



CONFERENCE OF INGOs
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CONSEIL DE L'EUROPE

COMMITTEE ON MIGRATION ISSUES OF THE CONFERENCE OF INGOs OF THE COUNCIL OF EUROPE

*Accommodation of migrants, a major issue for the respect of
human rights.*

FIELD VISIT TO POLAND REPORT



Picture : Caritas Polska

February 10-14, 2025

Pre-words - the mission to Poland of the Committee on Migration Issues of the Conference of INGOs of the Council of Europe.

As part of its ongoing work and in line with its current mandate, the Committee on Migration Issues organized a fact-finding mission to Poland from **February 10 to 14, 2025**. The purpose of this visit was twofold:

- to examine in greater depth **the issue of accommodation and access to fundamental rights for displaced persons,**
- and to monitor **developments in migration policies in Europe through analysis in the field.**

Poland was chosen as the destination because of its **key role in receiving displaced persons**, particularly from Ukraine, but also because of the challenges encountered on the border with Belarus.

The Committee's four-member delegation met with various stakeholders:

- Local NGOs involved in receiving and supporting displaced persons,
- Representatives of national and international institutions,
- Experts and researchers specializing in migration issues.

This analysis will feed into the Committee's work and contribute to a broader reflection on migration policies in Europe.

Due to very short time allowed for formally filing this report in view of its inclusion in the agenda of the Conference's upcoming plenary session, we have not been able to submit comments attributed to NGOs for their verification. We consequently assume responsibility in case such comments would not have been accurately reflected in this report.

Caritas Polska

Caritas Poland hosted the full visit of the Committee on Migration Issues to Poland and played a key role in arranging the various meetings the Committee participated in.

As the largest charity organization in Poland, Caritas Poland works directly with beneficiaries through a wide-reaching network. The organization operates a Migrant and Refugee Assistance Center in Warsaw and oversees 27 additional such centers across the country.

Prior to 2022, Caritas Poland primarily supported migrants from various nationalities, with programs such as “Tents of Hopes.” However, in response to the war in Ukraine, Caritas Poland adapted its services. Since 2022, it has run reception facilities at the train station in Przemyśl, providing thousands of food boxes daily and sheltering around 30,000 people on Church premises. In addition, Caritas Poland has created approximately 200 places for unaccompanied minors (UAMs) and children from Ukrainian foster systems.

Caritas Poland also collaborates with Polish border guards, particularly at the Belarus border, and engages with state authorities in broader efforts. Notably, Caritas has access to detention centers, including the so-called “closed centers,” where they provide vital support and services

to those detained.

ACKNOWLEDGEMENTS

The Committee on Migration Issues of the Conference of INGOs of the Council of Europe extends its heartfelt thanks to all those met during this field trip to Poland, in the locations of Warsaw, Czeremsze, Białystok, and Przemyśl.

In particular, the Committee expresses its sincere gratitude to **Caritas Polska**, the main supporting organization, for their invaluable assistance in ensuring the success of the mission. Their support played a crucial role in facilitating the smooth execution of the trip, meeting all of the Committee's expectations.

The Committee also wishes to thank the **16 civil society organizations** that participated in the meetings: Alight Foundation Europe, Caritas Białystok, Caritas Rzeszów, Caritas Warsaw, Centrum Pomocy Międzynarodowej, Dialog Foundation, Egala Association, Fundacja Ocaleni, ELEOS Orthodox Metropolitan Mercy Center, Fundacja Polskie, Habitat for Humanity, Klub Inteligencji Katolickiej, Konsorcjum Migracyjne, Migrant and Refugee Assistance Centre, PSAR, Ruch Focolari, Save the Children Poland, The Association of Ukrainians in Podlasie, the Association of Ukrainians in Poland (Przemyśl branch), the Polish Red Cross and Voivodship. Their valuable input and collaboration were essential to the success of the mission.

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Furthermore, the Committee extends its gratitude to the representatives of **UNHCR** for their helpful perspectives and for contributing to the delegation's reflections and discussions.

Finally, the Committee extends its thanks to the **Belgian Embassy** in Warsaw for their warm welcome and support throughout the mission, as well as to the representatives of the **Embassies of France, Sweden, Norway, Luxembourg, the Netherlands, Greece, and Germany** for their fruitful exchanges and contribution.

Christine Monty - Committee Chairman.
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INTRODUCTION - THE POLITICAL CONTEXT IN POLAND

In Poland, migration presents two distinct realities¹. On one hand, at the Polish-Belarus border, migration management has been characterized by strict border controls and a heightened focus on security. On the other hand, the situation at the Polish-Ukrainian border painted a very different picture, where migration management has been largely shaped by the efforts of NGOs, activists, and individuals. While the Polish government has made substantial efforts to organize and manage the flow of displaced persons from Ukraine, the responsibility for much of the humanitarian work has fallen on the shoulders of civil society, which has stepped in to fill the gaps left by the state's limited involvement. These contrasting approaches highlight the complexity and challenges of managing migration in Poland.

