

Temporary Protection Belgium

Update on 2025

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

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Relevant documents related to temporary protection

Electronic A-card	The A-card is a residence permit that is, amongst others, granted to beneficiaries of temporary protection. If the applicant is granted temporary protected status, they will receive an electronic identity card, type A, that is currently valid until 4 March 2025.
Annex 15	The Annex 15 is a temporary residence permit with a validity of 45 days awaiting the issuing of the A-card. Beneficiaries receive the Annex 15 upon registration, after their address is confirmed by the municipality, they are given the A-card.
Temporary protection certificate	Upon registration at the Immigration Office at the registration centre, beneficiaries with a positive decision on their temporary protection application receive a temporary protection certificate. The certificate serves as evidence of their right to temporary protection but does not in itself functions as a residence permit.
Attestation of registration	Applicants for Temporary Protection, for whom a decision cannot be taken on the same day as the application is made, receive an attestation of registration. This attestation does not grant residence and does not confer any rights on the applicant.

Temporary Protection Procedure

A. General

The Temporary Protection Directive (TPD) was implemented based on the provisions of the Belgian Foreign nationals Act (“*de Vreemdelingenwet*”)¹ introduced in 2003.² At the time of implementation, temporary protection was not ‘unknown’ to the Belgian Immigration Office, as in the past similar protection had been offered to nationals of former Yugoslavia, Rwanda, Bosnia, and Kosovo.³ However, a framework that gave legal status to displaced persons was lacking until the implementation of the Directive. Following the Russian invasion, the Belgian Senate agreed on 25 February 2022 that the necessary steps should be taken to temporarily accommodate Ukrainian war refugees.⁴ Following the Council Implementing Decision (EU) 2022/382 of 4 March 2022, a registration centre was set up in Brussels for people with a potential right to temporary protection.⁵ Following the Council implementing decision of 15 July 2025, Temporary Protection has been extended in Belgium until 4 March 2027.⁶

At the time of writing (April 2026), no transitional arrangements or general policy measures have been adopted in preparation for the period following March 2027.

Main legislative acts relevant to procedure for and content of temporary protection

Title (EN)	Original Title (FR/NL)	Web Link
Belgian Foreign nationals Act	Loi du 15 décembre 1980 sur l'accès au territoire, le séjour, l'établissement et l'éloignement des étrangers Wet van 15 december 1980 betreffende de toegang tot het grondgebied, het verblijf, de vestiging en de verwijdering van vreemdelingen	https://bit.ly/4cYAZ20 (NL) https://bit.ly/3xCcM1g (FR)
Reception Law	Loi du 12 janvier 2007 sur l'accueil des demandeurs d'asile et de certaines autres catégories d'étrangers Wet van 12 januari 2007 betreffende de opvang van asielzoekers en van bepaalde andere categorieën van vreemdelingen	https://bit.ly/49Bcmpg (NL) https://bit.ly/4cYirPb (FR)

The Belgian Foreign nationals Act provides that temporary protection is applied to the same categories of people who are eligible for temporary protection under the implementing decision.⁷ While this is the case overall, there are slight differences in interpretation and implementation (see further: [Qualification for temporary protection](#)).

¹ Law of 15 December 1980 regarding the entry, residence, settlement and removal of aliens (Foreign nationals Act), available in Dutch and French at: <https://bit.ly/3YaTMyC>.

² Law of 18 March 2003 amending the Law of 15 December 1980 regarding the entry, residence, settlement and removal of aliens, available in Dutch and French at: <http://bit.ly/3HkLXzE>.

³ Chamber of representatives, *Wetsontwerp*, 1 October 2002, available in French and Dutch at: <https://bit.ly/3IF11vd>, 4.

⁴ The Senate, ‘*The senate passes a resolution on the Russian invasion in Ukraine*’, 25 February 2022, available in Dutch and French at: <http://bit.ly/3KPumms>.

⁵ IO, *Registration Centre*, available in English at: <https://rb.gy/jv0hqh>.

⁶ Council implementing Decision (EU) 2025/1460, *extending the temporary protection introduced by Implementing Decision (EU) 2022/382*, 15 July 2025, available [here](#).

⁷ Foreign nationals Act, Article 59/27, available in Dutch and French at: <https://bit.ly/3YaTMyC>.

Between 10 March 2022 and December 2025, 101,015 persons received a temporary protection certificate in Belgium, of which 8,756 in 2025 alone⁸ In 2025, all beneficiaries of temporary protection, obtained this status based on article 2(1) of the 2022 implementing decision, meaning they had an independent right to TP.⁹ In 2025, Ukrainians accounted for 98.94% of temporary protection beneficiaries.¹⁰ 3,286 negative decisions were issued in 2025, which is an increase of 272% compared to 2024.¹¹ 3% of the negative decisions were given to non-Ukrainian nationals. The overall number of positive decisions in 2025 was also less than in 2024.¹²

Since 2024, no data is made available anymore on the grounds for refusal of temporary protection. The most common refusal grounds in 2023 were (in descending order):

- ❖ the person does not fall under the application scope of temporary protection (788 refusals),
- ❖ the person has a residence permit (other than TP) in a different member state (244 refusals),
- ❖ the person is a third country national with a permanent Ukrainian residence permit who is found to be able to return to the country of origin in a safe in durable manner (31),
- ❖ fraud (13), and
- ❖ exclusion from temporary protection; threat to public order (3).¹³

B. Qualification for temporary protection

Temporal scope

The temporal scope of temporary protection in Belgian law is in line with article 4 §1 of the TPD. Initially, temporary protection is granted for a year, renewable with two periods of six months, after which a new Council decision could extend it for another year. The temporary protection status can either be ended in case the maximum period is reached or at any time if a decision of the Council of the EU ends temporary protection.¹⁴ Belgium has currently extended the temporary protection up to 4 March 2027 (see [Residence permit](#)).¹⁵

Material scope

The following groups are considered to fall under the scope of temporary protection in Belgium as implemented by the federal authority responsible for handling and deciding on temporary protection applications, the Immigration Office:

- (1) Ukrainian nationals and their family members who had their principal place of residence before 24 February 2022 in Ukraine;
- (2) stateless persons and third country-nationals who enjoyed international protection or an equivalent status in Ukraine before 24 February 2022 and their family members who, before that date, had their main place of residence in Ukraine;

⁸ IO, *Temporary protection monthly statistics 2025 December*, available in Dutch and French [here](#) (see table 1.1 & 1.2).

⁹ Information provided by the Immigration Office March 2026.

¹⁰ IO, *Temporary protection monthly statistics 2024 December*, available in Dutch and French [here](#) (see Table 1.4)

¹¹ There is no statistics available on total amount of *applications*, hence the number of negative decisions cannot be correctly related relative to the total amount of applications.

¹² IO, *Temporary protection monthly statistics 2025 December*, available in Dutch and French [here](#) (see table 1.5 and 2).

¹³ IO5 April 2024. Numbers applicable for 2023 (*no data were provided for 2024 or 2025*). For the grounds of exclusion for temporary protection, see Foreign nationals Act, article 57/32 §1, available in Dutch and French at: <https://bit.ly/3YaTMyC>.

¹⁴ Foreign nationals Act, article 57/30 §1, available in Dutch and French at: <https://bit.ly/3YaTMyC>.

¹⁵ Council of the EU, *EU-member states prolong temporary protection for refugees from Ukraine*, 13 June 2025, available in English.

- (3) third country nationals who resided in Ukraine before 24 February 2022 on the basis of a valid permanent residence permit and who cannot return to their country in a safe and durable manner.¹⁶

Contrary to the wording of the Council Implementing Decision, the Immigration Office does not speak of Ukrainian nationals who were 'residing' in Ukraine before 24 February but of those having their 'primary residence' in Ukraine before this date. In October 2023, the CALL however ruled that the condition of 'primary residence in Ukraine' is not valid as it does not have any legal ground.¹⁷ While the Immigration Office does no longer refer to 'primary residence' in its decisions, this condition is still mentioned on its website.¹⁸ While it is plausible that many who resided in Ukraine before 24 February also had their primary residence in Ukraine, this still constitutes a restriction of the scope determined by the Council Decision. It equally raises unanswered questions about what can and cannot be considered as a primary place of residence.

For Ukrainian nationals **who left Ukraine before 24 February 2022**, the Immigration Office evaluates their case on an individual basis, considering all relevant elements.¹⁹ In practice, there are no known cases (with the exception of the first year that TP was applied) of persons having left before this date receiving TP.²⁰ This strict interpretation is reflected in several negative decisions: a person who left Ukraine on 21 February 2022 was considered to not fall under the scope of the TPD,²¹ a person who left Ukraine less than three months before the 24 February to come to Belgium was considered to have left Ukraine "long before" 24 February 2022.²² However, more recently the CALL has ruled that, while it is within the margin of discretion of the Immigration Office to decide whether a person has left Ukraine "since a long time" or "shortly before 24 February 2022", the Immigration Office nevertheless has an obligation to explain the reasons why it has decided to extend or to not extend the scope to those persons who left Ukraine shortly before the outbreak of the war. The simple enumeration of the dates of absence from Ukraine does not suffice to conclude that the person, merely on the basis of these absences, does not fall under the scope of the TPD.²³ For example, the CALL ruled that the fact that a person was in Poland on three different occasions in 2021, including in the months before the outbreak of the war, was not sufficient to conclude that the person did not fall under the TPD.²⁴ The specific recommendation of the European Commission to extend temporary protection to those categories of persons who left Ukraine shortly before 24 February because of work, studies, or family visits (...), is not implemented as the interpretation of the 24 February criteria is very strict.²⁵ While the CALL grants a margin of discretion to the IO in this regard, it has questioned the non-enforceability of the European Commission recommendation in a particular case. In its motivation for the negative decision, the Immigration Office referred 'in particular' to Recital 14 of the TP implementing decision.²⁶ The CALL then ruled that "since the defendant itself appears to have taken the view that Recital 14 had to be taken into account "in particular" when assessing the applicant's application, it cannot now hide behind the alleged unenforceability of that recital".²⁷ In another decision however, the CALL ruled that Recital 14 is not binding, which still seems to be the general approach.²⁸

¹⁶ IO, *Temporary Protection*, available at: <https://bit.ly/3J9SwHo>.

¹⁷ CALL, nr. 295.240, 10 October 2023, available in French [here](#).

¹⁸ The Immigration Office webpage on Temporary Protection still mentions the criterium of 'main place of residence'; IBZ, *Temporary protection*, available in French, Dutch and English [here](#).

¹⁹ Myria, *Contact meeting*, 18 May 2022, p.14, available in French and Dutch at: <https://bit.ly/3XMDJHv>.

²⁰ See for example: CALL, nr. 296 382, 27 October 2023, available in Dutch [here](#) CALL, nr. 318 441, 12 December 2024 available in French [here](#); CALL, nr. 315 873, 5 November 2024 available in French [here](#).

²¹ CALL, nr 331 759, 28 August 2025, available in Dutch [here](#).

²² CALL, nr. 295.240, 10 October 2023 (the persons left Ukraine on 30.11.2022), available in French at: <https://tinyurl.com/pxkwy5ys>.

²³ CALL, nr. 316 291, 12 November 2024, available in French [here](#), 8; and CALL, nr. 318 053, 6 December 2024, p. 5, available in French [here](#).

²⁴ CALL, nr. 311 771, 26 August 2024, available in French [here](#).

²⁵ This is equally observed by Agii (Agency for integration and citizenship, see; *Conditions Procedure Temporary Protection*, available Dutch [here](#).

²⁶ Recital 14 : "Member States may also extend temporary protection to additional categories of displaced persons above and beyond those to whom this Decision applies, where those persons are displaced for the same reasons and from the same country or region of origin as referred to in this Decision.[...]"

²⁷ CALL, nr. 331 759, 28 August 2028, available in Dutch [here](#).

²⁸ CALL, nr. 330 701, 6 August 2025, available in Dutch [here](#).

Lastly, it was established that the fact that a person (with Ukrainian nationality) left Ukraine before 24 February to apply for international protection in Belgium, does not change the fact that they do not fall under the scope of temporary protection because they were not residing in Ukraine in February 2022.²⁹

Three types of **third country nationals** are eligible for temporary protection in Belgium:

- (1) people who benefitted from international protection or equivalent national protection in Ukraine whose primary residence was in Ukraine before 24 February 2022;
- (2) people residing in Ukraine before 24 February 2022 on the basis of a valid permanent residence permit who are not able to return safely and durably to their country of origin;
- (3) people who provide proof of family links with a person enjoying temporary protection and resided in Ukraine before the 24 February 2022.

The decision as to whether a person can return to their country of origin safely and durably is taken on a case-by-case basis on the ground of a brief interview and evidence provided by the applicant.³⁰ There is no defined list of countries that are not considered as places where a safe and durable return is possible. To determine whether a return to the country of origin under these conditions is possible, a short interview is conducted shortly after the application has been made. While the member state must take into account the general situation in the country of origin, the person is expected to present of their own initiative evidence in support of an individual impossibility to return in a safe and durable manner.³¹ With regards to the possibility of a durable return, the Immigration Office takes– among other things but not exclusively – the following into account: whether the person has accommodation in the country of origin, whether the person has lived³² or travelled there recently,³³ the years spent there, whether the person has exercised economic activities there in the past, whether the person has studied there, whether the person was able to provide for their living expenses, whether the person has a social network there and whether the person speaks the local language.³⁴ In regards to a family with a minor child, the Immigration Office particularly looks at the child's link with the country of origin or the possibility of developing this link, the years the child has spent there and the possibility of learning the culture and language (though the parents).³⁵ With regards to the possibility of a safe return, the Immigration Office (amongst others) at whether a person has requested international protection in Ukraine, past returns/visits to the country of origin or the possible renewal of his or her national passport (contact with the authorities).³⁶ It is also considered whether the state of health could prevent them from returning to the country of origin.³⁷

In case the Immigration Office decides that the person can return to their country of origin, this decision may be subjected to a non-suspensive appeal to the Council for Alien Law Litigation (CALL). The applicant can also decide to apply for international protection.

²⁹ CALL, nr. 316.227, 8 November 2024, P.7 available in French [here](#); the case concerned a person of Ukrainian nationality who applied for international protection on 24 September 2021.

³⁰ IO, *Stateless persons and nationals of third countries*, available in English at: <https://bit.ly/3Zkem0y>.

³¹ Myria, 'contact meeting', 18 May 2022, p. 7-8, available in French and Dutch at: <https://bit.ly/3Z8V8es>, and CALL, nr. 297.560, 23 November 2023, available in Dutch at: <https://tinyurl.com/4pde8msn>.

³² IO, negative decision [internal document], 25 August 2022.

³³ CALL, nr. 297.560, 23 November 2023, available in Dutch at: <https://tinyurl.com/4pde8msn>.

³⁴ See: CALL, nr. 278.203, 30 September 2022, available at: <https://tinyurl.com/3axa7dse>; CALL, nr. 278.204, 30 September 2022, available in Dutch at: <https://tinyurl.com/yc262fef>; CALL, nr. 277.651, 20 September 2022, available in Dutch at: <https://tinyurl.com/4pnh4mr9>.

³⁵ CALL, nr. 278.204, 30 September 2022, available in Dutch at: <https://tinyurl.com/yc262fef>

³⁶ IO, negative decision [internal document], September 2024 and; CALL, nr. 297.560, 23 November 2023, available in Dutch at: <https://tinyurl.com/4pde8msn>, 3.

³⁷ IO, negative decision [internal document], 25 August 2022.

