored in 14,000 cases and ceased in 13,000 cases due to the lack of return to Poland in 30 days.<sup>492</sup> In 2024 and 2025, the suspensions continued and a restoration of benefits was often very complicated and protracted.<sup>493</sup>

As explained by SIP:

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<sup>483</sup> See e.g. Human Rights Commissioner, ‘Uchodźcy z Ukrainy tracą status UKR, a wraz z nim - prawo do świadczeń wychowawczych. Wyjaśnienia ZUS’, 2 August, 26 October, 24 November 2023, available in Polish [here](#). Human Rights Commissioner, ‘Problemy ze statusem UKR uchodźców wojennych z Ukrainy. Odpowiedź MSWiA’, 4 July and 26 August 2024, available in Polish [here](#).

<sup>484</sup> Ministry of Family and Social Affairs, ‘Odpowiedź na interpelację nr 40924 w sprawie problemów obywateli Ukrainy dotyczących nieuzasadnionej utraty świadczenia wychowawczego’, 7 July 2023, available in Polish [here](#).

<sup>485</sup> Human Rights Commissioner, ‘Uchodźcy z Ukrainy tracą status UKR, a wraz z nim - prawo do świadczeń wychowawczych. Wyjaśnienia ZUS’, 2 August, 26 October, 24 November 2023, available in Polish [here](#).

<sup>486</sup> SIP, ‘Input to the EUAA Asylum Report 2024’, November 2023, available [here](#), 18.

<sup>487</sup> See e.g. Ibid.; UNHCR, ‘Poland: Joint Protection Analysis’, October 2023, available [here](#), 9; HNLAC, ‘Instrukcja wznowienia świadczenia wychowawczego 500+ dla rodziców dzieci z Ukrainy’, 20 November 2023, available in Polish [here](#).

<sup>488</sup> ACAPS, ‘Poland: Loss of temporary protection status and social benefits for Ukrainian refugees’, 14 November 2023, available [here](#), 1, 7.

<sup>489</sup> SIP, ‘Input to the EUAA Asylum Report 2024’, November 2023, available [here](#), 18-19.

<sup>490</sup> Article 26 (3g-3i) of the Special Law.

<sup>491</sup> PAP, ‘ZUS wstrzymał kilkanaście tysięcy świadczeń dla uchodźców z Ukrainy, którzy wyjechali z Polski’, 22 August 2023, available in Polish [here](#).

<sup>492</sup> Human Rights Commissioner, ‘Uchodźcy z Ukrainy tracą status UKR, a wraz z nim - prawo do świadczeń wychowawczych. Wyjaśnienia ZUS’, 2 August, 26 October, 24 November 2023, available in Polish [here](#).

<sup>493</sup> Fundacja Ukraiński Dom, Biuletyn Domu Ukraińskiego nr 1-2, April 2024, available in Polish [here](#), 3.

'(t)he Social Security Institution (ZUS) suspends and ceases social benefits on the basis of the information provided for in the special registry run by the Border Guard, which it seems to consider binding.<sup>494</sup> Other proofs – confirming absences shorter than 30 days – are often ignored by this institution. There is no coherent jurisprudence in this regard: some courts reproach ZUS for ignoring evidence (e.g. Provincial Administrative Court in Lublin, judgment of 2 February 2023, no. II SA/Lu 877/22), while others indicate that its actions were correct (e.g. Provincial Administrative Court in Gliwice, judgment of 26 May 2023, no. II SA/GI 90/23).<sup>495</sup>

The latter judgment was questioned before the Supreme Administrative Court which, in a judgment of 13 September 2024, no. I OSK 2263/23, indicated that benefits are granted to special temporary protection beneficiaries based on the applicants' legal status rather than the record of this status in the Border Guard's registry. Thus, ZUS cannot rely only on the Border Guard's information provided for in the special registry and must take into account other proofs, especially those presented by the applicant.<sup>496</sup>