The political landscape regarding migration in Poland has been marked by significant developments and tensions in 2024. Since June, the Polish government has taken a more stringent approach to border control with Belarus, driven by escalating migration pressures. On June 10, 2024, Poland reintroduced a 60-kilometer exclusion zone along its border with Belarus, effectively restricting access for humanitarian organizations.² Originally set to last 90 days, this measure was extended in September,³ intensifying concerns over the humanitarian impact of the border policy. The Council of Europe's Commissioner for Human Rights, Michael O'Flaherty, expressed deep concerns over summary expulsions and the ongoing restrictions on humanitarian access in the buffer zone, emphasizing that such practices cannot be justified under international human rights law.⁴

In August, the Polish Parliament “approved a new measure which authorizes agents on the Belarus border to fire live ammunition at migrants, for ‘self-defense’ or in a ‘preventive manner’.”⁵ The law, which has drawn sharp criticism from international organizations and NGOs, raises serious concerns about its potential violations of fundamental human rights.

In addition to these border control measures, Poland's migration strategy underwent a major shift in October 2024.⁶ The new strategy included the temporary suspension of asylum rights and a firm rejection of the European Union's Migration and Asylum Pact. The government has made it clear that it will oppose any European measures that it perceives as undermining Poland's security interests. Meanwhile, the temporary protection status for Ukrainian nationals, along with some of their family members, was extended until September 2025, while other beneficiaries of temporary protection have until March 2025.

¹ Meeting of the Committee on Migration Issues of the Conference of INGOs of the Council of Europe with Hannah Machinska, Head of the Research Centre of the Acquis of the Council of Europe - 11.02.2025

² Claudia Ciobanu. 2024. Poland reintroduces border exclusion zone with Belarus, citing migrant surge. Available [here](#).

³ Reuters. 2024. Poland to extend no-go zone on Belarus border for 90 days. Available [here](#).

⁴ Commissioner for Human Rights of the Council of Europe. 2024. Poland needs to respect its international human rights obligations on the Belarusian border, says Commissioner O'Flaherty. Available [here](#).

⁵ Marlène Parana. 2024. Poland allows police to open fire on migrants at the Belarusian border. Available [here](#).

⁶ Polish Government. 2024. Resolution on the adoption of the document ‘Regaining control. Ensuring security. A comprehensive and responsible migration strategy for Poland 2025-2030’. Available [here](#).

This field study trip to Poland was designed to explore the impact of the country's evolving migration policies on asylum seekers and refugees. The visit also aimed to assess the role of civil society organizations and international actors in responding to the challenges posed by these policies. While the Committee on Migration Issues arrived with prior knowledge of the situation, the discussions and meetings held throughout the trip unveiled new, previously unknown issues. Conversations with various institutional and political stakeholders provided valuable insights into the complex landscape of migration, shedding light on the contrasting perspectives of national authorities and civil society organizations.

This report outlines the key challenges and issues identified during the meetings held throughout the field study trip to Poland, focusing on both the border regions with **Belarus (I)** and **Ukraine (II)**. It explores the critical challenges related to migration management, particularly in terms of **accommodation (III)**, which remains a central concern for the Committee on Migration Issues. The report will conclude with a set of **observations (IV)**, derived from the Committee's observations and discussions during the visit, aimed at addressing the key issues encountered.

I. MIGRATION ISSUES AND CHALLENGES AT THE POLISH-BELARUS BORDER

Poland's approach to migration, particularly at the Belarus border, has raised concerns in its response to Putin's strategy of instrumentalizing migration. It appeared during the Committee's visit, that the situation is highly dependent on diplomatic relations between Minsk and Western Europe, with Poland's actions fluctuating accordingly. Poland is increasingly perceived negatively due to its handling of the Belarus border situation, leading to question why the country would risk damaging its reputation, especially when it has been seen as more successful in managing the influx of Ukrainian refugees. This shift in perception highlights a growing tension where security concerns appear to be taking precedence over human rights considerations in Poland's migration policy.

According to data shared by representatives of Polish Border Guards, Poland shares 247 km with Belarus (with 13 Border Guards Stations), and 104 km with Lithuania (with 3 Border Guards Stations).⁷ The main nationalities trying to cross the border with Belarus since 2021 are people from: Iraq, Afghanistan Syria, Somalia, Turkey, Iran, Sudan, Ethiopia, Eritrea, Yemen. Recorded applications for International Protection were 547 in 2023, and 2,685 in 2024. 80% of those applications are reported discontinued because the person might not be on Polish territory anymore.⁸ 26 000 attempts were recorded in 2023 and 29,709 in 2024.⁹

During its mission to Poland, the Committee noticed an obvious ambivalence of treatment between Ukrainian refugees and those of other nationalities crossing the Belarus border. The **ELEOS Orthodox Metropolitan Mercy Center** reported during a meeting that, since the conflict with Ukraine began, the Polish government has emphasized the country's support for Ukrainian refugees while simultaneously focusing on "illegal" migration, particularly from Belarus. This has led to growing fear within society about displaced individuals.