The **'family members'** definition includes the following persons:

- (1) the spouse or unmarried partner with whom a durable relationship is maintained, according to the definition provided in the Belgian Foreign nationals Act (meaning only legally registered partnerships);³⁸
- (2) minor unmarried children, including those of the spouse, regardless of whether they were born within or outside the marriage or are adopted;
- (3) other close relatives who were living with the family at the time of the circumstances surrounding the mass influx of displaced persons, and who were wholly or mainly dependent at that time.³⁹

Article 2(4) of the Council Implementing Decision requires that the family members must have been residing in Ukraine before the 24 February and that they were already 'present' there 'as a family'. Belgium grants temporary protection under those same conditions. Family members who were not present in Ukraine before the 24 February (and thus to not fall under the scope of the TPD) can apply for family reunification under certain conditions⁴⁰ (see [family reunification](#)).

The scope of Temporary Protection under the Belgian national law is however restricted in some aspects. While the 'other close relatives' mentioned in article 2(4)(c) of the Council Implementing Decision are considered to fall under the scope of the TPD, the Belgian Foreign nationals Act states that Belgium 'may' grant a residence permit to this category.⁴¹

Persons with a residence permit (as a student, worker, etc.) in another member state are excluded from temporary protection.⁴² The Immigration Office stated that the fact that a person has a residence permit (any permit that allows a stay longer than three months) issued by a European member state could give rise to a refusal decision. In such case, each file is treated individually to assess the right to temporary protection. The application of this criterion is rather strict in practice. The CALL however annulled a negative decision by the Immigration Office for a person with a short-term visa for study purposes in another member state which was set to expire on short notice. It stated that 'temporary residence based on a short-term visa cannot be compared to temporary protection', referring equally the communication from the Commission, which states that people are free to choose the member state where they want to exercise the rights connected to temporary protection.⁴³

Since July 2025, the refusal ground used to refuse persons with a residence permit in another member state, was extended equally to persons with temporary protection in another member state.⁴⁴ This follows the Council Implementing decision of July 2025⁴⁵, namely Recital 4 which states that the rights under TP can only be enjoyed in one member state at a time. This has however led to situations in which temporary protection is given to only part of the family, including situations whereby children receive temporary protection while the parents don't, or vice versa. In a negative decision from January 2026, an 11-year-old child whose mother received temporary protection in Belgium, was denied temporary protection on the basis of having TP in Poland. The person did not prove that she needed TP in Belgium, nor that she would not be able to enjoy rights under TP in Poland. The Immigration office does not consider this a breach of the right to family life, as no order to leave the territory is given, and the child has access to

³⁸ Foreign nationals Act See Article 10 §1, °6 b, Foreign nationals Act.

³⁹ Website Immigration Office, *Temporary Protection*, available at: <https://bit.ly/3J9SwHo>.

⁴⁰ Article 10bis §2/1 Foreign nationals Act.

⁴¹ Article 57/34 § 3 Foreign nationals Act. This article applies to family members with a right to TP but 'find themselves outside of the European Union'.

⁴² Article 57/30 §2 °2 Foreign nationals Act, see also for example; CALL, nr. 313 368, p. 7, 24 September 2024, available in French [here](#).

⁴³ Communication from the Commission on the Operational Guidelines, available at: <http://bit.ly/41wYkC6> as confirmed by the CALL, nr. 277.962, p. 7, 14 October 2022, available in Dutch at: <https://tinyurl.com/4b93396t>

⁴⁴ Negative decisions [internal documents] communicated to the Infoline of Vluchtelingenwerk from July 2025 onwards, see also: Myria, '*Contact meeting*', 17 September 2025, in which the Immigration Office confirmed this practice, p.21, available in French and Dutch [here](#).

⁴⁵ Council implementing decision (EU) 2025/1460 *extending the temporary protection*, available [here](#).

family reunification.⁴⁶ However, the procedure for family reunification comes with many obstacles. This has led to legal uncertainty, as well as difficulties to access rights under the TPD. Moreover, in March 2026 the Infoline of Vluchtelingenwerk was made aware of a practice of the Immigration Office to no longer extend the TP status of persons who allegedly have an active TP in another member state based on information that came up in the European registration database. This was regardless of the fact that the person had already extended his Belgian residence status in the past without issue.⁴⁷ The person did not receive a motivated decision upon the revocation, and the Immigration Office has failed to confirm that a motivated decision was given.

Those who do not fall under the scope of the TPD and do not fulfil the conditions/are not eligible for family reunification(see [family reunification](#)), can only seek protection by applying for international protection (apart from other routes such as the combined permit or student visa). However, the international protection applications of persons with Ukrainian nationality, both those who do not fall under the scope of temporary protection and those who enjoy temporary protection, are frozen for as long as temporary protection is active on a European level,⁴⁸ irrespective of whether the request for international protection was lodged during or before the activation of temporary protection (see [Access to asylum](#)).⁴⁹ Moreover, for those applicants that do not have temporary protection when applying for international protection, the Dublin regulation⁵⁰ is applicable.⁵¹ The fact that the person has family members with TP in Belgium does not lead to a decision to take charge of the application of international protection. In cases of proven elements of dependency, the Immigration office may on a discretionary basis however examine if they will take charge of the application.⁵²

C. Access to temporary protection and registration

1. Admission to the territory

There has been almost no report of problems at the Belgian border for Ukrainian nationals accessing the Belgian territory in 2025. People who might be entitled to temporary protection are expected to present themselves at the registration centre in Brussels,⁵³ or, in very specific cases they may also apply at the responsible Belgian Embassy abroad⁵⁴ (see [Family Reunification](#)). Persons arriving at the airport need to have the necessary documents for travel (passport and visa if necessary). They are redirected to the registration centre; in case of need, the police can request support from interpreters for this purpose.⁵⁵ The Foreign nationals Act establishes that people who might fall under article 28 of the TPD directive (the exclusion ground) can be detained at the border.⁵⁶ In 2024, there were 37 denials of entry at the border,⁵⁷

⁴⁶ Negative decisions [internal] signaled to the Infoline of Vluchtelingenwerk, January 2026.

⁴⁷ As signaled to the Infoline of Vluchtelingenwerk, March 2026.

⁴⁸ Article 51/9 Foreign nationals Act. See also CGRS, 'Ukraine - state of affairs regarding applications for protection in Belgium', 17 March 2022, available at <https://bit.ly/3WWEHA4>. Confirmed in Myria, 'contact meeting', 18 October 2023, p. 19, available in French and Dutch at: <https://bit.ly/3u7EgKI>.

⁴⁹ Chamber of representatives, *Wetsontwerp*, 1 October 2002, available in French and Dutch at: <https://bit.ly/3IF11vd>, 29-30. This measure is based on Article 57/6 Foreign nationals Act, which allows for an extension of maximum 21 months before the issuing of a decision. However, also persons who have been waiting for 21 months do not receive decisions. This practice was confirmed by the CGRS, see; Myria, 'contact meeting', 19 June 2024, available in Dutch and French [here](#), 19 and Myria, *contact meeting*, 4 December 2024, 28.

⁵⁰ Regulation (EU) No 604/2013, available [here](#).

⁵¹ Response from the Immigration Office after inquiry application of Dublin to Ukrainian nationals, 24 July 2024, see also CALL nr. 334 672, 20 October 2025 in which a Ukrainian national was given an order to leave the territory based on the Dublin regulation. Available in Dutch [here](#).

⁵² Myria, 'contact meeting', 19 November 2025, available in Dutch and French [here](#).

⁵³ IO, *Where to submit a request for temporary protection?*, available at: <https://bit.ly/3IDfIMQ>; See also Myria, 'contact meeting', 24 January 2024 where Immigration Office confirmed that it was not possible to apply for Temporary protection at the border, available in Dutch and French [here](#), 8.

⁵⁴ Article 57/34 §1 Foreign nationals Act

⁵⁵ Myria, 'contact meeting', 15 March 2023, p.7, available in Dutch and French at: <https://bit.ly/3S8Jhe5>.

⁵⁶ Chamber of representatives, *Wetsontwerp*, 1 October 2002, available in French and Dutch at: <https://bit.ly/3IF11vd>; Article 57/32 Foreign nationals Act.

⁵⁷ IO, information provided February 2025.

however since the war in Ukraine, there have been no expulsions to Ukraine according to the latest data available.⁵⁸

There have been no problems reported for Ukrainian nationals with re-accessing the country after a return to Ukraine, regardless of whether they have previously received the temporary protection status. However, for beneficiaries of TP, other rights may be affected. If they no longer fall under the visa free travel period of three months, the general rules of Belgian immigration law are applicable, and they may be detained at the border in the absence of the necessary entry documents. The problems however mainly arise in terms of communication with the local municipality about the duration of the departure, a lack of which can seriously affect their right to social benefits, housing, and residence permit (see [Movement and mobility](#)).

The general rule is that persons with a residency permit (A-card) or those still within their three months visa-free period with a biometrical passport can always return to Belgium on the basis of their A-card and passport.⁵⁹ In case they are away for longer than three months, several conditions should be met to be assured of their right of return: (1) they should notify their municipality, upon which they will receive an annex 18, (2) their A-card should not expire in the period while they are away, (3) within 15 days upon return, they should notify their return to the municipality, (4) they should return within a year.⁶⁰

Third country nationals who think they might be eligible for temporary protection but have no visa-free entry into the Schengen area and try to reach Belgium from another country than the EU member states or Ukraine might have to acquire a visa.⁶¹ However, if they are eligible for temporary protection they may apply for temporary protection from abroad at the Belgian Embassy if they meet the following conditions (other than being eligible for temporary protection)

- ❖ They are outside the EU;
- ❖ They have a family member with temporary protection in Belgium;
- ❖ This family existed already in Ukraine and got separated because of the war.⁶²

This applies to both Ukrainian and third-country nationals, although in practice the former can make use of the visa-free entry into the EU to apply for temporary protection in Belgium. No data is available on whether (and how many) persons have actually applied for TP abroad.

2. Freedom of movement

Individuals entitled to temporary protection who are not in possession of biometric passport or travel documents have not faced any known difficulties entering Belgium or attempting to continue to other European countries. For administrative reasons, moving addresses within the country is not recommended as long as they are in the process of obtaining the residence permit. The municipality conducts a 'check' to see if the person lives at the reported address

3. Registration under temporary protection

The Immigration Office is the authority responsible for the registration of potential beneficiaries of temporary protection.

Contrary to applications for international protection, there is no specific time limit to apply for temporary protection set by the law.⁶³ Late applications for temporary protection do not negatively influence the decision. However, potential beneficiaries of temporary protection should apply for temporary protection within three months since the date of entry into the Schengen area to avoid ending up in 'irregular stay'.

⁵⁸ IO, information provided on 4 April 2023. No Information available on 2023, 2024 or 2025.

⁵⁹ Article 39 §1, §3 (2) *Royal Decree 8 October 1981*, available at: <https://bit.ly/408uhA9>.

⁶⁰ *Ibid.*

⁶¹ Article 6 (1) Schengen Borders Code, Available at: <http://bit.ly/3ZrUpVi>.

⁶² Article 57/34 §1 Foreign nationals Act.

⁶³ Article 57/30 Foreign nationals Act

If their short stay is ending, they are strongly advised to present themselves at the municipality of their visit to either prolong their short stay or to apply for temporary protection.⁶⁴

Potential beneficiaries are expected to apply at the registration centre from Monday to Friday at 8:30. Since the 1st of August 2025, registration for -temporary protection takes place at Rue Belliard 68 in Brussels. This is the same location as applicants for international protection, although both groups are organized in a different line.⁶⁵ Applicants cannot and do not have to make an appointment. Not all persons who come to apply for temporary protection within the opening hours are able to register on the same day.⁶⁶ The number of registrations happens in function of the registration capacity. Therefore, on days with many applicants, persons receive an invitation to come back the same day or at a later time, which can be later on the same day or 1-3 days later).⁶⁷

It is important to notice that the time of registration mentioned on the official Immigration Office website does not correspond to the actual moment persons are effectively allowed to enter. Applicants waiting in line may be allowed to enter as early as 7:00, and persons arriving at 8:30 often receive an invitation to come back at a later point. This is (partly) because of the busy road where the registration centre is located, which leaves little place for long lines. As applicants for international protection are also required to register in the same location, persons end up in the wrong line (for the wrong procedure). This, along with the varying registration times, often leads to confusion at the moment of registration.

Over the course of 2025, invitations to come back at a later stage were frequent as the maximum capacity had often been reached by 8:30.⁶⁸ The Immigration Office reiterates that there are no 'quota' and registration capacity depends on the number of applicants, employees, interpreters, etc.⁶⁹ In practice it has been observed that the maximum number of persons able to register daily throughout 2025 was around 70-75 persons. Invitations often were for the same day a later time, but could also be for up to 3-4 days later.⁷⁰

The numbers of applicants in line has decreased significantly in the first months of 2026, with often less than 50 people in the queue. As a result, people are generally able to register in the morning or the same day.⁷¹ There are currently no priorities in line.

Persons can be refused access to the registration centre when it is evident that the person has no connection to Ukraine or temporary protection, or when the person has already applied for temporary protection and is awaiting the decision.⁷² Applicants are asked to register their fingerprints and to present identification along with other elements proving that they fall under the scope of temporary protection.⁷³

On the day of the application, two interviews are conducted during which applicants are asked how they arrived in Belgium, on which date they left Ukraine, the reasons for their departure, and which region they are from. Their travel documents are verified to check if they have previously lodged a request for international protection or if they have previously been in Belgium.⁷⁴ Equally, the EU database for TP is

⁶⁴ Immigration Office, *Short Stay*, available at: <https://bit.ly/3RjrmjY>.

⁶⁵ See Helpukraine, *Adress change registration centre Brussels*, 4 August 2025, available in English [here](#).

⁶⁶ Observations made by Caritas International and Vluchtelingenwerk Vlaanderen during frequent visits to the registration centre.

⁶⁷ See Myria, '*contact meeting*', 17 September 2025, p.20, available in Dutch and French [here](#).

⁶⁸ Based on frequent observations at the registration centre carried out by Caritas International and Vluchtelingenwerk.

⁶⁹ Ibid.

⁷⁰ Observations registration centre by Caritas International and Vluchtelingenwerk Vlaanderen: September was marked by a large number of applicants in line, with peaks of around 200 people queuing, invitations were given out for 3-4 days later and the number of people receiving invitations exceeded the number of persons able to register on same days. Generally speaking, however, persons mostly receive invitations for the same day or the day after.

⁷¹ Ibid.

⁷² The infoline of Vluchtelingenwerk encountered cases where people were not allowed to enter because there was no link to temporary protection or because they were awaiting a decision on their TP application.

⁷³ Immigration Office, *Procedure*, available at: <https://bit.ly/3lDfIMQ>.