The Ministry of Family and Social Affairs advised in July 2023 that in the situation of the suspension/cessation of social benefits based on the incorrect data in the special registry, a person concerned should apply to have PESEL UKR restored and to correct data in the registry by the Border Guard.<sup>497</sup> However, in practice, persons concerned struggled with having their PESEL UKR restored (especially with a retroactive effect).<sup>498</sup> While in May 2023, the government informed municipalities how the restoration should be done,<sup>499</sup> this instruction was not a law (only a guidance), it was much overdue and seemed to be unknown or not followed. Moreover, in practice, the Border Guard was not promptly nor willingly changing data in the special registry.<sup>500</sup>

Some requests to rectify data in this registry were denied. Moreover, in practice, the restoration of social benefits – after the restoration of the UKR status – often lasted for months, leaving beneficiaries without needed support.<sup>501</sup> In May 2024, the Special Law was amended in order to clarify the rules in this regard. Now, the law states directly that the date of restoration is the same as the day of withdrawal of the PESEL UKR. Thus, there should be no gap in the status and access to benefits upon successful restoration.

Furthermore, withdrawal of the 'PESEL UKR' is done automatically. Concerned persons are not informed about it and no decision is issued. In practice, they learn that they are no longer temporary protection beneficiaries, e.g. only when their social assistance is ceased or when they are denied access to medical assistance.<sup>502</sup> In practice, Border Guard inserts the information about over-30-days stays abroad (real and presumed) into a special registry with a delay (even of a couple of months). Some Ukrainian nationals and their family members, unaware that they lost their temporary protection status, received in this period

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<sup>494</sup> Human Rights Commissioner, 'Uchodźcy z Ukrainy tracą status UKR, a wraz z nim - prawo do świadczeń wychowawczych. Wyjaśnienia ZUS', 2 August, 26 October, 24 November 2023, available in Polish [here](#).

<sup>495</sup> SIP, 'Input to the EUAA Asylum Report 2024', November 2023, available [here](#), 18. See also other judgments reproaching ZUS for limiting their evidentiary activities: Provincial Administrative Court in Cracow, judgment of 10 September 2024, no. III SA/Kr 981/24; Provincial Administrative Court in Gliwice, judgment of 13 September 2024, no. II SA/GI 626/24.

<sup>496</sup> SIP, 'Wyrok NSA: Świadczenia dla obywateli Ukrainy a brak rejestracji wjazdu do Polski', 25 February 2025, available in Polish [here](#).

<sup>497</sup> Ministry of Family and Social Affairs, 'Odpowiedź na interpelację nr 40924 w sprawie problemów obywateli Ukrainy dotyczących nieuzasadnionej utraty świadczenia wychowawczego', 7 July 2023, available in Polish [here](#). See also Human Rights Commissioner, 'Uchodźcy z Ukrainy tracą status UKR, a wraz z nim - prawo do świadczeń wychowawczych. Wyjaśnienia ZUS', 2 August, 26 October, 24 November 2023, available in Polish [here](#).

<sup>498</sup> Human Rights Commissioner, 'Uchodźcy z Ukrainy są błędnie pozbawiani statusu uprawniającego do opieki medycznej i pomocy. *Ponowne pismo RPO*', 16 March 2023 and 16 June 2023, available in Polish [here](#). ACAPS, 'Poland: Loss of temporary protection status and social benefits for Ukrainian refugees', 14 November 2023, available [here](#), 7.

<sup>499</sup> Human Rights Commissioner, 'Kiedy obywatel Ukrainy nie straci statusu UKR. Wyjaśnienia MSWiA dla RPO (також українською)', 3 August 2023, available in Polish [here](#).

<sup>500</sup> SIP, 'Input to the EUAA Asylum Report 2024', November 2023, available [here](#), 19.

<sup>501</sup> UNHCR, 'Poland: Joint Protection Analysis', October 2023, available [here](#), 10; Human Rights Commissioner, 'Uchodźcy z Ukrainy tracą status UKR, a wraz z nim - prawo do świadczeń wychowawczych. Wyjaśnienia ZUS', 2 August, 26 October, 24 November 2023, available in Polish [here](#).