1) Border guards

During this mission the Committee on Migration Issues was provided with an overview of the relationship between the Polish Border Guards and other key stakeholders involved in migration management within the country. On one hand, the Committee engaged with organizations and stakeholders that maintain relatively cooperative relationships with the Polish Border Guards. For instance, the UNHCR and IOM have established a Memorandum of Understanding (MoU) with the Border Guards, while Caritas Poland also collaborates with them.

On the other hand, every civil society organization working on the situation at the border with Belarus the Committee met, expressed significant challenges in communication and cooperation

⁷ Meeting of the Committee on Migration Issues of the Conference of INGOs of the Council of Europe with representatives of Border Guards at the border crossing point of Czeremsze on 12.02.2025.

⁸ Ibid.

⁹ Ibid. Similar numbers can be found [here](#).

with the Border Guards and acknowledged the complexities and difficulties that arise in navigating these interactions.

There is no doubt that certain acts of violence are being committed against Border Guards by migrants arriving at the border and realising that crossing towards Poland is virtually impossible. Fatigue, long periods of suffering, human loss, frustration obviously belong to the explanations. Civil society testimonies do however seem to indicate that the violence used against displaced persons trying to cross the border is often disproportionate.

2) Lack of clear rules of engagement

Being detected as a migrant by Border Guards while crossing the forest and swamps which constitute the border between Belarus and Poland, is often described as ‘a lottery’. In certain cases, Border Guards reserve a mild and humane treatment, in other cases reaction is abusive and unnecessarily violent. From this observation of arbitrary handling of cases one is inclined to deduce that there is a lack of clear Rules of Engagement for the Border Guards and other authorities of enforcement. This also implies that there are no proper and generally recognized benchmarks for monitoring and evaluation of ways of conduct on the side of enforcement officers and that probably too much concrete decision-making is left to the discretion of enforcement personnel which has not been properly prepared for the task and cannot rely on clear codes of conduct.

3) Suspension of application for international protection

Civil society organizations met in Poland reported concerns about the possibility of suspending asylum rights under a new bill, which would allow the Prime Minister to declare a region under “instrumentalization” by the Belarus regime, effectively barring people from applying for international protection for 60 days. As Human Rights Watch also explains it, “extensions beyond this period could be authorized with parliamentary approval and renewed indefinitely.”¹⁰

The Committee was also informed of concerns regarding the lack of agreement on the solidarity mechanism in the new migration pact, with Poland arguing that its substantial number of Ukrainian refugees should exempt it from participation. Additionally, civil society organizations are worried the government might be considering the externalization of migration, including possible future bilateral agreements with Belarus.

In this context, the Committee on Migration Issues observed the political complexity within which civil society organizations operate as they strive to address the migration challenges at the Belarus border.

- The **Ocalenie Foundation** has been active at the Belarus border since 2021, where they’ve witnessed the suspension of application processing for refugees, a practice that has been

¹⁰ Human Rights Watch. 2025. Poland: Scrap Bill Suspending Right To Asylum European Commission Should Take Legal Action If Adopted. Available [here](#).

ongoing since 2021 and is now being made official. Border guards are not accepting applications from asylum seekers, which significantly hampers their ability to seek asylum.

- The **Egala Association**¹¹ highlights the severe issue of pushbacks at the Polish-Belarus border, where border guards routinely refuse to identify individuals and forcibly deport them back to Belarus. Along with significant violations from both Belarus and Polish border guards, numerous testimonies and reports have emerged, documenting the grim reality.¹²

When people attempt to seek asylum, they are often told they are refusing international protection. In some cases, refugees are coerced into signing documents claiming that their final destination is another European country, not Poland. Border guards and police are often reported to display racist attitudes toward migrants.

4) Articulation Government - Civil society organisations

a/ Criminalisation of humanitarian workers

During its visit to Poland, the Committee on Migration Issues observed a clear divergence of opinions regarding civil society workers. Institutional stakeholders raised concerns about potential legal violations by humanitarian workers at the Belarus border, particularly regarding the facilitation of irregular entry and movement within Polish territory. In contrast, civil society organizations and scholars strongly criticized what they perceived as a criminalization of their efforts in this context.

UN human rights experts had already called on Poland in 2022 to investigate allegations of harassment against human rights defenders, including journalists and interpreters, at the Belarus border. They urged Poland to grant these workers unhindered access to the border area to ensure they can carry out their vital work safely and freely, highlighting concerns over reports of intimidation and threats against those documenting human rights violations.¹³

These remarks also echoed the ongoing trial against five activists in Poland facing prison sentences after providing humanitarian aid at the border with Belarus.¹⁴

b/ Security dimension of migration management in Poland and individual dignity

During the field visit to Poland, all stakeholders emphasized that the country's approach to migration management at the Belarus border is heavily influenced by a security-driven

¹¹ Egala works on the ground, including in the forests, where they witness firsthand the refusal of asylum even in Polish territory.