⁷⁴ Fedasil in response to inquiry Vluchtelingenwerk regarding the registration procedure, 27 February 2023.

consulted to see whether they have an active TP in another member state. When a temporary protection certificate cannot be issued immediately because an additional examination is deemed necessary, the person will be notified of the decision at a later stage, which may take up to approximately 2-6 weeks.⁷⁵ These applicants receive an “attestation of registration”. From January 2025 to February 2026, 970 attestations of registration were given.⁷⁶ A delay in the decision can occur especially (but not exclusively) in the following situations: (1) the applicant does not present the necessary documents, or the authenticity of the document is not clear (2) the applicant is already known to the migration authorities and additional analysis on the file is necessary, (3) there are elements of public order or public security, (4) the applicant is a third country national with a permanent residence permit in Ukraine, who claims inability to return under safe and durable conditions to their country of origin.⁷⁷ Where there is no decision on the day of application, the applicant is given a registration certificate while the Immigration Office examines the file.⁷⁸

According to the Immigration Office, potential beneficiaries must provide ‘documents proving that they belong to one of the above-mentioned categories’. Information was added more recently that this has to include ‘documents proving that they resided in Ukraine before/on 24 February 2024’.⁷⁹ This is the only public information available to Ukrainians as to the documents they should provide’. Applicants should provide proof of identity such as their biometric passport and national ID card. Persons with international protection in Ukraine, recognised stateless persons or other third country nationals should have evidence of their identity and status in Ukraine. As for the family members, in addition to proof of identity, they should provide the proof of a sustainable relationship, which can only be delivered through an original marriage certificate or the proof of having a common child (for which a birth certificate including the name of the third country national-parent or a certified DNA test is needed).⁸⁰ In this context, the Immigration Office verifies if the marriage still exists at the moment of application.⁸¹ For the category of ‘other family members’, proof of having lived together and dependency constitute a critical element in the examination. Copies of documents, such as good quality photos or the “Diia” app or paper copies, are usually accepted.

The Immigration Office assesses the right to temporary protection based on the statements of the person, the documents provided by them, as well as the data available on the European platform.⁸² The burden of proof is on the applicant.

Applicants who have previously been registered in Belgium for temporary protection are expected to mention this pro-actively to the immigration authorities.⁸³

Considering the **proof that a person was in Ukraine before 24 February 2022**, a passport and the accompanying stamps of entry and exit is not considered sufficient proof for residence in Ukraine before 24 February.⁸⁴ The Immigration Office confirmed cross-border movements cannot be deduced from a passport delivered after the outbreak of the war nor whether the 24 February condition is met.⁸⁵ In practice, also persons who had their passport delivered before the outbreak of the war are expected to provide additional proof.

The absence of proof of residence in Ukraine also prevents a person to qualify as member under article 2 (4) of the implementing decision, as this equally requires that the person resided in Ukraine before 24

⁷⁵ During the Myria ‘*contact meeting*’ 29 January 2025, available in French and Dutch [here](#) the Immigration office stated that a negative decision may take up to two weeks. However, towards the end of the 2025 the infoline of Vluchtelingenwerk received multiple signals that persons are waiting 4-6 weeks.

⁷⁶ IO, information provided March 2026.

⁷⁷ Myria, ‘*contact meeting*’, 18 May 2022, available in French and Dutch at: <https://bit.ly/3Z8V8es>, 10.

⁷⁸ *Ibid.*

⁷⁹ IBZ, *Procedure*, available at: <https://bit.ly/3IdfIMQ>.

⁸⁰ The Immigration Office in response to inquiry Vluchtelingenwerk on the interpretation of ‘family members’, 1 December 2022.

⁸¹ Myria, ‘*contact meeting*’, 18 May 2022, p.8-9, available in French and Dutch at: <https://bit.ly/3Z8V8es>.

⁸² Myria, ‘*contact meeting*’, 21 January 2026, p. 8, available in Dutch and French [here](#).

⁸³ Caritas, visit report [internal document], 17 September 2024.

⁸⁴ See CALL nr. 330 702, 6 August 2025, p. 8, available in Dutch [here](#).

⁸⁵ Myria, *contact meeting*, 21 January 2026, p.8, available in Dutch and French [here](#). Information also deduced from [internal] negative decisions by the Immigration Office.

February as part of the family.⁸⁶ The fact that other (nuclear) family members may have received temporary protection, does not exempt the person from presenting individual proof that they fall under the scope.⁸⁷

Additional evidence is equally not easily accepted, for example;

- ❖ A document from the Ukrainian border authorities indicating that no border crossings had taken place in the period from 2021 until end of April 2022, was not considered to be sufficient proof of the fact that the person was effectively also residing in Ukraine at the moment of the outbreak of the war⁸⁸
- ❖ Bank statements and transactions were not considered sufficient as someone else could have made those transactions on the account of the applicant
- ❖ Proof of a university degree obtained after the war from a Ukrainian university is not considered sufficient as it is possible that the person followed the classes online from abroad.
- ❖ Work papers confirming the persons exercised the job of firefighter between 2019 and 2023, in combination with an attestation of the employer of the persons activities, was not considered sufficient proof.⁸⁹ In another similar decision the employment papers were not considered proof of the fact that the person 'actually carried out this work in Ukraine'.⁹⁰
- ❖ Attestation of the Ukrainian authorities confirming that the person was internally displaced in Ukraine as well as indicating the municipality of domiciliation, dating from July 2022, was not considered sufficient proof. The attestation was judged 'too recent' and the fact that a person provides proof of domiciliation does in itself not show that the person 'resided' at this address.⁹¹
- ❖ Documents of medical consultations in Ukraine dating from January and February 2022, were considered insufficient as they could only prove a 'presence' in Ukraine at the moment of the consultation, and not 'residence'.⁹²

The above decisions are indicative of a very high burden of proof, which rests solely on the applicants. This burden of proof, coupled with a dire lack of information from the Immigration Office on the documents to be provided, has led to a steep increase of negative decisions (see above) with negative decisions consistently exceeding 200 a month since June 2025, reaching a peak of more than 500 negative decisions in November 2025. Despite a significant decrease in persons queuing for registration in the first months of 2026,⁹³ negative decisions have been above 300 in January, February and March 2026.⁹⁴ Although no official numbers are available on positive 2nd, 3rd, or subsequent applications after an initial negative decision based on a lack of proof, it has been observed that persons who apply for a 2nd or 3rd time manage to obtain temporary protection on the condition they are well informed on the necessary documents to be provided.⁹⁵

In practice, the person should provide:

- ❖ Official attestation of the Ukrainian border authority indicating cross-border movements in the period leading up to and after the outbreak of the war (for each member of the family).
- ❖ Objective additional documents issued by official instances, mentioning the applicants full name, the applicants address in Ukraine, and the date attesting the physical presence of the person.
- ❖ Combined with any other document providing information on residence in Ukraine (financial, medical, school, work, etc.).

⁸⁶ IO, negative decision [internal document], 19 March 2025; the case concerned a single father of Ukrainian nationality who left Ukraine with two minor children, the latter who obtained temporary protection.

⁸⁷ Immigration Office in response to enquiry Vluchtelingenwerk and Myria on new law on family reunification, 22 January 2025.

⁸⁸ IO, negative decision [internal document], 27 January 2026.

⁸⁹ IO, negative decision [internal document], 12 December 2025.

⁹⁰ IO, negative decision [internal document], 8 August 2025.

⁹¹ IO, negative decision [internal document] 18 August 2025.

⁹² IO, negative decision [internal document], 31 July 2025.

⁹³ Estimation of persons in line based on observations carried out at the registration centre by Vluchtelingenwerk Vlaanderen, Caritas International, and Ukrainian Voices.

⁹⁴ IO, 'Temporary Protection March 2026', see graph. 2.0, p.10, available in French and Dutch [here](#).

⁹⁵ Observation by the Infoline of Vluchtelingenwerk Vlaanderen based on the cases that it has followed up on.

Vluchtelingenwerk Vlaanderen has, based on information gathered from negative decisions as well as positive decisions, composed an indicative list of what these documents can be, available in English.⁹⁶

Issues are equally arising concerning evidence that **temporary protection has been ended** in the first member state. The Immigration Office has stated that the person needs to provide an official document provided by the authorities of that member state/ instances competent for asylum & migration showing that the person no longer enjoys temporary protection and that the person as a consequence can no longer enjoy the rights under TP in that member state. In addition, the European platform is consulted. No indicative list of the responsible authorities or the type of document per member state, exists.⁹⁷ It is however not clear in how far an indication that the TP has been ended on the European platform, is in itself sufficient. Nor is it clear how the evidential value of such official document is assessed in the case of an active TP indication on the European platform.

In several cases signalled through the Infoline, it was apparent that obtaining such evidence is not always easy and straightforward. For example, there has been a case of a mother obtaining TP, while her daughter who enjoyed TP in Poland and allegedly still enjoyed TP in Poland at the moment of application, received a negative decision based on the fact that she was already authorised to reside in another member state based on temporary protection. The decision did not precise whether the temporary protection in Poland was still valid, if the residence permit was still accessible, and whether consequently, she would effectively be able to enjoy her rights in Poland. Whether she would be able to effectively access her rights in another member state where her parents are not present, was not a consideration in the decision.

The responsibility to prove that the TP has ended rests solely on the applicant. In one case, a person who had enjoyed TP in Belgium since September 2023, was stripped from his status.⁹⁸ His residence permit had been extended without an issue several times, until February 2026 where his TP was revoked because he allegedly had an active temporary protection in another member state. This revocation did not seem to be accompanied by a formal decision from the Immigration Office; the municipality merely informed him his status was 'no longer valid'. The person had indeed enjoyed temporary protection in another member state before coming to Belgium. Only after many emails between the applicant and the responsible immigration department of that member state, did the person obtain proof that the TP in the previous member state was no longer valid. The person was able to obtain TP in Belgium again, but only after 3 months in irregular stay and loss of the rights connected to TP. While the Immigration Office has said that the European platform gives them the possibility to request additional info on the TP status of an applicant⁹⁹, they seem to be reluctant to do so. In the case at hand, the authorities of the first member state explicitly stated that "they do not understand why the Belgian immigration authorities don't contact them directly".

Persons with a favourable decision will receive a temporary protection certificate. This certificate is either in French or Dutch. They also receive a document which explains their status and rights as holders of 'temporary protection' from the Immigration Office. Persons to whom no decision has been granted yet, receive an attestation of registration and the info that they will receive the decision by post at a later stage.¹⁰⁰ As long as no decision is taken in the application for temporary protection, persons can provide the Immigration Office with additional documents proving they fall under the scope of TP.¹⁰¹ In practice persons are not informed of this option as the registration document does not mention this possibility, nor the contact details of the Immigration Office. There have nevertheless been some isolated cases where

⁹⁶ Vluchtelingenwerk Vlaanderen, '*temporary protection: which documents prove residence in Ukraine?*', last updated 15 January 2026, available in English [here](#).

⁹⁷ Myria, *contact meeting*, 21 January, available in Dutch and French [here](#), 9-10.

⁹⁸ Case signaled to the Infoline in March 2026, information based on [internal] decisions of the immigration office and extensive email communication with the first member state.

⁹⁹ Myria, *contact meeting*, 21 January 2026, available in Dutch and French [here](#), 10.

¹⁰⁰ Before 16 May 2022, the procedure was slightly different: people who did not immediately receive temporary protection received an invitation by e-mail. This method however resulted in people not knowing when and if they would be contacted.

¹⁰¹ Myria, *contact meeting*, 23 April 2025, available in Dutch and French [here](#), 8.

persons were given 5 days to provide additional documents, it is not clear in which specific cases applicants are given this possibility. This attestation of registration does not allow registration at the municipality, nor does it open any rights such as the right to work or the right to financial benefits. The situation is the same for persons who are not able to register on the same day and receive an invitation to return later.

A negative decision is accompanied by information on the procedure to appeal as well as a brief explanation of the procedure for international protection. However, this information is usually in French or Dutch and is not very accessible to Ukrainians or third country nationals (see [Information provision and access to NGOs](#)).

Persons who receive a negative decision can file an appeal for annulment within 30 days.¹⁰² Persons can also reapply for temporary protection, but they can only do so after the delay for appeal of 30 days has passed. The impossibility to reapply within 30 days has no legal basis in law. After enquiry about the legal basis with the Immigration Office, they simply referred to the appeal deadline.¹⁰³

The CALL has clarified in such instance that the Immigration Office may not make a second application conditional on the existence of new elements, as – contrary to the procedure for international protection – temporary protection does not contain the possibility to refuse ‘to consider a subsequent application’.¹⁰⁴

Whereas in the beginning of temporary protection, NGOs or lawyers could request a review/further clarification via mail to the Immigration Office, the Immigration Office communicated that it is not possible to request an update on a specific file through mail.¹⁰⁵

4. Legal assistance

Potential beneficiaries of Temporary protection might seek legal assistance for a variety of reasons; for example, if they received a refusal decision for temporary protection and they want to understand the decision or appeal against it. Even after recognition, situations may arise that lead individuals to seek legal help, especially with regards to their right to social welfare or rights connected to housing. They might equally seek the help of an NGO, such as Caritas or Vluchtelingenwerk, to help explain to them the reasons behind certain decisions.

Article 23 of the Belgian Constitution determines that the right to live with dignity implies for every person, *inter alia*, the right to legal assistance. The Foreign nationals Act guarantees free legal assistance by a lawyer to all foreign nationals in procedures included in the Foreign nationals Act under the conditions that apply to Belgian nationals.¹⁰⁶

There are two types of free legal assistance: first line assistance and second line assistance.¹⁰⁷

❖ First line legal assistance

The so-called “first line assistance” is a competence at the regional level and is organised in each judicial district by local Commissions for Legal Assistance, composed of lawyers representing the local bar association and the public centres for social welfare (CPAS / PCSW). There, first legal advice is given by a lawyer, or a person is referred to a more specialised instance, organisation or to “second line assistance”, completely free of charge, regardless of income or financial resources. Besides these lawyers’ initiatives, there are also other public social organisations and NGOs providing this kind of first line legal assistance such as Caritas and Vluchtelingenwerk. Vluchtelingenwerk Vlaanderen has an Infoline accessible by phone every weekday, through which people can ask any kind of question related

¹⁰² Article 39/2 §2 Foreign nationals Act, available in Dutch and French at: <https://bit.ly/3YaTMMyC>.

¹⁰³ Myria, *contact meeting*, 18 June 2025, available in Dutch and French [here](#), 9; Myria, *contact meeting*, 23 April 2025, available in Dutch and French [here](#), 8-9.

¹⁰⁴ CALL, nr. 316 291, 12 November 2024, available in French [here](#), 7.

¹⁰⁵ IO, -mail concerning the waiting time for a specific case, 11 March 2024.

¹⁰⁶ Article 90 Foreign nationals Act available in Dutch and French at: <https://bit.ly/3YaTMMyC>.

¹⁰⁷ Article 508/1-508/25 Judicial Code.

to temporary protection or any kind of other question related to their rights in Belgium. Information can be provided in Ukrainian language if needed. If the refusal decision is not sufficiently or correctly motivated, Vluchtelingenwerk may ask for a review or for clarifications by writing an e-mail to the Immigration Office. This happened more often in the immediate aftermath of the outbreak of war in Ukraine, as national authorities still had to provide comprehensive guidelines on scope of temporary protection and necessary documents to prove entitlement to the status. More recently, poorly or incorrectly motivated refusal decisions are rare to non-existent. An NGO can advise on whether it could be beneficial to appeal or not. Appeal is possible before the Council for Alien Litigation (CALL) with the aid of a (ProDeo) lawyer in the case of a refusal decision. After being granted temporary protection, individuals might need legal advice, which is mainly the case for decision on the allocation of social revenue; these cases are also supported through the Infoline of Vluchtelingenwerk.

❖ Second line legal assistance

“Second line assistance” is organised by the local bar association that exists in every judicial district. Each bar association has a bureau for legal assistance that can appoint a lawyer for (entirely or partially) free second line assistance, the so-called “Pro-Deo lawyer”. In practice, this might limit the free choice of a lawyer to a certain extent, but in theory every lawyer can accept to assist someone “Pro-Deo” and ask the bureau to be appointed as such, upon the direct request of an asylum seeker. Through this “second line assistance”, a lawyer is appointed to provide substantial legal advice and to assist and represent the person in the asylum procedure. More information about the system of second line legal assistance can be found in the [AIDA report Belgium](#).