<sup>502</sup> UNHCR, 'Poland: Joint Protection Analysis', October 2023, available [here](#), 10.

social welfare, which was requested to be returned afterwards.<sup>503</sup> ACAPS estimated in November 2023 that this could have happened to approximately 3,000-4,000 temporary protection beneficiaries.<sup>504</sup>

ACAPS also noticed other difficulties associated with receiving social benefits: 'Since late 2022, Poland's Social Insurance Institution (ZUS) has systematically requested that refugees from Ukraine confirm their residence in Poland. These requests are only made through a website, and refugees must log in to see the request. Many refugees have been unable to comply because they do not receive other notifications and are unaware that a request has been made.'<sup>505</sup>

Special temporary protection beneficiaries have been also denied access to some other social welfare benefits, like the one-time "Pro life" benefit. It is granted in case of a severe and irreversible impairment or an incurable life-threatening disease that started in the prenatal period or during birth. As it is not mentioned in the Special Law, it was denied to a special temporary protection beneficiary represented by SIP. However, upon appeal, the decision was changed because not the legal status of the applicants but her medical insurance was decisive for the eligibility assessment.<sup>506</sup>

### General temporary protection (until March 2026)

Persons enjoying temporary protection under the Act on Protection did not have access to the general social welfare system. As a rule, general temporary protection beneficiaries had access to reception centres and material reception conditions provided therein by the Office for Foreigners. Beneficiaries who were unable to access accommodation and food organised by the Office for Foreigners might have received, upon request, a financial allowance.<sup>507</sup>

A financial allowance might have been paid only upon obtaining a certificate for a person enjoying general temporary protection (see [Residence permit](#)). In 2022, 67 persons were denied medical assistance and financial allowance due to the lack of a certificate for a person enjoying temporary protection.<sup>508</sup> In 2023-2025, the problem continued, but statistical data is not available.<sup>509</sup>

The financial allowance was provided for a period of minimum 2 months,<sup>510</sup> but no longer than for the period of the validity of the certificate for temporary protection beneficiaries. This period was determined individually, in the Head of the Office for Foreigner's decision. According to the Office for Foreigners, if this period ended, a person concerned might have applied for the assistance to be granted again.<sup>511</sup>

Granting assistance in the form of accommodation and food, or a financial allowance, was dependent on the financial situation of the beneficiary.<sup>512</sup> If a person concerned worked or ran a business in Poland, their income was taken into account by the Office for Foreigners. If it was higher than the amount set in law for accessing the general social welfare system, the assistance might have been granted only in the form of accommodation, Polish language lessons and materials, and didactic materials for children. In 2022, 35 decisions refusing access to full assistance on this account were issued.<sup>513</sup> Data for 2023-2025 was not made available. Moreover, assistance was not granted if a person concerned sought asylum (then, they benefited from material reception conditions for asylum seekers).<sup>514</sup>

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<sup>503</sup> Human Rights Commissioner, 'Uchodźcy z Ukrainy są błędnie pozbawiani statusu uprawniającego do opieki medycznej i pomocy. Interwencja RPO', 16 March 2023, available in Polish [here](#).

<sup>504</sup> ACAPS, 'Poland: Loss of temporary protection status and social benefits for Ukrainian refugees', 14 November 2023, available [here](#), 1, 8-9.

<sup>505</sup> *Ibid.*, 1, 7-8.

<sup>506</sup> SIP, 'Pro-life benefit also for refugees from Ukraine', 4 June 2024, available in English [here](#).

<sup>507</sup> Article 112 of the Act on Protection, as in force until 5 March 2026.

<sup>508</sup> Information provided by the Office for Foreigners, 17 January 2023.

<sup>509</sup> Information provided by the Office for Foreigners, February 2024 and 14 March 2025.

<sup>510</sup> The temporal limitation is in contradiction with Article 13 of the TPD, see SIP, Letter of 30 November 2022 to the European Commission, available in English [here](#), 5.

<sup>511</sup> Information provided by the Office for Foreigners, 17 January 2023.

<sup>512</sup> Article 112(4-4f) of the Act on Protection, as in force until 5 March 2026.

<sup>513</sup> Information provided by the Office for Foreigners, 17 January 2023.

<sup>514</sup> Article 112(1b) of the Act on Protection, as in force until 5 March 2026.