¹² For examples of testimonies see: Human Rights Watch. 2024. Poland: Brutal Pushbacks at Belarus Border Border Guards Use Force, Deny Access to Asylum Procedures. Available [here](#).

¹³ OHCHR. 2022. Poland: Human rights defenders face threats and intimidation at Belarus border – UN experts. Available [here](#).

¹⁴ Biran Dooley. 2025. Five Activists face trial in Poland after helping migrants. Available [here](#) ; Magdalena Chrzczonowicz. 2025. Trial of five in Hajnówka. They face prison for helping. “We should not be afraid of people in need”. Available [here](#).

perspective. This is obviously due to the fact that migration is being systematically instrumentalized by Russia and Belarus in order to put pressure on the borders of the European Union. According to information obtained, migrants are reported to be actively recruited in their home countries, mainly in Africa, the Middle East and Central Asia, offered entry visa into Russia and/or Belarus and eventually transferred from Moscow or Minsk to the border with either Poland or Finland, mainly. This procedure varies according to the political needs and considerations in Moscow and Minsk. Once these persons reach the border with Poland, without however being able to cross, they are not allowed back into Belarus, which creates major humanitarian problems of hunger, disease, and misery.

In meetings with Border Guard representatives at the Belarus border, terms such as “border protection,” “preventing irregular crossings,” and “useful buffer zone” were frequently used, clearly signalling the security-focused nature of discourse. UNHCR representatives also reiterated its opposition to externalization, advocating instead for robust border procedures. Hanna Machinska, Head of the Research Centre of the Acquis of the Council of Europe, described¹⁵ pushbacks as the “primary tool” in Poland's migration management, noting that the government’s strategy is framed in military and security terms, often running counter to the Geneva Convention and international human rights frameworks.

Given the instrumentalization of migration by Russia and Belarus, there is an undeniable security dimension to the issue of border management for Poland. However, treatment of individual migrants who have fallen into the Russian and Belarus trap and find themselves in a deadlock situation at the Polish border, cannot be humanely dictated by collective measures and should still be determined on the basis of individual risk assessment. Otherwise, fundamental human dignity is at risk of being compromised, leading to violence and dehumanization.

In this particular context, the Committee delegation was struck by the existence at the border post of Czeremsze of a quite complete infrastructure of ‘shelter’ for migrants. Human rights advisory staff was also present at Czeremsze border post. However, none of the above had been in use for several weeks or months. This is obviously due to the fact that there were hardly any irregular border crossings over the last weeks, partly due to adverse winter conditions, the efficiency of Polish border monitoring and the “buffer zone” and possibly also a temporary shift of direction into which Russia and Belarus send migrants.

There seems indeed to be a certain level of formal compliance at the border regarding reception conditions, but its concrete significance can only be judged from the effective use which is made of the existing infrastructures.

- The **KIK** emphasized to the Committee that the majority of the responsibility for supporting displaced persons and organizing the support system falls on NGOs, while the Polish government’s response remains relatively moderate despite the increasing need. The government’s approach, particularly in relation to the Belarus route, sends a clear message

¹⁵ Meeting of the Committee on Migration Issues of the Conference of INGOs of the Council of Europe with Hannah Machinska, Head of the Research Centre of the Acquis of the Council of Europe - 11.02.2025

that refugees are not welcome, driven by political motives focused on self-protection. Cooperation with smaller NGOs, such as Grupa Graniza, has been essential, but there is limited support from larger organizations. The current administration's political stance has hindered the delivery of human rights and adherence to international agreements, further complicating the situation.

- The **ELEOS Orthodox Metropolitan Mercy Center** explained to the Committee that, officially, only a small number of displaced individuals are welcomed in parishes, though unofficially, many more receive assistance. However, media repression creates a narrative that these efforts are in collaboration with external agencies, creating further stigma. Parishes are legally required to inform authorities when they host displaced persons but do so only when a lawyer or legal representative is present to safeguard the rights of those seeking refuge. Disturbingly, some individuals are placed in handcuffs, even when leaving hospitals.

c) Local and national authorities

As highlighted by civil society organizations, the ongoing legislative changes in Poland have led to local authorities working closely with NGOs, largely due to a lack of transparency and clear guidance from higher levels of governance. While this collaboration has had a positive impact, there is a concern about overreliance on NGOs to fill gaps in the system. Local authorities, often positioned at the end of the decision-making chain, continue to face challenges as Poland still lacks a comprehensive, multi-sector migration policy. However, there is promising interest from local governments in organizing themselves around these issues, and local initiatives tend to be the most efficient and well-organized in addressing migration challenges. The business sector also plays a crucial role in this equation, being a reliable partner in the Polish labour market, highlighting the importance of cooperation between different sectors to support migration management efforts effectively.