5. Information provision and access to NGOs

With regards to the provision of information, the Foreign nationals Act merely states that, when applying for a residence permit, the person enjoying temporary protection shall be given a document, drafted in a language they understand, which sets out the applicable provisions on temporary protection. To that end, they receive a document which provides information on their status and rights as holders of ‘temporary protection’ from IBZ. As mentioned, a negative decision is accompanied by information on the procedure to appeal, as well as the contact details of the legal desk they can address for legal help.

With the ending of the activities of the Red Cross at the registration centre, many additional information is no longer provided, and the provision of info is limited to the above.

The NGO Vluchtelingenwerk Vlaanderen has an Infoline¹⁰⁸ where (potential) beneficiaries of temporary protection, volunteers, host families, municipalities, lawyers, and other organisations providing aid to displaced persons may call with any questions they have in relation to temporary protection. This may range from questions on the scope of temporary protection, on the registration procedure, social benefits, school, etc.

In Wallonia and Brussels, a similar Infoline is operated by Caritas, while Ciré maintains a French language information page on the legal position of Ukrainians in Belgium.¹⁰⁹ [Ukrainian Voices](#), a Brussels based organization, also provides information to Ukrainians. At the time of writing however, the exact nature of their services is unclear as they had to downgrade their activities and have moved out of their community centre.

On a federal level, a regularly updated information page¹¹⁰ on several aspects of temporary protection is provided in English, French, German, Ukrainian, and Russian.

¹⁰⁸ See: <http://bit.ly/3Ud57Od>.

¹⁰⁹ Ciré, ‘UKRAINE: informations sur les possibilités d’arrivée, le séjour et le statut juridique en Belgique’, available in French at: <https://bit.ly/3KiwMZx>.

¹¹⁰ See: <https://info-ukraine.be/en>.

D. Guarantees for vulnerable groups

In exceptional circumstances, where persons cannot autonomously reach the registration centre (for example due to a medical condition), an exception to the obligation to register personally can be granted. An authorisation may be given to a family member who can then register the person upon showing a doctor or hospital reference attesting to the impossibility of the person registering. In practice, to avoid misunderstandings, it is advised to inform the Immigration Office of this necessity beforehand.¹¹¹ As of December 2024, estimates suggested that 15% of newly arrived individuals would require reception support upon arrival.¹¹²

Among those in need of accommodation, priority is given to vulnerable groups. The following persons are considered vulnerable: non-accompanied minors, single and/or pregnant women and persons of age or persons with specific needs (see [Housing](#)).¹¹³

While no clear definition has been given, vulnerabilities are selected on the basis of on-site assessments. There is no standard questionnaire to identify vulnerabilities. The examination is, according to Fedasil, realised on a case-by-case basis. Persons who are victim of human trafficking or exploitation are also considered as vulnerable. However, with no transparent screening procedure and limited guidelines on the matter, there are some concerns as to whether non-visible vulnerabilities are properly identified.¹¹⁴ In practice vulnerability factors are considered also depending on the number of places available in emergency reception.¹¹⁵

Non accompanied minors from Ukraine who are not eligible for temporary protection, fall under the responsibility of Fedasil. Fedasil is however not responsible for the reception of non-accompanied minors who did receive TP.¹¹⁶

After registration, several organisations can help the beneficiaries with a redirection, if needed to a healthcare or elderly facility. In Wallonia, there is, for example, the public agency of [Aviq](#). Persons with vulnerabilities or with a disability can present themselves at a regional office where the person's overall situation is analysed so they can be redirected to the most appropriate solutions.¹¹⁷ In Flanders, the Flemish agency for persons with disability ([VAPH](#)) plays a similar role in supporting people living with a recognised disability.

With regards to persons in need of psychological support, several organisations can provide this. The [CAW](#) offers low-threshold psychosocial support in various regions across Flanders, as well as [Solentra VZW](#) where Ukrainians (as well as other nationalities) can get an appointment with a Ukrainian speaking psychologist. [PsyBru](#) also provides a tool for finding Ukrainian speaking psychologists in the Brussels area.

Considering unaccompanied minors, the registration procedure is slightly different. Just like other beneficiaries of temporary protection, they receive a temporary protection certificate with which they can present themselves to a municipality. Not having a legal guardian or parent may not be used by municipalities as a reason to refuse the issuance of the temporary residence permit (annex 15) and the subsequent residence card.¹¹⁸ The number of non-accompanied minors being signalled to the legal guardian service has decreased over the years. In 2022, 1,182 non-accompanied minors were registered,

¹¹¹ Immigration Office in response to an inquiry by Vluchtelingenwerk regarding the condition to physically apply for temporary protection, 16 May 2022.

¹¹² Parliamentary Question no.53 [Flemish government], 5 December 2024, available in Dutch [here](#), 58; see also Myria, 'contact meeting', 29 January 2025, available in French and Dutch [here](#).

¹¹³ Fedasil, information provided February 2025.

¹¹⁴ Fedasil in response to an inquiry by Vluchtelingenwerk regarding the registration procedure, 27 February 2023.

¹¹⁵ Reports communicated to the Infoline of persons with vulnerable profiles.

¹¹⁶ Myria, 'contact meeting', 21 January 2026, available in French and Dutch [here](#), 24.

¹¹⁷ Coordination unit of the Walloon Region for the reception of Ukrainian refugees, *Practical guide for support of Ukrainian refugees*, October 2022, available in French at: <https://bit.ly/3Jrg6js>.

¹¹⁸ VVSG, *what happens after registration?*, available in Dutch at: <http://bit.ly/3wEj9NQ>.

while in 2025 there were 87. In total, since the beginning of the TP registrations, 1,692 persons *who have received TP*, have been signalled as non-accompanied minors.¹¹⁹

A differentiation needs to be made between the situation of minors in the company of adults who are acquaintances or adult family members who do not have the parental authority of a parent or legal guardian, and that of minors who are not accompanied by anyone. If a minor is accompanied, they can be accommodated with the adult person. During the registration process, both the minor and the accompanier will be asked whether they agree with this arrangement.¹²⁰ The minor will be brought to the attention of the guardianship service (“dienst voogdij” or “service des tutelles”) so that a legal guardian can be appointed. Since the minor is accompanied, crisis accommodation is not always provided. As for the minors who are not accompanied, the same registration process is applicable. The person is also brought to the attention of the guardianship service. They are placed in a host family through foster care (“*Pleegzorg Vlaanderen*” in Flanders and “*VZW Mentor Jeunes*” in Wallonia or Brussels).

Local authorities are expected to monitor cases in which friends, acquaintances or a host family hosts an unaccompanied minor. However, when the minor is not placed in a host family but lives with acquaintances, there is no structural follow-up. The Immigration Office should, in such cases, report the minor to the local authorities so that they are aware of the non-accompanied minor;¹²¹ however, in practice it is not clear whether this is done.¹²²

Whereas the beginning of 2024 was marked by a shortage of legal guardians, this no longer proved to be an issue in 2025 because of the recruitment of new guardians.¹²³ Vulnerable profiles are prioritised (medical or psychological problems, pregnancy, indications of abuse, human trafficking, etc).¹²⁴ The waiting period can lead to temporary problems such as opening a bank account, accessing social benefits.¹²⁵

¹¹⁹ Immigration Office, *temporary protection, Yearly statistics 2022-2025*, available in Dutch and French [here](#).

¹²⁰ VVSG, ‘*What happens with the registration of a non-accompanied minor?*’ available in Dutch at: <http://bit.ly/3wEj9NQ>.

¹²¹ Information received orally from “pleegzorg Vlaanderen” (foster care Flanders).

¹²² *Ibid*, notification of non-accompanied minors to the legal guardianship service.

¹²³ Myria, ‘*contact meeting*’, 19 November 2025, available in French and Dutch [here](#), 51.

¹²⁴ *Ibid*.

¹²⁵ This issue has been widely addressed in a letter to the responsible minister from the VVSG along with its Walloon and Brussels partners (ASBL & Brulocalis), 19 May 2022, available in Dutch at: <https://bit.ly/40t0J0j>.

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?
The A card has a validity of one year. Currently the A card is prolonged until 4 March 2027¹²⁶
2. How many residence permits were issued to beneficiaries from the activation of the Temporary Protection Directive until December 2025?
70,636 registrations in the aliens register¹²⁷

Once in possession of the temporary protection certificate, persons can register their residency in a municipality where they have a place to stay, unless they have declared a need for housing, in which case they may receive a place at an emergency reception centre. The municipality of their place of residence is responsible for the administrative process of granting the residence permit card.¹²⁸ On 31 December 2025, 70,636 persons had been registered at a municipality.¹²⁹ This includes the persons who were given an A-card, but also those who have received an annex 15 (temporary residence awaiting the A-card) and ID's for persons under the age of 12.¹³⁰ This is less than the persons who have received a TP certificate since the outbreak of the war (102,425 in March 2026,¹³¹ This probably because of persons who received TP but never registered at a municipality, or because persons have been annulled from the register as they no longer live in Belgium (or are assumed to no longer be living in Belgium). It was estimated in February 2025 that a little more than a quarter of the displaced persons having arrived in Belgium since the outbreak of the war, has again left the country.¹³² The procedure for obtaining a residence permit can vary from a municipality to another in terms of physical and/or online appointments. Upon registration at the municipality, people receive a temporary residence permit (annex 15). This permit is valid for up to 45 days, opens the right to work, social benefits, education, and allows them to open healthcare insurance, as will be presented in detail in the following sections.¹³³ The local police conducts a 'check' if the person effectively resides at the given address. Once this is confirmed, the person is asked to present themselves again at the municipality to pick up the residence permit (A-card).¹³⁴

The time this process takes (from the first appointment with the municipality to obtaining the residence permit) significantly varies depending on the municipality. Where this process takes longer than 45 days, the temporary residence permit (annex 15) needs to be renewed.

A primary obstacle in obtaining the A-card is related to the ability to find a reception place / house so that registration at the municipality is possible in order to obtain a residency card (to this effect see [housing](#)).

It is possible for TP beneficiaries in Belgium to move to another member state and receive temporary protection there. The rights and social benefits the person enjoyed in Belgium must consequently be terminated. Municipalities are advised to make concrete arrangements for the person's departure during

¹²⁶ IO, *Temporary Protection, (A-card)*, available in Dutch, French and English [here](#).

¹²⁷ IO, information provided in March 2026, number of persons registered in the Alien register on 31 December 2025.

¹²⁸ Article 59/27 Foreign nationals Act, available in Dutch and French at: <https://bit.ly/3YaTMyC>.

¹²⁹ IO, information provided on 5 April 2025.

¹³⁰ IO, email, information provided on 5 April 2024.

¹³¹ IO, *Temporary protection, monthly statistics*, March 2026, available in Dutch, French and English [here](#).

¹³² Parliamentary Question [Flemish Government], no. 138, 4 February 2025.

¹³³ Institute for health and disability insurance (RIZIV), 'Circular: right to medical care for displaced persons from Ukraine', 15 March 2022, available in Dutch at: <https://bit.ly/3IlpY6J>.

¹³⁴ Article 52/2 §2, Royal Decree, 8 October 1981, available in Dutch and French at: <https://bit.ly/408uhA9>.

the initial registration.¹³⁵ The person should notify their municipality of the departure so that the person can be removed from the registers, meaning that their A-card will no longer be valid. Through the registration platform on a European level, which was introduced at the end of May 2022, Belgium can exchange relevant information with other member states.¹³⁶

Persons who do return to Belgium will have to find a new address and will have to go through the process of registering at the municipality again. If the Immigration Office was informed that a person received temporary protection in another member state, the person will have to reapply for temporary protection. The municipality is therefore advised to check with the Immigration office about the status of temporary protection before issuing a new A-card. The municipality cannot revoke the temporary protection status; they may only annul the person from the register because they cannot be found at the last given address or have left Belgium. Only when the temporary protection status has been revoked by the Immigration Office should the person again register at the registration centre in Brussels.¹³⁷ Here there may be some confusion, as it may be unclear to the person whether he or she has only been ‘annulled’ or has also lost temporary protection status.

2. Access to asylum

There is no restriction to the right to apply for international protection for people who have been granted – or are entitled to – temporary protection, as well as those who have been refused temporary protection.¹³⁸ However, the examination of the application for international protection of a temporary protection holder is suspended until the temporary protection regime ends at the European level.¹³⁹ The same applies to Ukrainian nationals; while the law does not prescribe that the procedure should be suspended for Ukrainian nationals,¹⁴⁰ the CGRS has ‘frozen’ their requests for international protection.¹⁴¹ For Ukrainians with double Ukrainian & Russian nationality, the examination is equally frozen. For Ukrainians with double nationality from another country, the examination is frozen only if they have obtained temporary protection.¹⁴² Because of these reasons, in 2025, only 2 persons with Ukrainian nationality have received refugee status.¹⁴³ The cases considered minors with third country national parents (other than Ukrainian).¹⁴⁴ This means that for Ukrainians who do not fall under the scope of temporary protection, the available procedural routes leading to a residence permit are considerably restricted. As for third country nationals (for example persons with refugee status in Ukraine), the international protection procedure is equally frozen if they have an active TP status.¹⁴⁵ However, if they apply for international protection, the fact that their application is not examined does not restrict their right to reception in a Fedasil reception centre while in procedure,¹⁴⁶ as well as other rights such as the right to work after 4 months in procedure, the right to medical reimbursement, etc. Nonetheless, due to the ongoing reception crisis in Belgium,¹⁴⁷ some (primarily single men) persons falling outside the scope of temporary protection will not be able to immediately benefit from reception and the socio-financial support under the regular international protection framework (see AIDA report Belgium on international protection).

¹³⁵ Communication from the Flemish government support team on Ukraine (VLOT) to the municipalities, 13 September 2022.

¹³⁶ Myria, ‘*contact meeting*’, 15 June 2022, available in French and Dutch at: <https://bit.ly/3XMDJHv>, 20.

¹³⁷ Immigration Office in response to inquiry Vluchtelingenwerk, 2 March 2023.

¹³⁸ Article 50 Foreign nationals Act; Article 17 of the Temporary Protection Directive.

¹³⁹ Article 51/9 Foreign nationals Act, in line with article 17(2) of the Temporary Protection Directive.

¹⁴⁰ Article 51/9 mentions ‘persons who enjoy temporary protection’ and not specifically ‘Ukrainian nationals’.

¹⁴¹ See also CGRS, ‘*Ukraine - state of affairs regarding applications for protection in Belgium*’, 17 March 2022, available at <https://bit.ly/3WWEHA4>, and Myria, ‘*contact meeting*’, 19 June 2024, available in Dutch and French [here](#), 19.

¹⁴² Myria, *contact meeting*, 21 June 2023, available in French and Dutch at: <https://bit.ly/3UHEQjF>, 17.

¹⁴³ CGRS, numbers provided in April 2026.

¹⁴⁴ Information provided by the CGRS, May 2026.

¹⁴⁵ As confirmed by the CGRS, May 2026.

¹⁴⁶ Article 6(1) Reception Act, available in Dutch and French at: <https://bit.ly/3Ycznc6>.

¹⁴⁷ See: ECRE, ‘Belgium: failure to deal with Persistent Reception Crisis is Attack on the Rule of Law’, 13 January 2023, available at: <http://bit.ly/3KPIQ6e>; The Brussels Times, ‘Despite 6000 convictions, Belgium still refuses to tackle reception crisis’, 23 January 2023, available in English at: <http://bit.ly/3YadjPq>.