A financial allowance for general temporary protection beneficiaries was the same as the one provided for asylum seekers. It amounted to PLN 25 (or less) per day, so at maximum PLN 750-775 per month per person. In practice, a financial allowance was not sufficient to finance all basic needs of a beneficiary, in particular to rent an apartment (for more see [Reception - Forms and levels of material reception conditions](#)). Thus, general temporary protection beneficiaries were not receiving sufficient 'means to obtain housing', against Article 13 of the TPD.<sup>515</sup> However, contrary to asylum seekers, general temporary protection beneficiaries can work or run a business in Poland (see [Access to the labour market](#)); thus, they could have had supplementary sources of income.

In 2022, 536 general temporary protection beneficiaries received a financial allowance and medical assistance (199 of them were benefiting from this assistance as of 31 December 2022); 25 persons were granted only a financial allowance under the Act on Protection (2 as of 31 December 2022). In 47 cases, the Office for Foreigners provided access to medical assistance but denied a financial allowance.<sup>516</sup> Thus, 43% of the general temporary protection beneficiaries benefited from this allowance in 2022.

The total numbers for 2023 are not available. As of 30 June 2023, 194 general temporary protection beneficiaries received a financial allowance and medical assistance, 20 received assistance only in the form of Polish language lessons and materials, 11 persons were granted only medical assistance, and 5 persons received only the financial allowance. As of 31 December 2023, 169 general temporary protection beneficiaries received a financial allowance and medical assistance, 24 received assistance only in the form of Polish language lessons and materials, 6 persons were granted only medical assistance, 2 persons received only the financial allowance and 1 person was accommodated in the reception centre.<sup>517</sup>

In 2024, 156 general temporary protection beneficiaries received a financial allowance and medical assistance, 20 received assistance only in the form of Polish language lessons and materials, 3 persons were granted only medical assistance, and 2 persons received only the financial allowance. As of 31 December 2024, 143 general temporary protection beneficiaries received a financial allowance and medical assistance, 1 received assistance only in the form of Polish language lessons and materials, and 3 persons received only the financial allowance.<sup>518</sup>

As of 31 December 2025, 137 general temporary protection beneficiaries received social assistance, including one being given only a financial allowance and two being granted access to medical assistance. In 2025, no general temporary protection beneficiary was accommodated in the reception centres.<sup>519</sup>

## **Merged temporary protection (since March 2026)**

### *New rules*

Since March 2026, housing in collective accommodation centres or receipt of the benefit to cover private accommodation expenses may be provided to temporary protection beneficiaries only for 60 days from their first entry into Poland and merely within 12 months from the beginning of the conflict that led to activation of temporary protection.<sup>520</sup> Thus, those rules do not apply to persons fleeing the full-scale invasion of Ukraine that started in 2022.

Temporary protection beneficiaries, having a PESEL number and staying in Poland with children, are, however, entitled to benefits generally available to Polish citizens, i.e.:<sup>521</sup>

1. Family benefits, specified in the Law on Family Benefits, with the similar rules as under the Special Law,<sup>522</sup>

<sup>515</sup> SIP, Letter of 30 November 2022 to the European Commission, available in English [here](#), 5-6.

<sup>516</sup> Information provided by the Office for Foreigners, 17 January 2023.

<sup>517</sup> Information provided by the Office for Foreigners, February 2024.

<sup>518</sup> Information provided by the Office for Foreigners, 14 March 2025.

<sup>519</sup> Information provided by the Office for Foreigners, 10 April 2026.

<sup>520</sup> Article 112(1) of the Act on Protection, as in force since 5 March 2026.

<sup>521</sup> Article 26 of the Special Law, repealed in March 2026.

<sup>522</sup> Ustawa z dnia 28 listopada 2003 r. o świadczeniach rodzinnych, available in Polish [here](#), Article 1, as in force since 5 March 2026.

2. 800+ financial allowance, based on the State Support in Upbringing Law, with the similar rules as under the Special Law, including the obligation to attend school and being active at the labour market,<sup>523</sup>
3. “Active in nursery” allowance, based on the Active Parent Law.<sup>524</sup>

Temporary protection beneficiaries having ‘PESEL UKR’ can receive benefits based the Law on Social Assistance, however, only in the forms of shelter, food, necessary clothing and targeted benefit.<sup>525</sup> This constitutes a significant limitation for special temporary protection beneficiaries whose access to social assistance was before unlimited.