While efforts to create cooperation mechanisms between NGOs and local governments are underway, local entities are increasingly interested in developing international mechanisms to address these issues. **KIK** is working on broader cooperative initiatives to fill gaps and enhance integration efforts, such as the sponsorship framework. However, the need to overcome distances, prejudices, and discrimination remains critical. In most European countries, sponsorship programs are government-driven, but in Poland, the reverse is true, making the focus more on helping, welcoming, and integrating refugees. Accommodation remains one of the biggest challenges, not only for refugees but also for the Polish population itself.

II. MIGRATION ISSUES AND CHALLENGES AT THE POLISH-UKRAINIAN BORDER

What was particularly noticeable during the field visit of the Committee on Migration Issues to Poland was the general positive picture towards welcoming and managing refugees from Ukraine coming to Poland and the contrast with asylum seekers coming through the Belarus border.

1) Spontaneous humanitarian assistance

The Committee on Migration Issues noted the immediate and spontaneous response in providing humanitarian assistance to Ukrainian refugees following the onset of the war in February 2022. This quick mobilization was driven by both local communities and civil society organizations, which rapidly organized to offer essential support such as food, shelter, and medical aid. The response demonstrated a high level of solidarity, with Polish citizens and organizations stepping in to fill the gaps left by government structures in the early stages of the war. Despite the scale of the effort, however, the Committee also observed challenges in maintaining the continuity and effectiveness of these support mechanisms as the situation evolved.

Many of the organisations met in Poland during the mission focused on Ukrainian refugees without limiting their actions to only Ukrainian nationals. In other words, many of those organisations were also opening their services to other nationalities. Still Ukrainian refugees count for most¹⁶ of their beneficiaries.

- **Caritas Rzeszów**, through its Migrant and Refugee Assistance Centre, has been providing crucial support to refugees, though their work is increasingly constrained as funds continue to shrink. While they are grateful for their cooperation with UNHCR, the number of NGOs working together in this area is dwindling, and many were unprepared for the scale of the challenges they faced. Since the beginning of the war, Caritas¹⁷ has been welcoming up to 300 refugees per day, providing food, clothing, and psychological support.
- As explained by **Caritas Poland**, Ukrainian refugees are not accommodated in camps but in collective accommodation centres, church premises, schools and other buildings capable of accommodating groups. Ukrainian refugees are included in Polish social and school systems, with 800€ state support per child for Ukrainian families.

¹⁶ Sometimes up to 75 to 90% according to the civil society organizations met by the Committee.

¹⁷ A key focus has been on delivering psychological aid to Ukrainian refugees, with services provided by Ukrainian-speaking psychologists. Caritas also offers language courses, support with professional inclusion, and places for children in kindergartens, as well as facilitating Ukrainian language classes for Ukrainian refugees to better integrate into Polish society.

2) Humanitarian fatigue

Among the new insights gained during this visit to Poland was the emergence of humanitarian fatigue within Polish society. After successfully managing the influx of nearly 8 million Ukrainians who passed through or arrived in the country,¹⁸ with approximately 1 million still residing there,¹⁹ the Polish population has begun to feel the strain of ongoing support efforts. While the initial response was marked by widespread solidarity and volunteerism, the prolonged nature of the crisis has led to growing exhaustion among both civil society organizations and local communities. This shift is increasingly reflected in public sentiment, which, while still supportive, now grapples with the challenges of sustaining assistance and integration efforts in the face of mounting pressures.

Civil society organisations explained that many refugees who returned to Ukraine in Autumn 2022 are now back in Poland in 2024, and new groups of people are fleeing from different regions. However, financial restrictions from the United States have created significant gaps in the aid available to these individuals. Shelters, particularly group shelters, offer limited stays of only 120 days, and refugees cannot access these services again if they leave for Ukraine and return.

- As highlighted by the **KIK** organisation, the capacity of Polish civil society is nearing its limits, already feeling the strain and exhaustion from the growing demands. Polish citizens now start showing reduced will to support refugees, further complicating their situation.
- The **Migration Consortium** highlighted a troubling shift in public opinion and support for refugees in Poland, with a growing sense of compassion and humanitarian fatigue. Only 30% of the Polish population believes Ukrainian refugees should be helped, and support for non-Ukrainian refugees is even lower. There is a significant lack of private accommodation for refugees, with most of the support relying on civil society organizations.

3) Shift from emergency response to integration policies

As the situation has evolved since 2022, the humanitarian response to the influx of Ukrainian refugees to Poland has also transformed. Initially focused on providing urgent, emergency aid to those fleeing the war, the response has gradually shifted towards long-term integration efforts. Today, the primary focus is on helping refugees adapt to life in Poland through language courses, employment support, housing assistance, and educational opportunities for children. While emergency assistance remains available for those in immediate need, the emphasis is now on ensuring sustainable integration, addressing both the social and economic challenges faced by refugees as they begin to establish themselves in their new communities.

¹⁸ Statista. 2025. Number of people who crossed the Polish border from the war-stricken Ukraine from January 2022 to December 2024, by date of report. Available [here](#).

¹⁹ Eurostat. 2025. Temporary protection for persons fleeing Ukraine - monthly statistics. Available [here](#).