It is important to note that for those applicants that do not have temporary protection when applying for international protection, the Dublin regulation is applied, even when they have Ukrainian nationality.¹⁴⁸ Before, Dublin was only applied to non-Ukrainian nationals.¹⁴⁹ In 2025, from January until August, 8 Dublin decisions were given to Ukrainian nationals.¹⁵⁰ If the person has family members in Belgium with Temporary protection, Belgium can make use of article 16 or article 17 of the Dublin regulation (dependency and sovereignty clausula) if there are effectively elements of dependency.¹⁵¹

B. Family reunification

1. Family member with a right to temporary protection

A distinction needs to be made between those who have a right to temporary protection as family members,¹⁵² and persons who do not fall under the scope of temporary protection but can apply for family reunification.¹⁵³

Family members of persons enjoying temporary protection should always first check whether they themselves do not fall under the scope of the TPD, meaning those who resided in Ukraine before 24 February and are:

- ❖ Ukrainian nationals; or
- ❖ Stateless persons or TCNs who enjoyed international protection; or
- ❖ Their family members.

For the family members, in order to come under the scope of temporary protection, they must have been in Ukraine before 24 February 2022 and they must have been, as is stipulated under article 2 (4) of the TPD, part of the family unit in Ukraine. The family member who themselves falls under the scope of article 2 (4) of the directive can request temporary protection at the registration centre or from abroad (see further below).

It is important to mention that, for the category of 'other family members'¹⁵⁴ who lived with the family at the time of the invasion and who were completely or mainly dependent on that relative, there is a 'de facto appreciation'.¹⁵⁵ The Immigration Office only specifies that 'the decision to grant a residence permit to this 'other family members category' will take into consideration the exceptional difficulties they would encounter if the reunification of these family members would not be allowed.'¹⁵⁶ This is a case-by-case evaluation.¹⁵⁷ 'Belonging' to the family unit at the time of the outbreak is not sufficient, but special bonds of dependency have to be demonstrated.¹⁵⁸ The assessment of dependency is based on a possible breach of article 8 ECHR (right to private and family life).¹⁵⁹ Normal links of affection between family

¹⁴⁸ Response from Immigration Office after enquiry application of Dublin to Ukrainian nationals, 24 July 2024.

¹⁴⁹ Myria, *Contact meeting*, 23 March 2022, available in Dutch and French [here](#), 14.

¹⁵⁰ Myria, *Contact meeting*, 17 September 2025, available in French and Dutch [here](#), 16.

¹⁵¹ Myria, *Contact meeting*, 19 November 2025, available in French and Dutch [here](#), 6.

¹⁵² Article 2(4) Council implementing decision establishing the existence of a mass influx of persons displaced from Ukraine, 4 March 2022, available at: <http://bit.ly/3ZuzZuN> & Article 57/34 §1 Foreign nationals Act
¹⁵³ Article 10bis §2/1 Foreign nationals Act.

¹⁵⁴ As referred to under article 2 (4) c, of the implementing decision.

¹⁵⁵ Article 57/34 § 3 Foreign nationals Act. The Cabinet in response to inquiry Caritas regarding the application of 'other family members', 22 March 2022. The draft law (Chamber of representatives, *Wetsontwerp*, 1 October 2002, available in French and Dutch at: <https://bit.ly/3IF11vd>, 29) equally makes a clear distinction between 'members of the core family' on the one side and 'other family members' on the other side.

¹⁵⁶ Chamber of representatives, *Wetsontwerp*, 1 October 2002, available in French and Dutch at: <https://bit.ly/3IF11vd>, 29-30.

¹⁵⁷ Immigration Office in response to inquiry Vluchtelingenwerk on the interpretation of 'other family members', 1 December 2022.

¹⁵⁸ CALL, nr. 292.757, 9 August 2023, available in French at: <https://tinyurl.com/yc2bdpwp>, 7.

¹⁵⁹ CALL, nr. 295.288, 10 October 2023, available in Dutch at: <https://tinyurl.com/efry9>, 9; CALL, nr. 292.757, 9 August 2023, available in French at: <https://tinyurl.com/yc2bdpwp>, 8.

members are not sufficient in the context of an article 8 breach and additional elements of dependency need to be proven.¹⁶⁰

Lastly, the beneficiary, who falls under Article 2 (1) a & b of the implementing decision, needs to be present in order for the family member to obtain temporary protection themselves. In one case, a non-Ukrainian national who was married to a Ukrainian person and was part of the family before 24 February did not receive temporary protection because his Ukrainian spouse was not present with him in Belgium.¹⁶¹ The spouse from which his temporary protection stemmed/derived could not be considered as displaced in the sense of article 2 of the Implementing decision considering she was still in Ukraine.¹⁶² Moreover, the Immigration Office in this case is not capable of examining if the family bond is still existent at the moment of application.¹⁶³ In a case from January 2023, the CALL at first considered these criteria to be illegitimate, stating that the Council implementing decision as well as the directive do not require the family member to be present in the Member state. This case concerned a man whose spouse was a nurse and could therefore not leave Ukraine.¹⁶⁴ However, the CALL changed its view in a case in July 2023 regarding a non-Ukrainian national whose spouse was still in Ukraine. Article 2 of the implementing decision requires that the person has been 'displaced'. As a consequence, a family member of someone who is still in Ukraine (and thus not displaced) does not have a right to TP.¹⁶⁵

Application from abroad

Additionally, it is possible to apply for Temporary protection from abroad (outside the EU) in very specific situations. If you are a **family member** of a beneficiary, you can apply from abroad if:

- The family already existed in Ukraine before the outbreak of the war
- The family got separated because of the war
- The person has the right to temporary protection¹⁶⁶

The law contains no further information on the practical application of this, and merely says that these persons, as far as they are outside of the EU, may 'request an authorization for a residence permit based on temporary protection from abroad'.¹⁶⁷ As Ukrainian nationals enjoy visa free travel, in practice this option is applicable to only very specific cases of third country nationals being separated from their family. The assessment is that there are very few to no applications based on this article.

2. Family reunification with a TP beneficiary

Before, it was possible for a family member of a person enjoying temporary protection to apply for a derived status without any other condition than providing proof of the family ties. However, a new law was passed on 1 October 2024,¹⁶⁸ resulting in stricter conditions to obtain a derived status. On 18 August of 2025, more law changes heavily altered family reunification with a beneficiary of TP, introducing an entirely new article in the Foreign nationals Act (article 10bis §2/1) applicable to family reunification with beneficiaries of subsidiary protection and temporary protection.¹⁶⁹

The new legal provisions are applicable to persons having obtained temporary protection after 18 August 2025. This means that different conditions on family reunification can be applicable, depending on when the beneficiary received TP. In practice, this has led to confusion not only for applicants, but also at the

¹⁶⁰ CALL, 297.070, 14 November 2023, p.4, available in French at: <https://tinyurl.com/2dder2ry>.

¹⁶¹ CALL, nr. 292.471, 28 July 2023, p.2, available in Dutch at: <https://tinyurl.com/27mx5scv>.

¹⁶² *Ibid*, 7.

¹⁶³ *Ibid*, 3.

¹⁶⁴ CALL, nr. 283.740, 2 January 2023, available in French at: <https://tinyurl.com/yc42bmuk>, 5.

¹⁶⁵ See CALL, nr. 292.471, 28 July 2023, available in Dutch at: <https://tinyurl.com/27mx5scv>, 7.

¹⁶⁶ As defined under article 2 of the implementing decision.

¹⁶⁷ Foreign nationals Act, Article 57/34 §1.

¹⁶⁸ Interior Affairs, *Act amending the Act of December 15, 1980 on entry to the territory, residence, establishment and removal of aliens on the right to family reunification (1)*, 10 March 2024, available in Dutch and French [here](#).

¹⁶⁹ For an explanation on the different legal regimes for children born in Ukraine after the war, see also; Myria, 'contact meeting', 17 September 2025, available in Dutch and French [here](#), 16.

level of the municipality. The Infoline has observed at least one case of a municipality imposing conditions before transferring the application to the Immigration Office, of which the applicant should in fact, have been exempted.

The following persons can do family reunification with a beneficiary of temporary protection:

- ❖ The spouse
- ❖ The registered partner
- ❖ The minor children
- ❖ The disabled minor child

There is thus no possibility to do family reunification with a child that has temporary protection.

Family reunification with a person who received Temporary protection before 18 August 2025¹⁷⁰

The requirements are as follows per category:

- ❖ Spouse & registered partner
 - Person comes to live with the beneficiary of TP
 - Both are over 21 years, or 18 if the marriage already existed before arrival in Belgium
 - If they have registered partnership, they additionally have to proof that their relationship is durable
- ❖ Minor child:
 - If the child is born in Belgium out parents or a parent with TP, the child automatically receives a right of residence deducted from the parents without any further conditions¹⁷¹
 - If the child is born outside of Belgium:
 - The child cannot be married
 - Has to come live with the parents until the age of 18
 - If the child is only reunited with one parent, dependency of that parent or his/her spouse or registered must be proven, as well as parental authority. The other parent must also consent if parental authority is shared. If the parent is 'missing' this has to be confirmed by the Ukrainian authorities.¹⁷²
- ❖ Adult disabled child
 - Must be above the age of 18
 - Must have a certificate from registered doctor that shows the person is unable to support him/herself
 - The child is not married

With the exception of the minor children born in Belgium, the beneficiary must also prove:

- ❖ to have sufficient housing
- ❖ Sufficient financial means (2,173,88 net a month for 2026)
- ❖ Healthcare insurance that can also cover the family member

Family reunification with a person who received temporary protection after 18 August 2025¹⁷³

Persons who apply for family reunification with a beneficiary that has obtained his status after 18 August 2025, must wait 2 years since the granting of TP before they can apply for family reunification. Moreover, must the family already have existed prior to arrival in Belgium.¹⁷⁴

This means that they will only be able to apply for family reunification starting from 18 August 2027, while temporary protection currently only runs until March 2027.

¹⁷⁰ Former article 10bis §2 Foreign nationals Act, covered under the transitional measures provided by the Law of 18 July 2025 amending the law of 15 December 1980 (Foreign nationals Act), article 24 §3 1°.

¹⁷¹ IO, Internal instruction to the municipalities, 31 August 2017, for more information, see Agii, '*registration of foreign children born in Belgium*', [last updated] September 2017, available in Dutch [here](#).

¹⁷² See CALL, nr. 333 322, 29 September 2025, available in Dutch [here](#).

¹⁷³ Law of 18 July 2025 amending the law of 15 December 1980 (Foreign nationals Act), 18 July 2025, available in French, Dutch and German [here](#).

¹⁷⁴ Article 10bis §2/1 Foreign nationals Act.

There is an exception for minor children or disabled adult children when they are the ONLY family members that apply for family reunification. When a child applies for family reunification along with the parent (thus the spouse of the reference person), the waiting period of 2 years still applies.

The reference person must equally provide proof of:¹⁷⁵

- ❖ Sufficient housing
- ❖ Sufficient financial means - 2,408.net + 10% with each dependent child.
 - when the parent is joined only by the minor child or adult disabled child, this condition is waived.
 - If the person doesn't meet this income criteria, the application cannot be automatically denied, but a "needs assessment" is carried out by the immigration office.
- ❖ Healthcare insurance that can also cover the family members.

Children born in Belgium out of (a) parent(s) with temporary protection, derive their residence right of their parents without further conditions.¹⁷⁶

In practice, children born after the war (outside of Belgium) have great difficulties of obtaining a residence permit. They do not receive temporary protection, as they are not considered to fall under the scope of the temporary protection implementing decision. When born in Belgium, they derive status from their parent(s). However, children born after the war outside of Belgium have to rely on family reunification, which comes with the above-mentioned conditions. Especially for parents who obtained TP before the law change of 18 August 2025, it is very difficult to prove a sufficient and stable income. There has been one known case to Vluchtelingenwerk of a child in such situation having applied for and received a residence permit based on humanitarian regularisation.¹⁷⁷

Another issue is that family reunification can only be applied for at the municipality if the person that applies for it, is in legal stay. This means that a child born abroad, upon entry of the Schengen zone, must apply for family reunification within three months. If this is not the case, exceptional circumstances must be proven as to why the child cannot apply for family reunification at the competent Belgian embassy abroad.¹⁷⁸

An example of a case signalled to the Infoline was a mother who received TP after 18 august 2025, with a child born in Ukraine after the war. The municipality refused to transfer the application for family reunification to the Immigration Office because the application did not contain proof of sufficient and stable income. The law however foresees an exception to the income requirement, of which the municipality was seemingly not aware.¹⁷⁹

In another case a mother received TP but the child (born in Ukraine after the war) did not. The mother was residing in emergency reception the first two months, where domiciliation was not possible. When she found local housing, the appointment for the residence permit (A-card of the mother) was only given when the three months of legal stay of the child had already expired. In such circumstances, the mother had to provide proof of exceptional circumstances as to why the application was not possible at the competent embassy. The mother, nor the municipality where aware of this condition, and the Immigration Office indicated that in the absence of such proof, the application would potentially be refused.¹⁸⁰

¹⁷⁵ Article 10bis §2/1 1°-3° Foreign nationals Act.

¹⁷⁶ IO, Internal instruction to the municipalities, 31 August 2017, for more information, see Agii, '*registration of foreign children born in Belgium*', [last updated] September 2017, available in Dutch [here](#).

¹⁷⁷ Information obtained by Caritas International, 2026.

¹⁷⁸ Article 12bis §1 3° Foreign nationals Act.

¹⁷⁹ Case signaled to the infoline in 2026.

¹⁸⁰ Case signaled to the infoline in 2026.

The multitude of procedures, applicable laws, and the severe lack of information available to the applicant, in practice lead to prolonged situations of children born outside Belgium after the war being in irregular stay. So far, despite numerous signals,¹⁸¹ nothing has been done to remedy this situation.

C. Movement and mobility

Beneficiaries are not subjected to any territorial restrictions imposed by Belgium in terms of freedom of movement within the Schengen zone. Based on their residence permit and biometric passport, they may travel freely in the Schengen zone for three months within 180 days.¹⁸²

There are however some obstacles for persons enjoying benefits from the social welfare centre. In this regard, there are limited national guidelines, and social welfare centres are left a significant degree of autonomy. Most welfare centres apply the rule applicable under the law on the right to social integration (*“wet maatschappelijke integratie”*) by analogy. Under this law, beneficiaries may leave the country for 28 days within a year without losing the right to social benefits. However, the municipality should be notified when the time spent abroad is longer than a week.¹⁸³ Welfare centres might nevertheless apply stricter rules, as they are not subject to specific obligations within the existing legal framework.¹⁸⁴

TP beneficiaries don't always seem to be informed of these travel and notification rules, especially since the application thereof might differ depending on the municipality involved. This can equally have implications on the residence status. In the absence of communication to the municipality, there have been cases in which the municipality incorrectly assumed that the person had left the territory indefinitely, while they had, in fact, only left for a relatively short time.¹⁸⁵ Removal from the register by the municipality however does not mean the person loses temporary protection, as mentioned. More recently, this situation seems to have gotten better, as there have been few to no reports to the Infoline concerning people who were not informed about travel rules.¹⁸⁶

The absence rules regarding social benefits aside, under the Belgian Foreign nationals Act there is in principle no obligation to notify the municipality of absences under three months as this should not affect people's residence status.¹⁸⁷ In the following cases, the municipality has to check with the Immigration Office that the person still enjoys temporary protection before prolonging or issuing a residence permit:

- ❖ The residence permit (A-card) was not renewed before the expiration date;
- ❖ The temporary protection certificate is older than three months;
- ❖ The person was struck from the registers (for example because of it was assumed the person had moved abroad).¹⁸⁸

¹⁸¹ See ; Tex van Berlaer, *‘what have Ukrainian baby’s done wrong ?’*, Knack, 21 April 2026, available in Dutch [here](#); Fien Macken, *‘We don’t feel welcome at all, son of Hannah does not receive temporary protection’*, VRT NWS, 25 February 2026, available in Dutch [here](#); Visit Ukraine, *‘Belgium is denying Temporary Protection to Ukrainian children born after 2022: what is the reason?’* 31 March 2026, available in English and Ukrainian [here](#). Alice Dulczewski & Anne-Sophie Bruyndonckx, *‘After four years of war in Ukraine, some refugees in Belgium—including young children—do not have protection status’*, RTBF, 22 February 2026, available in French [here](#).