Temporary protection beneficiaries can also benefit from food aid within the European Social Fund Plus.<sup>526</sup>

#### *Transitional provisions*

Special temporary protection beneficiaries who were entitled to social welfare benefits based on the Special Law may be still receive them until the end of the period that they were granted for.<sup>527</sup>

Temporary protection beneficiaries whose certificates confirming that they enjoyed temporary protection in Poland remained valid until 4 March 2027 (see [Residence permit](#)) can still be granted a financial allowance to cover their accommodation and living expenses (the same as for asylum seekers).<sup>528</sup>

## G. Health care

### **Special temporary protection (until March 2026)**

#### *Entitlements*

Ukrainian nationals and some of their family members enjoying temporary protection could access the general healthcare system in Poland but with some exceptions.<sup>529</sup> The list of exceptions was significantly extended in September 2025. Some of those new exceptions did not apply to children and war victims from Ukraine.

Obtaining PESEL was not necessary to benefit from medical assistance, however, it could be useful: a person having ‘PESEL UKR’ was presumed to be entitled to medical assistance. In practice, temporary protection beneficiaries not having this number faced difficulties in accessing medical assistance.<sup>530</sup>

Additionally, special temporary protection beneficiaries *might* have been provided with free-of-charge psychological assistance. Providing this assistance was at the discretion of local authorities.<sup>531</sup> Psychological assistance was only guaranteed by law with regard to temporary guardians and unaccompanied children under their care, who benefited from the Ukrainian foster care system.<sup>532</sup> The

<sup>523</sup> Ustawa z dnia 11 lutego 2016 r. o pomocy państwa w wychowywaniu dzieci, as in force since 5 March 2026.

<sup>524</sup> Article 15(1a), Ustawa z dnia 15 maja 2024 r. o wspieraniu rodziców w aktywności zawodowej oraz w wychowaniu dziecka - "Aktywny rodzic".

<sup>525</sup> Article 112a of the Act on Protection and Article 5 of the Law on Social Assistance, as in force since 5 March 2026.

<sup>526</sup> Article 112a of the Act on Protection, in force since 5 March 2026.

<sup>527</sup> Article 43 and 44 of the Phasing-Out Law.

<sup>528</sup> Article 20(3) of the Phasing-Out Law.

<sup>529</sup> Article 37 of the Special Law, repealed in March 2026.

<sup>530</sup> Human Rights Commissioner, ‘Problemy opieki zdrowotnej uchodźców z Ukrainy. Resort zdrowia informuje RPO o swych działaniach’, 13 April 2022, 13 May 2022, available in Polish [here](#).

<sup>531</sup> Article 32 of the Special Law, repealed in March 2026.

<sup>532</sup> Article 25(3b) of the Special Law, until 30 June 2024. From 1 July 2024 until 4 March 2026, Article 25<sup>1</sup>(6) of the Special Law with regard to children and persons from Ukrainian institutional foster care system.

general discretion of authorities as regards the provision of psychological assistance and the gross limitation of the personal scope of this assistance, was considered to be against Article 13(4) of the TPD.<sup>533</sup>

Polish authorities *might* have assisted special temporary protection beneficiaries with transport to medical establishments.<sup>534</sup> Until 1 March 2023, regional authorities (voivodes) were obliged to provide this assistance for at least 2 months starting with the entry to Poland by a person concerned. However, in January 2023, Article 12(17) of the Special Law was amended, and currently, there is no obligation of any Polish authorities to provide persons enjoying special temporary protection in Poland with means of transport to benefit from medical assistance. They only have the discretion to provide such assistance.

Ukrainian nationals who fled from Ukraine after 24 February 2022 were also eligible to receive funding for purchasing medicines. It was financed by state<sup>535</sup> and private donors.<sup>536</sup> In practice, some doubts were raised about whether children and the elderly are entitled to free-of-charge medicines. In September 2023, the Human Rights Commissioner asked the Ministry of Health to take a stand; no answer was provided or published.<sup>537</sup> It is unknown whether this letter was answered.