The Committee on Migration Issues was surprised to hear during its visits reports of **discrimination** and difficulties faced by Ukrainian refugees in Poland, particularly regarding integration. This resistance is compounded by the growing challenges faced by other displaced persons, such as Roma or African refugees from Ukraine, who face even greater difficulties. Initially, in 2022, anti-Ukrainian sentiment was virtually absent in public discourse, with only small minorities expressing opposition. However, this has changed over time, and anti-Ukrainian rhetoric has increasingly found its place within the political spectrum, fuelling speculations. Despite the increase in foreign workers, civil society organisations the Committee met felt the Polish government has not adequately prepared its citizens for this shift, and the prevailing rhetoric is not welcoming. Hence also the call on Polish society's side that integration should be assimilation, leaving no margin for differentiation in ways of life, habits, etc.

Many Poles and Polish authorities included, do not differentiate between integration and assimilation, viewing integration as a one-way process. This complicates the situation for Ukrainian refugees who are tossed around between the idea of integrating and making a living in Poland and the idea of keeping the perspective intact to return home to Ukraine one day. Simultaneously, Ukrainian refugees in Poland undergo the pressure of their government in Kiev, which aims at the return home of its people in Poland, either soon or after the end of hostilities. As an example of the latter, the Ukrainian government has imposed restrictions, particularly on young men who are supposed to join the military, limiting their access to support services from Ukrainian embassies. Though there was an initial expectation that many men would return to Ukraine to arrange their documents, this did not happen. Ukrainian authorities have since reversed their stance, now offering counselling services to men but acknowledging the issue. As many refugees still consider returning to Ukraine once peace is established, Ukrainian authorities have adjusted their approach to avoid integration in Poland.

In conclusion, while the situation for Ukrainian refugees is still better than that of those attempting to cross the Belarus border, the challenges remain significant.

4) Running out of finance ²⁰

During the field study trip to Poland, it became evident that civil society organizations are deeply concerned about a significant decrease in their funding, which could severely impact their ability to carry out their vital work. The unexpected duration of the war, the freezing of US aid, combined with cuts in assets, has compounded these financial challenges, leading to a sense of uncertainty about the future, even the short-term future. Many organizations expressed fears that these funding shortages will hinder their capacity to provide essential services to refugees and migrants, and to continue their advocacy work at a time when support is more crucial than ever. The potential global consequences of these funding cuts could be devastating, not only for the organizations themselves but also for the people they serve.

²⁰ NB. This doesn't only affect organizations working with Ukrainian refugees.

- **Caritas Rzeszów** explained how some organizations have already exhausted their funds, particularly those dependent on US foundations.
- The **Migration Consortium** explained how funding cuts and the freezing of US funds have disproportionately affected housing programs, which are the first to be reduced. As refugees leave the camps, they continue to face many of the same challenges, highlighting the double standards in the system.

III. ACCOMMODATION OF REFUGEES AND ASYLUM SEEKERS IN POLAND - ISSUES AND CHALLENGES

“If I don’t know where I will go to sleep, I don’t know where to begin”

Meeting with civil society organizations - Warsaw 11.02.2025

The Committee on Migration Issues was explained by civil society organizations how Poland’s national migration strategy, overseen by the Ministry of the Interior, covers nine key areas, but notably, accommodation is not one of them. Despite NGOs’ efforts to raise awareness, this crucial issue has been overlooked. The introduction of a participatory fee for collective accommodation centres over a year ago has been problematic, particularly for vulnerable groups, with the government aiming to reduce the number of people in these centres. As these centres close, the most vulnerable refugees are left to find housing, often resulting in “voluntary” returns to Ukraine, even though conditions there remain dire. Private host agreements also raise concerns, as they often give landlords the right to evict refugees easily.

The issue of homelessness remains a significant problem, with no reliable monitoring or research on the scale of foreign homelessness, leaving a major gap in understanding and addressing the needs of refugees.

- According to the **Ocalenie Foundation**,²¹ one of the major issues regarding migration is homelessness, with no reliable data on the extent of this problem. Once refugees are granted status, they often lose access to aid, which can lead to homelessness.
- The **Egala Association** also provides temporary accommodation in Białystok, but only a few organizations are equipped to offer housing.
- The **Migration Consortium** also warns on human trafficking cases, with networks focusing on small, remote areas that NGOs often cannot reach, where there is little to no monitoring, and the situation is deteriorating for both Ukrainian and non-Ukrainian vulnerable populations.

1) spontaneous accommodation of Ukrainian nationals

Not only the local population and families who have opened their homes to accommodate Ukrainian nationals, but also municipalities, have played a crucial role in supporting the influx of refugees. Municipalities have taken on significant responsibilities, ranging from providing temporary housing and essential services like food, healthcare, and education, to facilitating integration programs and employment opportunities. In many cases, local governments have had to quickly adapt to the growing needs of refugees, often without sufficient support or clear

²¹ The foundation operates two key programs to assist with housing and integration. The “Welcome Home” program supports families with housing challenges, as renting in the free market is difficult due to strict landlords and a lack of regulations. This program also helps with everyday struggles, including medical care. Additionally, the integration program offers support to refugees, with financial assistance, Polish language courses, and an assistant for one year.

guidance from national authorities. This has put considerable pressure on municipal resources, but also highlighted the solidarity and resilience of local communities in managing the challenges posed by the large-scale arrival of Ukrainian nationals.