¹⁸² Article 21, *Schengen acquis*, 22 September 2000, available at: <http://bit.ly/3Y7qVve>.

¹⁸³ Article 23 §5 Law on the right to social integration, 26 May 2002, available in Dutch and French at: <https://bit.ly/3WP7Mxg>; Circular POD MI, *omzendbrief inzake het recht op maatschappelijke integratie bij verblijf in het buitenland*, available in Dutch, French and English at: <https://tinyurl.com/bddfsh47>.

¹⁸⁴ Flemish Codex, *Organieke wet van 8 juli 1976 betreffende de openbare centra voor maatschappelijk welzijn*, available in Dutch at: <https://tinyurl.com/mvf7xhd4>.

¹⁸⁵ This information was received as a case handled by the VVV Infoline.

¹⁸⁶ Agii, pt. 2.3.3.3 *Electronic A card and duration of temporary protection*, available at in Dutch at: <https://tinyurl.com/43ej4fdn>; see also The Commission, *Frequently asked questions on interpreting the Temporary Protection Directive and Council Implementing Decision*, 2022, available at: <https://bit.ly/3RnvY8D>, 7; and IBZ, *Circular: temporary protection – renewal A-card*, 16 November 2022, available in Dutch at: <https://bit.ly/3ZrSSi2>.

¹⁸⁷ Foreign nationals Act Article 39 §2 §3 §6 Foreign nationals Act available in Dutch and French at: <https://bit.ly/3YaTMyC>.

¹⁸⁸ IO, information provided on 6 February 2024.

There have been cases of a municipality not willing to register a person again after the person has been annulled from the registers. They may be wrongfully redirected to the registration centre, while their temporary protection is still active.¹⁸⁹ Municipalities in such cases should check with the Immigration Office to verify the status of the Temporary protection. These persons can also not return to the registration centre to express their housing need, as people who already have the temporary protection status are not again given access to the registration centre. To avoid such situations, persons with temporary protection are advised to always communicate their travel destination and intentions, including a possible return, clearly to the municipality.

In Flanders, there are no deadlines imposed on municipalities for keeping a reception place available during a person's absence. Municipalities are merely advised to 'transparently provide information on the rules regarding housing and payment of social benefits.'¹⁹⁰ In Wallonia however, it is clearly indicated that if the stay abroad is less than three months, the accommodation should always be considered as occupied and may thus not be made available for another family.¹⁹¹

Considering the ambiguities and non-existence of a harmonised approach in dealing with absence in different municipalities, the need for communication of periods of absence to the municipality is very important in order to not face any unexpected obstacles upon return.

D. Housing

Indicators: Housing

1. For how long are temporary protection beneficiaries entitled to stay in reception centres?
No specific time limit
2. Number of beneficiaries staying in reception centres up until 13 June 2025
3,026 persons in Flanders¹⁹²
3. Number of beneficiaries staying in private accommodation as of 31 December 2024
Not available

Reception upon arrival

The right to reception of people with temporary protection is regulated in the reception law. It foresees that the federal Agency for the Reception of Asylum Seekers (Fedasil) assigns a 'compulsory place of registration'.¹⁹³ More specifically, this means that beneficiaries have the right to financial support from the social welfare centre.¹⁹⁴ On this basis, Fedasil considers itself to only be responsible for referral to a reception place that has been provided and put forward by a municipality, and to provide emergency accommodation until that time.¹⁹⁵

The procedure is as follows: persons can state at the registration centre that they are in need of reception. They should then – in theory – receive a place in Fedasil's emergency reception centre, called Ariane. Currently, Ariane has a capacity of 250 places.¹⁹⁶ Local municipalities should make their offer of reception places known in the "housing tool". The Flemish Taskforce on Ukraine is in contact with the municipalities, and passes on the availability of local reception places to Fedasil on a weekly basis. Fedasil will then see if there is a match between the places offered and the persons/families residing in Ariane. If a match is

¹⁸⁹ Several cases reported to the Infoline also throughout 2025.

¹⁹⁰ Communication from the Flemish government support team on Ukraine (VLOT) to the municipalities, 13 September 2022.

¹⁹¹ Coordination unit of the Walloon Region for the reception of Ukrainian refugees, 'Practical guide for support of Ukrainian refugees', October 2022, available in French at: <https://bit.ly/3Jrg6js>, 21.

¹⁹² Parliamentary Question [Flemish Government] no. 3956, 'on the future of temporary displaced persons', 1 July 2025, available in Dutch [here](https://bit.ly/3Jrg6js).

¹⁹³ Art. 10 §1, °1 reception law, available in French and Dutch at: <https://tinyurl.com/ycxxr6ae>.

¹⁹⁴ Art. 8 §1 and 11 §2 reception law, available in French and Dutch at: <https://tinyurl.com/ycxxr6ae>.

¹⁹⁵ Myria, 'Contact meeting', 29 November 2023, available in French and Dutch at: <https://tinyurl.com/bddjh49c>.

¹⁹⁶ Confirmed by Fedasil, February 2025.

found Fedasil will directly contact the municipality about the transfer from the emergency centre to the local reception place.¹⁹⁷ In 2026 536 persons were transferred from the emergency centre Ariane to the local level, of which: 325 persons to Wallonia, 211 to Flanders, and 0 to Brussels.¹⁹⁸

However, in practice the process is not as straightforward, and certain obstacles arise which has led to persons not being able to obtain a place in a reception centre and having to find alternatives such as the emergency centre provided by Ukrainian Voices.¹⁹⁹

Since the start of temporary protection, 78% of applicants have indicated not having a reception need upon arrival.²⁰⁰ This reception need has declined overtime: in December 2024 the estimation was that 15% of the persons indicate a need for reception upon arrival.²⁰¹ They often make use of their network or are financially able to immediately find and rent something on the private housing market.²⁰² It is important to note that people can only indicate a need for reception on the day of arrival; Fedasil will not consider itself responsible for people who have already progressed to the local level.²⁰³

For the estimated 15% (and at the time of writing likely less) who indicate a housing need, however, there is no guarantee of a reception place. Already in the summer of 2022, there were reports that the emergency centre of Ariane was becoming saturated, and as a result, referrals to Ariane were only made for people considered vulnerable (exceptions aside).²⁰⁴ Since then, the profiles of people eligible for emergency reception, as well as the availability of places, has fluctuated. Thus, emergency reception could never be 100% guaranteed for any group. In September 2024 single men were excluded from Ariane.²⁰⁵ Currently, the number of single men being able to receive reception at Ariane is limited.²⁰⁶ Generally speaking, the situation was quite critical in September 2024 because of increasing waiting times for an invitation (see [Registration](#)) and applicants for temporary protection were also present in regular homeless shelters,²⁰⁷ although this problem seems to be limited to Brussels. In November 2024 not everyone received reception,²⁰⁸ while in December 2024 the problem was slightly less present, with around 5 people who indicated a need not receiving reception during the course of the month.²⁰⁹ The authorities stated in January 2025 that the current needs for reception could be accommodated for, and that future needs could be addressed depending on the inflow of persons in need of reception.²¹⁰ However, it has been observed in practice that only a limited number of persons receive reception,²¹¹ and it has been confirmed that not everyone requesting reception upon registration receives reception.²¹² Access to reception is dependent on vulnerability criteria such as minors, families with minor children, single or pregnant mothers, persons with medical needs and elderly persons.²¹³

¹⁹⁷ Flemish Task Force (VLOT), extra information provided on the 'Flemish government Decree of 6 December 2024', available in Dutch [here](#), 23 January 2025.

¹⁹⁸ Fedasil, information provided March 2026. No numbers were given for Brussels, but the assumed transfers to Brussels are 0 considering the transfers to Flanders and Wallonia are equal to the total number of transfers.

¹⁹⁹ IO, following an enquiry by Vluchtelingenwerk as to whether there is always a reception place for vulnerable persons who indicate a reception need, 14 September 2023.

²⁰⁰ Statbel, *Displaced persons from Ukraine* (numbers up until January 2024), available in English at: <https://bit.ly/3ZmG5O4>. Numbers have not been updated anymore after March 2024.

²⁰¹ *Parliamentary Question [Flemish Parliament] no. 53, 5 December 2024*. See also Myria, 'contact meeting', 29 January 2025, p.58, available in French and Dutch [here](#).

²⁰² Also noted by Minister Crevits, parliamentary Question [Flemish government] no. 3956, 'the future of temporary displaced persons', 1 July 2025, available in Dutch [here](#).

²⁰³ Confirmed by a case referred to the Infoline, of a 28-year old woman who could not regain access to registration centre for a reception request, 7 August 2023.

²⁰⁴ Myria, *contact meeting*, 18 October 2023, available in Dutch and French [here](#).

²⁰⁵ Observation Vluchtelingenwerk Registration Centre, 17 September 2024.

²⁰⁶ Flemish Taskforce Ukraine (VLOT), 9 March 2026.

²⁰⁷ Flemish Taskforce Ukraine (VLOT), information on reception situation, 17 December 2025, Observation Samu Social, 26 January 2023 and, see for example: The Brussels Times; *Ukrainian refugees left sleeping rough again due to Belgian shelter crisis*, 22 October 2024, available in English [here](#).

²⁰⁸ Caritas, Visit report [internal document], 30 October 2024.

²⁰⁹ Myria, 'contact meeting', 29 January 2024.

²¹⁰ Myria, 'contact meeting', 29 January 2025, available in Dutch and French [here](#), 57.

²¹¹ Based on observations by Caritas International, Ukrainian Voices and Vluchtelingenwerk at the registration centre throughout 2025.

²¹² As confirmed by Fedasil, March 2026.

²¹³ Information provided by Fedasil March 2026.

For persons who have registered for temporary protection before but were ‘annulled’ from the registers after a return to Ukraine, there seems to be no consistent policy, as there have been cases of families who did receive reception in Ariane after having re-registered, but others did not.²¹⁴

Ukrainian voices, along with the Brussels government has approximately 200 places across 200 ‘emergency reception’ centres. These serve as a back-up when Fedasil is not able to accommodate everyone at the Ariane reception centre. Unlike Fedasil, these emergency places can be made available to persons who have not received their temporary protection certificate yet but have received an invitation or a registration document (see [Registration](#)). This is however not the case for all 200 reception places: each emergency centre has different conditions, such as having a registration in Brussels, only one-night stay, etc. They may also host specific profiles, such as persons with limited mobility, as well as groups at greater risk of contracting contagious diseases such as chickenpox (of which there have been outbreaks in Ariane in the past).²¹⁵

However, because of the limited places there is equally no guarantee of reception as the emergency accommodation can be limited to specific profiles. There is direct communication between Fedasil and these emergency reception centres to accommodate for a transfer to the Ariane reception centre or the local level when places open up.²¹⁶ In 2025, 153 persons transferred from emergency reception to Ariane reception centre.²¹⁷ As Fedasil cannot always provide them with a place and their stay at the emergency reception may be limited, this means that people may be left without an immediate solution and without further follow-up by the authorities.²¹⁸

The problems are aggravated by the equally fluctuating waiting times for registration (see [Registration](#)). While people wait for registration, Fedasil does not usually take responsibility as these people as they have no temporary protection yet.²¹⁹ As mentioned (see [registration under Temporary Protection](#)) persons are not always able to register the same day, leaving them without access to Fedasil emergency reception in Ariane.²²⁰

Furthermore, the outflow out of Ariane remains difficult. This outflow is impacted by the fact that local reception places are limited and have been reduced consistently over time. It is equally not possible for municipalities to register to new places in the housing tool as of 1 January 2025 (see [Housing](#)).

Lastly, the responsibilities between the local and federal level are not always clear. There have been several cases also throughout 2025 of persons going back to the registration centre to ask for reception, even after they had already progressed to the local level. However, reception at Ariane can usually only be requested upon initial arrival in Belgium.

While it is argued that people enjoying temporary protection immediately have all the rights connected to residence, it is unclear how they are ‘supposed to find their way’. This means that persons with reception needs who cannot count on friends or family to live with might encounter difficulties in registering their address of residency. While it has been stated that persons with reception needs currently are able to access Fedasil or emergency accommodation, such situations are concerning, as this does not allow them to obtain a residence permit, regardless of their condition as beneficiaries.²²¹

²¹⁴ Caritas, Visit report [internal document], 7 November & 30 October: a family who had returned after a visit to Ukraine and who had been deleted from the registers did not receive reception by Fedasil, while on 30 October that another family in a similar situation did receive reception by Fedasil.

²¹⁵ Fedasil, information provided in February 2025.

²¹⁶ *Ibid.*

²¹⁷ Fedasil, information provided March 2026; On-site observations by Vluchtelingenwerk in the course of 2024. Based on observations and follow-up at the registration centre by Vluchtelingenwerk and Caritas.

²¹⁹ Communication Flemish Task Force Ukraine (VLOT), 29 February 2024.

²²⁰ Observation Vluchtelingenwerk Registration centre.

²²¹ See for example: The Brussels Times, *Belgium’s reception crisis: Ukrainian refugees now also sleeping rough*, 18 November 2022, available at: <http://bit.ly/3KMcyZJ>.

Housing

The provision of accommodation for beneficiaries and the policies set up to that effect are relatively similar between the different regions of the country (Flanders, Brussels, and Wallonia). The information provided in the following section refers mainly to the region of Flanders (which hosts the majority of beneficiaries).

Article 13(1) of the Temporary Protection Directive states that the member states shall ensure that persons enjoying temporary protection have access to suitable accommodation, or, if necessary, have a right to receive the means to obtain housing. As of December 2025, approximately 59% of beneficiaries registered reside in Flanders, 18% in Wallonia, and 23% in Brussels.²²² At the onset of the conflict, many reception places were created at both the local and federal level to cope with the high number of arrivals from Ukraine. A rough estimate shows that 7,700 extra reception places were created in Flanders and 1,300 in Wallonia.²²³ In Flanders, general subsidies were provided depending on the type of reception place (see below). Mid-March 2024 approximately 5,600 persons were staying in reception centres in Flanders.²²⁴ This further decreased to 1851 persons in March 2026.²²⁵ There was a great focus on creating enough reception places, through the funding of emergency villages and calls for host families. This focus has however shifted to integration and participation-trajectories, through which beneficiaries were increasingly guided towards the private housing market. As a result, the offer of public reception places started to decrease significantly going back to mid-2023.

Since 1 January 2025, it is no longer possible for municipalities to create and thus offer new reception places through the housing tool, so there will be no increase in available places possible. This measure was taken along with other measures as part of the phasing out of public subsidised reception places towards March 2026.²²⁶ Other measures taken by the Flemish government to this account include:

- ❖ A one-time subsidy for each person a local municipality receives between 1 January 2025 and 1 April 2026, on the condition that the person resides in a local Emergency village or in Emergency reception owned and provided directly through the municipality or social welfare house. The person must have been referred through VLOT and/or Fedasil.
- ❖ A general decrease in the subsidies a municipality receives for each beneficiary registered.
- ❖ A one-time subsidy to the municipalities for each person in public reception on 1 January to incentivise the move to private housing.