Access to a labour market for Ukrainian doctors, dentists, nurses and midwives has been facilitated.<sup>538</sup> According to one study, already by January 2023, some 5,000 Ukrainian doctors, and 2,000 Ukrainian nurses and midwives applied to benefit from the facilitated access to employment in Poland.<sup>539</sup> Ukrainian doctors, dentists, nurses and midwives could also have their Polish language lessons co-financed from a state budget but only until 1 June 2025.<sup>540</sup> Some support to medical practitioners was also offered by private initiatives, e.g. the Polish-Ukrainian Economic Chamber (language courses, etc.).<sup>541</sup>

Ukrainian psychologists could also provide psychological assistance to their compatriots, but only until 24 August 2023. It has been criticised that this possibility was not prolonged further, despite the fact that the limited availability of psychological assistance to Ukrainian nationals is considered to be one of the biggest concerns in Poland.<sup>542</sup> Over one hundred NGOs called for an immediate change in the law in this regard.<sup>543</sup> The Human Rights Commissioner intervened too.<sup>544</sup> The law was changed in May 2024: Ukrainian psychologists were again entitled to assist their compatriots from 1 July 2024 to 4 March 2026 (Article 64b of the Special Law).

### *Hampered access*

In the UNHCR's study of November 2023, 27% of respondents declared that they had limited access to healthcare in Poland.<sup>545</sup> The IOM's annual study for 2023 also shows that 21% of the respondents faced obstacles preventing them from accessing healthcare in Poland.<sup>546</sup>

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<sup>533</sup> SIP, Letter to the Ministry of Internal Affairs and Administration, 28 October 2022, available in Polish [here](#), 18-19.

<sup>534</sup> Article 12(1)<sub>(3)</sub> of the Special Law, repealed in March 2026.

<sup>535</sup> E.g. PFRON, 'Zaopatrzenie w wyroby medyczne - wsparcie dla uchodźców z Ukrainy', 1 April 2022, available in Polish [here](#).

<sup>536</sup> See e.g. [here](#).

<sup>537</sup> Human Rights Commissioner, 'Kwestia bezpłatnych leków dla uchodźców wojennych z Ukrainy w wieku do 18. oraz po 65. roku życia. Pismo do MZ', 26 September 2023, available in Polish [here](#).

<sup>538</sup> Article 61-64a of the Special Law, repealed in March 2026.

<sup>539</sup> C. Katsiaticas, J. Segeš Frelak, G. Güzelant, A. Piłat, 'Creative approaches to boosting the employment of displaced Ukrainians in Central and Eastern Europe', ICMPD, September 2023, available [here](#), 3.

<sup>540</sup> Article 22i of the Special Law.

<sup>541</sup> See [here](#).

<sup>542</sup> UNHCR, 'Poland: Joint Protection Analysis', October 2023, available [here](#), 12.

<sup>543</sup> Mapuj Pomoc, 'Apel o interwencję w sprawie kryzysu w świadczeniu pomocy psychologicznej obywatelom Ukrainy (aktualizacja)', 11 August 2023, available in Polish [here](#).

<sup>544</sup> Human Rights Commissioner, 'Psychologowie z Ukrainy stracili prawo wykonywania zawodu w Polsce. RPO pisze do marszałek Senatu', 2 October and 20 November 2023, 24 January, 13 February and 19 February 2024, available in Polish [here](#).

<sup>545</sup> UNHCR, 'Multi-Sector Needs Assessment - Results Overview (MSNA Poland 2023)', November 2023, available [here](#)..

<sup>546</sup> IOM, 'Poland — Access to Healthcare for Refugees from Ukraine — Annual Report (2023)', 30 April 2024, available in English [here](#), 7.

Practical difficulties included a language barrier.<sup>547</sup> Polish authorities informed that it was not possible to finance translation costs from the National Health Fund. To counteract this difficulty, the special application LikarPL for doctors and patients was created, available in Polish, Ukrainian, Russian and English. Moreover, Ukrainian speakers were hired to provide medical assistance remotely.<sup>548</sup> Despite that, the language barrier was prominently mentioned as a main difficulty in the reports published in 2023 and 2024 concerning access to different services, including healthcare, in Poland.<sup>549</sup> The problem continued in 2025.<sup>550</sup>