- **Save the Children Poland** highlighted to the Committee on Migration Issues how economically supporting families was proven successful in that it resulted in decreasing the financial burden, and that 75% of their beneficiaries then reported feeling safe and an improved wellness. This wellness feeling also came together with moving from collective places to single apartments.
- Before 2022, **Habitat for Humanity's** activities primarily focused on advocacy and smaller-scale social and mental health programs. However, since 2022, the organization has shifted its focus to supporting Ukrainian refugees. Recognizing the importance of housing in crisis response, Habitat for Humanity has worked to bridge gaps and engage with government efforts. The organization has provided short-term accommodation to over 8,000 individuals and mid- to long-term housing to more than 2,500 refugees. Initially offering emergency support, such as a reception kiosk at the Warsaw train station and temporary accommodations in shelters and hostels, Habitat for Humanity has since expanded its efforts with a medium-term response, including a social rental program and holistic support to refugee facilities. The organization also collaborates with local communities through social mental agencies to provide comprehensive care.

Despite their efforts, Habitat for Humanity faces several challenges in their response to the refugee crisis. One major issue reported was the **lack of a national shelter strategy**, which hinders coordinated and efficient support for those in need. Delays in decision-making and funding allocation further complicate the situation, leaving many refugees without timely assistance. The absence of comprehensive data also makes it difficult to assess the full scale of the crisis and target interventions effectively. Additionally, the shortage of affordable housing and rising rent prices exacerbate the difficulties refugees face in securing long-term accommodation. The legal frameworks for social rental housing remain insufficient, limiting the available options for refugees. Furthermore, the growing fatigue among donors, especially this year, raises concerns about the sustainability of ongoing support for both short- and long-term solutions.

2) Accommodation of unaccompanied minors (UAMs) in Poland

It is worth mentioning, as highlighted by civil society organizations, that the numbers of UAMs from Ukraine are way inferior to the number of accompanied children with families. Regarding children and more especially unaccompanied minors the situation was reported more complex as there is a political dimension added to the situation. According to the organization **Save the children Poland**, many children were evacuated from the institutional alternative in Ukraine, meaning they are neither separated nor unaccompanied.

- Ukrainian children in Poland face significant challenges, according to **Save the Children Poland**. These children remain under Ukrainian jurisdiction, meaning they cannot be

adopted in Poland or placed in family-based care, limiting their opportunities for long-term stability. The Polish social assistance system struggles to provide sufficient safeguarding measures, and local organizations often lack access to Ukrainian-run care facilities, making it difficult to offer oversight and support. Despite this, Save the Children has managed to reach many children, offering case management and psycho-social support.

The needs of these children are diverse, with varying vulnerabilities depending on their backgrounds. Many are placed in remote areas, where they have limited access to education or a dual school system. The care they receive is largely institutionalized, with frequent changes in caregivers, further destabilizing their situation. Unfortunately, there is no systemic support for caregivers in Poland, making it even harder for children to receive the consistent care they need.

- In 2024, UAMs in Poland faced alarming challenges, particularly the risk of pushbacks at the border with Belarus. **Save the Children Poland** reports 464 requests for humanitarian aid from children, both with families and alone. Among these, 117 cases involved children being forcibly pushed back to Belarus, highlighting the severe risks and vulnerabilities these minors face as they seek safety and protection.

The Committee on Migration Issues also met with representatives from the Ministry of Family, Labour, and Social Policy, who outlined Poland's strategy for the mass accommodation of Ukrainian UAMs in the country. Still, according to the Ministry representatives, efforts have been made to transfer some of the UAMs from those mass accommodations to smaller units, recognising that in those large units, sometimes accommodating up to 500 UAMs, there can be no holistic approach to their needs.

However, when this strategy was discussed with civil society organisations, as well as representatives from the UNHCR and various embassies, it became apparent that some were unaware of those mass accommodation units. This lack of awareness raised concerns about communication gaps between government authorities and key stakeholders involved in migration and refugee assistance. The discrepancy between the official policy and the understanding of civil society and international partners points to potential challenges in ensuring effective implementation and coordination of support for vulnerable groups such as UAMs.

3) Open and Closed Centres for asylum seekers in Poland

Non-Ukrainian nationals are accommodated both in open and closed centres. Those camps present several challenges, forcing civil society organisations to fill the gaps.

As disclosed by civil society organisations, especially the **foundation for migrants “Good Start”**, the procedure for non-Ukrainian refugees in Poland is often long and uncertain. Most individuals cross from Belarus and are initially taken to detention camps (so-called closed camps), where they can remain for five to seven months. After this period, some are moved to open camps, but in these camps, there is little to do except wait, with activities primarily provided by NGOs. Once a decision is made on their status, those who receive a positive response are given up to two

months to stay in the open camp, leaving them with the challenge of figuring out their next steps. One option is the national program providing financial assistance, but the application process takes height to nine months, further prolonging their uncertainty and dependence.