Furthermore, as of April 2026 general subsidies for public shelter spaces provided by local governments and support subsidies will be discontinued. The emergency village in Ghent will serve as a central reception location for new temporarily displaced persons in need of shelter. Staying in the emergency village is temporary and aimed at transitioning to a sustainable housing solution distributed across Flanders.²²⁷

The offer of local reception places by the municipality is purely on a voluntary basis.

There are different types of accommodation: emergency accommodation, public reception places, and private accommodation (including accommodation with a host family). Each type of accommodation will be addressed more in detail below.

Emergency accommodation

The Ariane centre is organised by Fedasil in Brussels and is considered emergency accommodation. At the end of June 2022, the Ariane reception centre saw an increase of occupation up to almost 1,200

²²² Numbers provided by Flemish Task force (Vlot), March 2026.

²²³ Rough estimate by Fedasil, no definite publication of these numbers is available at the moment of writing.

²²⁴ Flemish Task Force Ukraine (VLOT) 13 March 2024, there are no numbers available for Brussels or Wallonia.

²²⁵ *Ibid*, numbers provided by VLOT, 9 March 2026.

²²⁶ Decision of the Flemish government on the subsidies for Temporary protection beneficiaries of 8 April 2022, Last amended on 6 December 2024, available in Dutch [here](#). See also for timeline on subsidies; Flemish government, 'Funding for shelter spaces for temporarily displaced persons', available in Dutch [here](#).

²²⁷ *Ibid*.

persons. In this period, the Ariane centre was used solely for temporary protection beneficiaries, a policy that was changed later on and resulted in the capacity for temporary protection beneficiaries being reduced to 250 in 2023. The capacity has been further reduced to 130 places (March 2026). In practice, people stay in Ariane for an average duration of 62 days.²²⁸ Referral to local reception may be difficult, especially when housing must abide by certain conditions tailored to the needs of the person with specific vulnerabilities such as persons with limited mobility,²²⁹ but also single men with medical conditions and large families.²³⁰ There have been cases of persons staying in Ariane for as long as five to six months.²³¹ As Ariane was initially meant to provide a short-term solution, the extended stay without any means to register has a negative impact on access to social, financial, and work rights.²³²

Apart, from the Ariane emergency reception centre, the Brussels government and Ukrainian Voices also provide several types of emergency accommodation, amounting to 200 places.

Public reception

Housing in public places broadly consists out of three categories:

- ❖ Emergency villages
- ❖ Emergency reception owned and provided directly through the municipality or social welfare house
- ❖ 'Other' public places

The emergency villages are generally owned by either the local municipality or other actors who made places available. At the beginning of the war, three bigger reception centres were set up to accommodate the new displaced persons: one in Antwerp, one in Mechelen and in Ghent that opened the beginning of May 2023.²³³ The centres in Antwerp and Mechelen had a capacity of 600 places each (expandable to 1,000 in the case of Antwerp).²³⁴ The one in Ghent has a capacity of 600 additional places.²³⁵ Wallonia does not have reception centres of similar scale. The reception facilities must at least provide for a bed in a shared room, with equally the possibility of the sanitary and kitchen spaces being common areas.²³⁶ The services offered at collective centres may differ, with some offering meals, clothing, medical support, etc.

As part of the plan to increasingly direct people towards the private housing market (see below), only the emergency village in Ghent is still operational and will continue to be operational until March 2027²³⁷. The reception centre in Mechelen closed in December 2024, while the reception centre in Antwerp completely closed in March 2025. At the beginning of March however, it was reported that some 128 beneficiaries had not managed to obtain a place on the private market, leading to the setting up of "city-camping", as well as concerns for persons ending up on the street.²³⁸

The emergency village in Ghent hosts 231 persons as of March 2026.²³⁹

²²⁸ Information provided by Fedasil, March 2026.

²²⁹ Myria, 'contact meeting', 21 September 2022, available in Dutch at: <https://bit.ly/3m5NaUA>, 50.

²³⁰ Observation by Flemish Task force Ukraine (Vlot), March 2024.

²³¹ Infoline case, February 2024.

²³² Myria, *Contact meeting*, 21 September 2022, available in Dutch at: <https://bit.ly/3m5NaUA>, 50.

²³³ The city of Ghent, 'Emergency village Ghent opens doors to ukrainians', 9 May 2023, available in Dutch at: <https://bit.ly/3VZ0ASc>.

²³⁴ See, The Brussels Times, available in English at: <http://bit.ly/3KBQzVe> and VRT News, available at: <http://bit.ly/40JhgN1>.

²³⁵ The city of Ghent, 'Emergency centre for Ukrainians', available in Dutch at: <http://bit.ly/3U8ea2N>.

²³⁶ Flanders regional government page, 'Rental for the reception of displaced persons from Ukraine', available in Dutch at: <http://bit.ly/3J3bSOU>.

²³⁷ Flemish government, 'Funding for shelter spaces for temporarily displaced persons', available in Dutch [here](#), as confirmed by Flemish Taskforce on Ukraine (VLOT), 9 March 2026.

²³⁸ See; Gazet van Antwerpen [newspaper], *128 Ukrainian refugees still looking for a house, emergency centre makes way for city camping*, 5 March 2025, available in Dutch [here](#), and; VRT New [news] *Three families in Antwerp Emergency centre receive eviction order from justice*, available in Dutch [here](#).

²³⁹ Flemish taskforce Ukraine (VLOT), 9 March 2026.

The second category consists of places set up by the local government itself or at the request of the local government. In March 2026, 1,430 persons were residing in such reception places in Flanders.²⁴⁰

The third category consists of ‘other public places’ such as hotels, B&B’s, holiday chalets, In March 2026, 190 persons in Flanders were staying in this category of reception.²⁴¹

Private housing

Beneficiaries can also rent on the private housing market. The feasibility of this highly depends on the financial means of the beneficiary and/or the benefits they receive. Equally, the temporary character of their status can negatively affect their chances on the private market.²⁴² The requirements concerning the quality of the house are slightly eased so that more housing options become available for beneficiaries. These eased norms apply to both private housing as well as social housing awaiting renovations, destruction, or sale. However, the housing should always meet a minimum standard in terms of safety and health; no derogations that would negatively affect these qualities are possible.²⁴³ Moreover, since 8 December 2024 it has been decided that if the person wants to be eligible for different types of rent subsidies or premiums, the housing must meet the standard requirements, and the ‘eased requirements’ do not apply.²⁴⁴

Regarding accommodation with a host family, in the beginning stages reception was mainly focused on stays in host families. This happened through the ‘temporary living’ (“tijdelijk wonen”) notification which made it possible for host families to host beneficiaries of temporary protection in their house while being legally considered to be separate entities.²⁴⁵ This meant that there was no negative impact on certain financial benefits of the host family. A campaign was launched and people could indicate they were open to host through the hashtag “#place available” (“#plekvrij”) in Flanders or (“#placedispo”) in Brussels and Wallonia. More recently however, the general observation seems to be that there are no new calls for host families²⁴⁶, and presumably many beneficiaries staying with host families have moved on to the private market. The number of Ukrainians residing in the private housing market is estimated to be increasing.²⁴⁷

The municipalities, when confronted with someone with a reception need or a need for relocation from the host family, are expected to undertake several steps to ensure that the person can access housing. If durable housing solutions are not available, nor temporary solutions such as local emergency housing, the municipalities are expected to contact neighbouring municipalities. If this is to no avail, they should contact the Flemish Task Force (VLOT) that would provide support in the search for a reception place.²⁴⁸ No such support team exists in Wallonia or Brussels. Municipalities however do not always make full use of their options to contact neighbouring municipalities or to contact VLOT. In practice however, in the majority of cases persons are expected to find housing themselves.

²⁴⁰ *Ibid.*

²⁴¹ *Ibid.*

²⁴² Obstacles identified by Orbit, specialised (amongst others) in housing for refugees.

²⁴³ Flemish Society for Social housing, *Temporary housing of Ukrainian refugees*, available in Dutch at: <https://bit.ly/3W1rJ73>.

²⁴⁴ Flemish government, *decision of the Flemish Government to grant a subsidy to local governments for building reception capacity for temporarily displaced persons*, Article 9, 8 April 2022, available in Dutch [here](#).

²⁴⁵ For Wallonia, see: *Proposition of place of residence*, available in French at: <http://bit.ly/3KURzE6>; for Flanders, see IBZ, ‘*Circular regarding the registration of Ukrainians in the registers under the temporary protection statute*’, 9 March 2022, available in Dutch at: <https://bit.ly/3JqlxPV>, 3.

²⁴⁶ Vluchtelingenwerk Vlaanderen has seen a significant decrease in questions related to host families, observation shared by VVSG (Flemish association for cities and municipalities), 28 February 2024, and confirmed by the Flemish minister of Interior Affairs, in response to parliamentary Question, 5 December 2024

²⁴⁷ Observation Flemish task force Ukraine (VLOT), 15 March 2024.

²⁴⁸ Communication from VLOT to the municipalities, 27 October 2022.

E. Employment and education

1. Access to the labour market

Beneficiaries with a residence permit (A-card) or annex 15 can legally work in Belgium.²⁴⁹ They may work both as an employee or a self-employed person. For jobs in government functions or regulated professions (dentistry, medicine,...) a diploma recognition is necessary.²⁵⁰ The temporary protection status exempts them from the obligation to obtain a special working permit to exercise activities as self-employed persons.²⁵¹ In total, 59% of Ukrainians with TP who registered as job seekers have worked between March 2022 and March 2026, and 39% of Ukrainians once registered as jobseekers are working end of March 2026.²⁵² For 2024, this was an average of 17% in Brussels 20% in Wallonia and 45% in Flanders. Approximately 10% of Ukrainians with TP in Flanders that have worked, worked as self-employed.²⁵³ Most Ukrainians with TP are active in the “business services” sector. This mainly concerns the cleaning sector. The “Wholesale and Retail Trade” and “Hospitality and Tourism” sectors also account for a large share.²⁵⁴ Ukrainians are referred to [a brochure by the agency for integration and citizenship](#) where they can find information about their working rights.²⁵⁵

Social benefits may (certain exceptions aside) be conditional upon ‘willingness to work’, such as providing adequate proof of job applications. The details of this obligation are decided on by the welfare centre.²⁵⁶ Beneficiaries can present themselves with their residence documents to one of the regional offices where they can register as a job seeker. In Flanders, this is VDAB; in Brussels, Actiris and Wallonia, Forem. However, for Flanders there is anyway an obligation to register as a job seeker for those who (1) are at working age, (2) enjoy temporary protection, (3) are registered in a Flemish municipality.²⁵⁷

There are various measures to facilitate access to the labour market of beneficiaries. While employers cannot specify the nationality of people they want to recruit to avoid discrimination, they can use hashtags to indicate that they are open to newly arrived employees in Belgium. In Flanders, this can be done through #werkplek vrij; in Brussels, through # Welcome.²⁵⁸ Wallonia has no such hashtag, although employers open to newcomers are encouraged to avoid imposing certain conditions such as language requirements, and use comprehensible, clear language in their vacancies.²⁵⁹ Other measures taken are info sessions VDAB in cooperation with the municipality, job fares specifically directed towards Ukrainians with TP, etc.²⁶⁰

The biggest obstacle in access to labour remains language, with 92% of Ukrainians indicating that this is a barrier for them.²⁶¹

²⁴⁹ Article 10, °6, Royal Decree, 2 September 2018, available in Dutch and French at: <https://bit.ly/3Y9wvqg>.

²⁵⁰ Naric, ‘Information on recognition of Ukrainian degrees’, available in Dutch at: <https://tinyurl.com/4ac5ww2v>.

²⁵¹ Article 1, °15 Royal Decree, 3 February 2003, available in French and Dutch at: <http://bit.ly/3mj78LC>.

²⁵² Numbers provided by VDAB, April 2026. These numbers reflect the cumulation of all “files” of Ukrainians having worked between March 2022 and March 2026, including thus “files” of Ukrainians that have potentially already left the country.

²⁵³ Numbers at the 1st of September 2024. Numbers provided by the VDAB, as calculated by Statbel/KSZ (“kruispunt databank sociale zekerheid”), March 2024. No numbers available for 2025.

²⁵⁴ Parliamentary Question [Flemish government] no. 609, ‘Ukrainians in Flanders – employment’, 21 March 2025.

²⁵⁵ Information VDAB enquiry Vluchtelingenwerk Vlaanderen about inform risks exploitation and rights, 6 March 2024.

²⁵⁶ Article 3 § 5, Law on the right to social integration, 26 May 2002, available in Dutch and French at: <https://bit.ly/3WP7Mxg>; see also Institution on social integration (POD MI), *FAQ on Ukraine*, 7, available in French and Dutch at: <https://bit.ly/3Rh1B3L>.

²⁵⁷ Flemish Government, *Devree on the Compulsory Subscription to the VDAB*, 21 April 2023, available at: <https://tinyurl.com/mr3pkxhu>.

²⁵⁸ Actiris, see: <http://bit.ly/3DrOdEn>.

²⁵⁹ Forem, see: <http://bit.ly/3Xlnk77>.

²⁶⁰ Parliamentary Question [Flemish Government] no. 946, ‘Ukrainian refugees, amount of Ukrainians with social benefits in the Kempen area’, 13 June 2025.

²⁶¹ Ukrainians enlisted as job seekers at VDAB (Flanders), Parliamentary question [Flemish Government] no. 143, ‘temporarily displaces Ukrainian job seekers’, 25 November 2024.

Regarding the labour rights, every worker in Belgium has enjoys the same rights regardless of their residence status.²⁶² Every sector has a minimum wage, and labour must always be remunerated. For questions, doubts or complaints, people can contact the inspection service (“*arbeidsinspectie*”) or their VDAB/Actiris/Forem contact person.

Beneficiaries also have the right but are not obligated to follow integration courses. Due to the great numbers of Ukrainians, these integration courses were organised online and specifically for Ukrainians. However, since 2024 Ukrainians in Brussels and Flanders can enrol in the regular ‘integration course’ and consequently also receive an ‘integration certificate’. This course consists of: social orientation, learning Dutch, trajectory to work and a participation and networking trajectory.²⁶³

Beneficiaries can apply with their attestation of temporary protection in combination with the A-card or the Annex 15.²⁶⁴

2. Access to education

All children between the ages of 5 and 18 residing in Belgium have the right to education, regardless of their residence status.²⁶⁵ Temporary protection beneficiaries are obliged to enrol in education within 60 days after registration in their municipality, regardless of whether this is distance learning (for which there are no formal obligations on specific subjects or books),²⁶⁶ or enrolment in the Belgian education system through home schooling or physical classes.²⁶⁷ Education has no age limit, although compulsory education ends at 18.²⁶⁸ For the school year 2025-2026, 2,253 Ukrainian children were enrolled in kindergarten, 4,052 in primary school, and 4,172 in secondary school in Flanders.²⁶⁹ In the same school year, in December 2025 there are 1,494 enrolments of Ukrainian nationals in Flemish higher education institutions,²⁷⁰ and 7,996 persons in adult education.²⁷¹ Numbers of children enrolled in ‘home education’ or distance learning remains limited to 194 Ukrainians in Flanders.²⁷²

For the French speaking schools (in Wallonia and Brussels), 6,475 Ukrainians are enrolled in compulsory education at the start of 2026. As for French speaking higher education institutions, 183 persons with Ukrainian nationality are enrolled in university education at the beginning of 2026 (no numbers available on other higher education institutions other than universities).²⁷³

All beneficiaries are entitled to education under the same conditions as nationals except for the diploma requirements: the degree obtained in a foreign country – contrary to Belgians – may not give direct access to a degree or additional exams or preparation programmes may be required.²⁷⁴ Some rules are more favourable for TP beneficiaries. For example, beneficiaries have the opportunity to, at any moment, file a declaration of home education. Those who prefer distance learning are exempted from the requirement

²⁶² Article 4 §1 & article 11, Law establishing sanctions and measures for employers of illegally staying third-country nationals, available in French and Dutch at: <https://bit.ly/3HkixsV>.