Studies concerning access to healthcare for Ukrainian nationals in Poland indicated also that long waiting periods for appointments and too high costs of medical assistance were problematic issues in 2022-2025.<sup>551</sup> However, these reports acknowledged that Polish nationals face the same problems. Moreover, some Ukrainian nationals showed the lack of trust in the Polish medical system. Some temporary protection beneficiaries temporarily returned to Ukraine to receive a medical treatment or medications they needed.<sup>552</sup> The lack of information how to seek medical and psychological assistance in Poland was also often listed as a reason for not accessing this support.<sup>553</sup>

In 2022-2025, Ukrainian nationals who lost 'PESEL UKR' (due to their absence in Poland for more than 30 days, see [Movement and mobility](#)) lost also their access to public healthcare. They sometimes learned that they were no longer temporary protection beneficiaries after already being treated in hospitals and other medical establishments. In these circumstances, they were required to pay back the costs of the treatment (similarly as with the social allowances, see [Social welfare](#)).<sup>554</sup>

### General temporary protection

Under the Act on Protection, until 4 March 2026, temporary protection beneficiaries had access to medical assistance, upon their motion and if they received a certificate for temporary protection beneficiaries first.<sup>555</sup> In 2022, 67 persons were denied medical assistance and financial allowance due to the lack of a certificate for a person enjoying temporary protection.<sup>556</sup> In 2023-2025, the problem continued, but the statistical data is not available.<sup>557</sup>

The medical assistance was provided for a period of minimum 2 months, but no longer than for the period of the validity of the certificate for temporary protection beneficiaries. This period was determined individually, in the Head of the Office for Foreigner's decision. According to the Office for Foreigners, if this period ended, a person concerned could have applied for assistance to be granted again.<sup>558</sup>

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<sup>547</sup> UNHCR, 'Multi-Sector Needs Assessment - Results Overview (MSNA Poland 2023)', November 2023, available [here](#), 33; UNHCR, 'Poland: Joint Protection Analysis', October 2023, available [here](#), 12.

<sup>548</sup> Human Rights Commissioner, 'Problemy opieki zdrowotnej uchodźców z Ukrainy. Resort zdrowia informuje RPO o swych działaniach', 13 April 2022, 13 May 2022, available in Polish [here](#).

<sup>549</sup> IOM, 'Poland — Access to Healthcare for Refugees from Ukraine — Annual Report (2023)', 30 April 2024, available in English [here](#), 7.

<sup>550</sup> IOM, 'From the War Front to a Humanitarian Aid: How Ludmila Lysak Helps Refugees Navigate Healthcare in Poland', 25 August 2025, available [here](#).

<sup>551</sup> IOM, 'Poland — Access to Healthcare for Refugees from Ukraine — Annual Report (2023)', 30 April 2024, available in English [here](#), 7.

<sup>552</sup> Save the Children and IMPACT, 'Experiences, Needs and Aspirations of Children, Adolescents and Caregivers Displaced from Ukraine', available [here](#), 39-40. See also UNHCR, 'Poland: Joint Protection Analysis', October 2023, available [here](#), 11-12; L. Murray, J. Linke and R. Stoican, 'The protection needs identified by displaced Ukrainian children and adolescents', FMR no. 72, available [here](#), 35; UNHCR, 'Multi-Sector Needs Assessment - Results Overview (MSNA Poland 2023)', November 2023, available [here](#), 33. IOM, 'Poland — Ukrainian Nationals Crossing Back to Ukraine (April - June 2024)', September 2024, available in English [here](#), 8.

<sup>553</sup> See e.g. UNHCR, 'Multi-Sector Needs Assessment - Results Overview (MSNA Poland 2023)', November 2023, available [here](#), 34. IOM, 'From the War Front to a Humanitarian Aid: How Ludmila Lysak Helps Refugees Navigate Healthcare in Poland', 25 August 2025, available [here](#).

<sup>554</sup> UNHCR, 'Poland: Joint Protection Analysis', October 2023, available [here](#), 10.

<sup>555</sup> Article 112 of the Act on Protection, as in force until 4 March 2026.

<sup>556</sup> Information provided by the Office for Foreigners, 17 January 2023.

<sup>557</sup> Information provided by the Office for Foreigners, February 2024.

<sup>558</sup> Information provided by the Office for Foreigners, 17 January 2023.