- The **Kuchnia Konfliktu Foundation** focuses on supporting marginalized populations, particularly young men aged 18-40, who are often overlooked by other organizations that prioritize vulnerable groups. The foundation's Safe House project specifically targets these young men, offering them a temporary refuge. Many open camps in Poland are located far from cities, making it nearly impossible for residents to find employment or build a new life. Public transportation is limited, especially after 6 pm, further restricting access to job opportunities. Two types of individuals are served: those still in the process of seeking asylum, who often find themselves with nothing to do in the camps, and those who have received a decision but can only stay for an additional two months. The challenges extend to the Polish rental market, where racist attitudes persist, such as landlords hanging up on potential tenants with foreign accents, and strict criteria limit access to municipal housing. Additionally, there is a growing anti-Russian and anti-Belarus sentiment.
- According to the **Egala Association**, the Polish government has failed to provide meaningful support to refugees, leaving them without access to legal procedures, food, water, or medical care. In response, Egala provides interpretation services in hospitals, sends workers into forests with supplies, and offers free legal support through casework. When international protection applications are accepted, border guards arbitrarily decide whether to send people to open or closed detention centres. Refugees are given 48 hours to reach reception centres, which are often located far from major cities like Warsaw, making access nearly impossible from closed centres.

It is, therefore, the Committee on Migration Issues' understanding that the management of asylum seekers in Poland, particularly at the border with Belarus, is often arbitrary and inconsistent. Displaced individuals can face pushbacks, where their fundamental right to seek asylum is denied. In cases where their right to asylum is recognized, they are frequently detained and taken to closed camps, where their identities are subjected to prolonged checks. This practice raises significant concerns about the protection of asylum seekers' rights, as it limits their access to fair procedures and places them in detention under conditions that can be detrimental to their well-being. Such actions seem to contradict Poland's international obligations under the Geneva Convention and the European Union's common asylum framework.

IV. CONCLUSIONS

Drawing on the field expertise of the organizations met, and the information gathered during this study visit, the Committee on Migration Issues has developed the following conclusions:

1. **Respect for International Law and the Fundamental Rights of Displaced Persons:** Polish authorities, particularly border guards, must fully comply with international standards in managing migration flows. Specifically:
 - a. Poland must **end the practice of pushbacks at the border**, which constitutes a clear violation of the **1951 Geneva Convention**. It is crucial that any individual seeking asylum be allowed to exercise their right without obstruction, in line with Poland's international commitments.
 - b. It is essential that Poland **respects and protects the fundamental rights of displaced persons**, regardless of their origin, ethnicity, religion, or any other discriminatory attribute. This includes access to fair asylum procedures and protection from inhuman or degrading treatment. The unquestionable security dimension of the migration issue at the Belarus border is not a valid reason for denying individual migrants access to their fundamental rights.
2. **Non-Criminalization of Humanitarian Workers:** Polish authorities must **cease the criminalization of humanitarian workers** operating at the Polish-Belarus border. These individuals play a vital role in providing emergency aid and advocating for the rights of migrants, refugees, and asylum seekers. Any form of repression against journalists, interpreters, or NGO members must be stopped. Poland should ensure a safe and supportive environment for their humanitarian work, protecting their rights and granting them full access to border areas -especially the buffer zone- without interference or intimidation.
3. **Improved Access to Humanitarian Aid:** Polish authorities should ensure **unrestricted access to humanitarian organizations** and actors working at the borders. These organizations are crucial in providing essential aid, including shelter, medical support, legal assistance, and psychological care. By facilitating smoother coordination with NGOs, the government would not only ensure that human rights are upheld but also enhance the overall humanitarian response to the refugee crisis.
4. **Anti-Discrimination Policies for Ukrainian Refugees:** Although Poland has welcomed a significant number of Ukrainian refugees since 2022, **specific anti-discrimination policies** must be implemented to prevent xenophobia, stigmatization, or marginalization of these refugees. It is necessary to promote an inclusive approach that values cultural diversity and ensures equal treatment for all refugees, whether they are Ukrainian or from other nationalities. This includes awareness programs, better human rights training for local authorities, and coordination with civil society organizations to create a climate of acceptance and integration.

5. Strategies for Housing:

- a. Poland should **avoid**, wherever possible, **systematic long-term detention** of asylum seekers whose identity has yet to be verified.
- b. Poland must develop and implement **appropriate strategies for housing UAMs**, particularly those arriving at the border with Belarus or from other regions. These minors are particularly vulnerable and require a safe and suitable environment for their reception. It is essential to provide quality housing solutions that guarantee their safety, access to education, adequate healthcare, and a gradual integration into Polish society. Partnerships with local and international organizations should be encouraged to meet the specific needs of this vulnerable group.