²⁶³ Flemish Agency for Integration and citizenship, *the Integration trajectory*, available in Dutch at: <https://bit.ly/4cR7dfo>.

²⁶⁴ See Agii (agency for integration and citizenship), pt. 3.8. *Scope of application*, available at: <https://tinyurl.com/43ej4fdn>, & Flemish government, *Flemish Decree on integration policy*, article 11 §1 °2, available in Dutch at: <https://tinyurl.com/4tp2p62h>.

²⁶⁵ GD/2003/03, *The right to education for children without legal residence*, 24 February 2003, available at: <http://bit.ly/3jpxYRb>.

²⁶⁶ Flemish Government, ‘*Home schooling for Ukrainians*’, available in Dutch at: <https://tinyurl.com/y2r8ry3f>

²⁶⁷ Article 1 § 7 Law of 29 June 1983 on compulsory education (amended 23 March 2019) available at: <http://bit.ly/3jpxYRb>.

²⁶⁸ *Ibid.*, article 1 §1.

²⁶⁹ Flemish government, ‘*Primary and secondary education part 2*’, available in Dutch [here](#); the numbers mentioned include persons with Ukrainian nationality as well as persons with temporary protection.

²⁷⁰ Flemish government, *higher education*, available in Dutch [here](#); numbers include

²⁷¹ Flemish Government, ‘*Adult education*’, available in Dutch [here](#).

²⁷² Parliamentary Question [Flemish government] no. 903, 19 June 2025

²⁷³ DH, Belga, ‘*Invasion of Ukraine - Nearly 6,500 Ukrainian children are currently enrolled in schools in the French Community of Belgium*’, 17 February 2026, available in French [here](#).

²⁷⁴ Article II.177 Codified Decree on higher education, 11 October 2013, available in Dutch at <http://bit.ly/3JxTwWJ>.

to take exams unlike the Belgian home-schooled children.²⁷⁵ Generally speaking, administrative requirements are eased; this is so regarding the admission requirements to secondary school.²⁷⁶ Moreover, beneficiaries have access to preparatory classes (“Okan” in the Flemish-speaking region, “DASPA” in the French-speaking region) for foreign newcomers who speak a different language.²⁷⁷

The Ukrainian secondary school degree is not considered equivalent to the Belgium one. Children under 18 who have already obtained their secondary school degree in Ukraine are thus still required to enrol in a form of education (be it a regular Belgian secondary school or distance learning).²⁷⁸

If a child has special needs, the centre for student counselling can redirect them to a school more adapted to the child’s needs. The procedure for such enrolment is temporarily simplified, not requiring a medical diagnosis.²⁷⁹ The schools for special needs are mainly for children who, temporarily or permanently, require special assistance because of: (1) a physical or mental disability, (2) serious emotional or behavioural problems, and (3) severe learning disabilities. With the influx of displaced persons, these schools have extra personnel providing (para)medical, social and psychological support.²⁸⁰

There are however some obstacles for children under the age of 18. First, preparatory classes are saturated, meaning that some beneficiaries are put on waiting lists and – unless home-schooling is a possibility – do not in practice access the education system. These are the same preparatory classes that are offered to other newcomers. Moreover, if a guardian (of which there is also a shortage) has not been appointed for an unaccompanied minor, this may cause problems in practice (such as payments and school trips abroad). Foster caregivers can however make decisions about parenting in cases of urgent necessity, with notification to the parents.²⁸¹

As for those who wish to enrol in higher education, the Ukrainian secondary diploma is equivalent only to the second (out of three) cycles of secondary education in Belgium. This does in principle thus not suffice to be enrolled in higher education. So, if someone wants to continue studying with a Ukrainian secondary education degree and has already passed the age of 18, they must finish the last high school cycle through adult education. However, education institutions may deviate from this. In the absence of an equivalent secondary school diploma, an institution may enrol the person for humanitarian, medical, psychological or other social reasons. Passing a knowledge and language exam may also be set as a requirement.²⁸² Beneficiaries of temporary protection who wish to continue their studies after completing their secondary in Ukraine (and who thus don’t have the necessary requirements) must thus individually contact the institution where they want to study in order to see if they could be admitted on a discretionary basis. Some educational degrees, however, require passing mandatory exams as a prerequisite for enrolment (e.g. dentistry, medicine).²⁸³ The enrolment fee is equivalent to the standard fee that Belgian students pay (rather than the fee for third country nationals). Moreover, diploma recognition procedures, as required also for certain jobs, are free for beneficiaries.²⁸⁴

Between February 2022 and March 2025, Naric, the Flemish body which is competent to recognise degrees obtained abroad, received a total of 3,779 requests for diploma recognition; the vast majority being higher education degrees. Of those requests 2,494 (66%) degrees were recognised as equivalent.

²⁷⁵ Flanders education government page, *Ukraine crisis: lower- and secondary education*, available in Dutch at: <https://bit.ly/3kS0fQS>.

²⁷⁶ Walloon-Brussels Education unit, *Circular: Ukrainian situation, schooling for children fleeing from conflicts*, available in French at: <https://bit.ly/3jlVAX1>, 7.

²⁷⁷ Flemish Government Royal Decree, 24 May 2022, available in Dutch at: <http://bit.ly/40et3TR>.

²⁷⁸ Agency for education services, 26 February 2024.

²⁷⁹ For Flanders, see: <https://bit.ly/3kS0fQS>; for Wallonia, see: <http://bit.ly/3kVpGkC>.

²⁸⁰ Flanders education government page, *Ukraine crisis: lower- and secondary education*, available in Dutch at: <https://bit.ly/3kS0fQS>.

²⁸¹ Article 387 Quinquies Civil Code, 21 March 1804, available in French and Dutch at: <https://bit.ly/3KJp8ZN>.

²⁸² Article II.177 Codified Decree on higher education, 11 October 2013, available in Dutch at: <http://bit.ly/3JxTwWJ>.

²⁸³ Flanders education government page, *conditions of admission to higher education*, available in Dutch at: <http://bit.ly/3JuRrLa>.

²⁸⁴ Naric-Flanders, *information on the recognition of Ukrainian diploma’s*, available at: <http://bit.ly/3IHuXUW>.

This recognition is necessary for Ukrainian nationals that want to work in the public sector or want to practice a regulated profession.²⁸⁵

However, some obstacles remain regarding enrolment in higher education. The language barrier, having most courses offered in either Dutch or French, constitutes a first obstacle. Second, for people without the financial means to continue their studies through higher education, welfare centres can support the student financially throughout their education; this is conditional on meeting the commitments agreed upon with the assigned social worker.²⁸⁶ The willingness of the social welfare centre (responsible for granting financial aid to people with financial needs) to ‘invest’ in these cases varies depending on the municipality. It is highly dependent on the person’s motivation and whether the education will increase the chances of finding a job.²⁸⁷

Lastly, beneficiaries may also enrol in adult education. In relation to vocational training and above-age education beneficiaries, there is an adult education fee exemption for those who enjoy temporary protection. Beneficiaries may take Dutch (in Flanders) and French (in Wallonia) as a second language and other courses offered by the adult education centres. To do so, they must demonstrate their lawful residence in Belgium, for which they can invoke their temporary protection status. For Dutch as a second language, adults must apply first at the ‘agency for integration and social orientation’²⁸⁸ (the whole of Flanders), Atlas²⁸⁹ (Antwerp) or Amal (Ghent).²⁹⁰ They can orient non-native speakers to the most appropriate course.²⁹¹

F. Social welfare

The right to social benefits starts from the day of the demand. This means that a person with a temporary protection certificate and an inscription in the register (or proof of an appointment with the municipality) can present themselves to the social welfare centre to receive or social revenue or ‘social benefits’. The right to receive social benefits will then apply retroactively to the day of the request.²⁹² Each municipality has a ‘social welfare centre’ which operates relatively autonomously (in Flanders “OCMW”, and in Brussels and Wallonia “CPAS”). The social welfare centre of the municipality where the address is registered is responsible for granting social benefits.²⁹³ Hence, the beneficiary must be a registered resident in the specific municipality to qualify for social benefits. In December 2025, a total of 31.070 beneficiaries was receiving social benefits. This includes 13,534 beneficiaries in Flanders, 9,525 in Wallonia, and 8,011 in Brussels.²⁹⁴

The amount of financial aid given can vary greatly.²⁹⁵ This is so because under the “Equivalent Living Wage”(equivalent leefloon in Dutch) there is no fixed amount, no selected calculation method, and no fixed categories, which results in a high margin of discretion for the social welfare centres and a significant difference between the revenue granted from person to person, and from municipality to municipality. The

²⁸⁵ Naric-Flanders, *Information on the recognition of Ukrainian degrees*, available in Dutch [here](#). numbers applicable for the period February 2022 – March 2025 period.

²⁸⁶ Art. 11 § 2 (a) & art. 52, law on the right to social integration, 26 May 2022, available in Dutch and French at: <https://tinyurl.com/7szmp424>.

²⁸⁷ POD MI, *individualized project for social integration – studies*, available in Dutch and French at: <https://tinyurl.com/3d9mmr66>.

²⁸⁸ See: <https://tinyurl.com/yf22rrxt>.

²⁸⁹ See: <https://tinyurl.com/m24k73kk>.

²⁹⁰ See: <https://tinyurl.com/yp24zf3n>.

²⁹¹ Flanders education government page, *Adult education*, available in Dutch at: Flanders education government page, *Ukraine crisis: lower- and secondary education*, available in Dutch at: <https://bit.ly/3kS0fQS>.

²⁹² *Ibid.*

²⁹³ Article 2§ 5 Law on aid granted by public social welfare centres, 2 April 1965, available in French and Dutch at: <https://bit.ly/3mkSaK8>.

²⁹⁴ Note: these numbers are based on the number of total files a person has at the social welfare centre, rather than on the total number of social benefit requests. Number of persons enjoying benefits in December 2025 (so not cumulative amount). Statistics provided by the authority on social benefits POD MI. Numbers up until March 2025 available at: <https://bit.ly/3QscTTN>.

²⁹⁵ Institution on social integration (POD MI), *FAQ on Ukraine*, available in French and Dutch at: <https://bit.ly/3Rh1B3L>, 5.

social welfare centre examines the need for financial assistance and decides within 30 days.²⁹⁶ The social welfare centre determines what aid is granted based on the established factual situation (housing, forms of support received, cohabitation, etc.).²⁹⁷

Some issues emerged regarding access to social benefits.²⁹⁸ A certain lack of clarity has been reported concerning the amount of the benefits granted and/or the reasons for the refusal or reduction of the revenue. These are often communicated through an official decision only available in Flemish or French. While a centre for public support and welfare (CPSW) can make use of social translator services, it has been reported that some of the CPSW do not make use of these, further complicating communication.²⁹⁹ A lack of transparency and the extensive margin of discretion accorded to the welfare centre may result in incomprehension about the reasons for which a certain amount was or was not granted. Beneficiaries are recommended to keep the social welfare centre up to date with their situation so that their social benefits can be adapted in a timely manner to their specific situation.

In April 2026 a case was signalled to the Infoline of an CPSW rejecting the social benefits of a student with Temporary protection based on the fact that they deemed that it was not dangerous for the person to return to Ukraine, and that the person had come to Belgium with the sole motive of studying and applying for social benefits. As the CPSW is not competent to question the motive of residence, such motivation is highly problematic.

Some future measures, which have not been implemented yet will further affect the access to social benefits of beneficiaries of TP. This will include a five-year waiting period before access to benefits (*leefloon*) is possible. Financial support within those 5 years will be made coupled to integration requirements.³⁰⁰

G. Health care

Any foreigners authorised to reside in Belgium for more than three months is registered as 'resident' and consequently has the right to healthcare insurance.³⁰¹ Beneficiaries of TP are entitled to the same level of healthcare services as Belgian nationals. Persons 'visiting' in short stay are therefore required to apply for temporary protection if they wish to enjoy medical care beyond urgent medical aid.

Before resident status is granted, the right to urgent medical support is ensured regardless of whether the person has a residence permit. However, persons who have applied for temporary protection or who already have a certificate but not yet an address registration, can apply for health care insurance.³⁰²

Urgent medical health care can be provided to those who have fled Ukraine and have not yet acquired the necessary documents. This concerns potential beneficiaries who have not yet undertaken any steps for registration at the registration centre of the Immigration Office but declare that they will do so shortly, those who are on a short stay and merely have a declaration of arrival (annex 3), those who claim that they have been to the registration centre, but have not yet received the temporary protection certificate, and those who have received a certificate of temporary protection but have not yet registered themselves at their municipality.³⁰³ The cost of the medical care will, in this case, be covered by the social welfare

²⁹⁶ Response POD MI on the calculation of the *equivalent leefloon*, 12 August 2022.

²⁹⁷ See VVSG, *Right to Social benefits*, available in Dutch at: <http://bit.ly/41y2kSS>.

²⁹⁸ This is based on recurring cases that have been reported to the VVV Infoline.

²⁹⁹ Report to the Infoline, February 2024.

³⁰⁰ Belgian Federal government agreement 2025-2029, 31 January 2025, available in Dutch [here](#) and in French [here](#), 167.

³⁰¹ Article 128 Quinquies §1 Royal Decree, 3 July 1996, available in French and Dutch at: <https://bit.ly/3EOP1nj>.

³⁰² Article 5 Royal Decree 5, 12 December 1996, available in French and Dutch at <https://bit.ly/3XU7Tc4>. See also medimmigrant, '*Health care for Ukrainians*', available in French and Dutch [here](#).

³⁰³ Institution on social integration (POD MI), *FAQ on Ukraine*, available in French and Dutch at: <https://bit.ly/3Rh1B3L>, 3.

centre on the condition that they have an 'attestation of urgent medical needs' from the attending physician.³⁰⁴

Once the healthcare insurance is in order, it works retroactively, going back to the issuance of the temporary protection certificate or – where this took some more time – to the day of registration at the registration centre. Annex 15, or the A-card, allows to take out healthcare insurance. In the absence thereof, when a person only has a temporary protection certificate or proof of registration, the insurance company will check if the inscription in the Foreign nationals Register has been realised. Beneficiaries are entitled to the same health care as nationals; no distinction is made.

Despite enjoying same status as other legal residents or nationals, there may be some issues related to healthcare access.³⁰⁵ As with many other aspects, most problems arise where a person cannot register at an address. In such cases, access to healthcare is not only limited to urgent medical care, but access to actors crucial in providing healthcare information may be limited. More recently, due to the longer waiting periods for the decision after registration, an increasing group of people will likely have to make use of urgent medical aid through the social welfare centre because they cannot open a healthcare insurance yet.

³⁰⁴ *Ibid.*

³⁰⁵ Obstacles as identified by [Medimmigrant](#).