If a temporary protection beneficiary was entitled to access a general healthcare system due to their work or running a business in Poland, they were not covered by medical assistance organised by the Office for Foreigners.<sup>559</sup> Moreover, medical assistance for temporary protection beneficiaries was not granted if a person concerned sought asylum (then, they benefited from material reception conditions for asylum seekers).<sup>560</sup>

Health care for temporary protection beneficiaries was the same as for asylum seekers. Hence, all problems of asylum seekers in this respect applied also to persons enjoying temporary protection under the Act on Protection (see [Reception: Health care](#)).

In 2022, 536 temporary protection beneficiaries received a financial allowance and medical assistance (199 of them were benefiting from this assistance as of 31 December 2022); 67 persons were granted only medical assistance under the Act on Protection (21 as of 31 December 2022). Additionally, six persons benefited from health care in reception centres for asylum seekers.<sup>561</sup> Thus, 47% of the general temporary protection beneficiaries benefited from medical assistance organised by the Office for Foreigners in 2022.

Total numbers for 2023 are not available. As of 30 June 2023, 194 general temporary protection beneficiaries received a financial allowance and medical assistance and 11 persons were granted only medical assistance. As of 31 December 2023, 169 general temporary protection beneficiaries received a financial allowance and medical assistance and 6 persons were granted only medical assistance.<sup>562</sup>

In 2024, 156 general temporary protection beneficiaries received a financial allowance and medical assistance and 3 persons were granted only medical assistance. As of 31 December 2024, 143 general temporary protection beneficiaries received a financial allowance and medical assistance.<sup>563</sup>

As of 31 December 2025, only two general temporary protection beneficiaries were granted access to medical assistance.<sup>564</sup>

## **Merged temporary protection (since March 2026)**

### *New rules*

Access to medical assistance have been significantly restricted since 5 March 2026. Currently, only five categories of temporary protection beneficiaries having PESEL UKR are eligible for accessing general healthcare system (with some exceptions):

1. torture survivors and rape victims (based on the confirmation issued by the Office for Foreigners<sup>565</sup>),
2. children,
3. persons living in collective accommodation centres (based on the written confirmation of being accommodated there),
4. pregnant women, including childbirth and postpartum period,
5. persons who were injured in the war in Ukraine (PESEL UKR is not required).<sup>566</sup>

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<sup>559</sup> Article 112(4d) of the Act on Protection, as in force until 4 March 2026.

<sup>560</sup> Article 112(1b) of the Act on Protection, as in force until 4 March 2026.

<sup>561</sup> Information provided by the Office for Foreigners, 17 January 2023.

<sup>562</sup> Information provided by the Office for Foreigners, February 2024.

<sup>563</sup> Information provided by the Office for Foreigners, 14 March 2025.

<sup>564</sup> Information provided by the Office for Foreigners, 10 April 2026.

<sup>565</sup> According to the Office for Foreigners, 'Beneficiaries of temporary protection who, in connection with Russia's invasion of Ukraine, are victims of torture or rape, in order to receive a certificate confirming such circumstances, should attach to the application for the certificate all available documentation on this subject, including medical and forensic documentation, as well as information regarding reporting the above-mentioned facts to law enforcement authorities', see Office for Foreigners, 'Informacja o wydawaniu zaświadczeń ofiarom tortur lub gwałtu', 9 March 2026, available in Polish [here](#).

<sup>566</sup> Article 112c(1) of the Act on Protection, in force since March 2026.

Thus, most temporary protection beneficiaries, including seriously ill persons, do not have access to the general healthcare system since March 2026.

*Transitional provisions*

Ukrainian nationals who before 5 March 2026 were undergoing hospital treatment under the Special Law, are entitled to continue this treatment until the end of hospitalisation, but no longer than until 4 March 2027.<sup>567</sup>

Temporary protection beneficiaries whose certificates confirming that they enjoyed temporary protection in Poland remained valid until 4 March 2027 (see [Residence permit](#)) can still be granted access to medical assistance organised by the Office for Foreigners (the same as for asylum seekers).<sup>568</sup>

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<sup>567</sup> Article 22 of the Phasing-Out Law.

<sup>568</sup> Article 20(3) of the Phasing-Out Law.