

1 April 2026

REPORT on the mission to POLAND

4 – 5 February 2026

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Introduction

The Division on Migration and Refugees (DMR) was established in the Directorate General of Human Rights and the Rule of Law (DGI) on 1 February 2025. One of the DMR's key activities is to carry out country missions to member States to collect and analyse information on migration law and policies, and to propose to the member States specific tailored assistance in this field.

On 4 and 5 February 2026 a DMR delegation consisting of Mr Nikolaos Sitaropoulos, Head of the DMR and Ms Karolina Kirincic-Andritsou, Legal Advisor, carried out a visit to Poland which focused on the reception and integration of Ukrainian war-displaced persons in the country, currently approximately one million, making Poland the country hosting the second largest number of Ukrainians with temporary protection.¹ The mission also tackled issues concerning the identification and protection of particularly vulnerable migrants and asylum seekers, and the migration pressure at the eastern border.

The country visit provided the DMR delegation with the opportunity to collect and analyse information and exchange views with a number of national and international stakeholders on the developed and planned measures regarding the above-mentioned issues. Discussions also addressed legislative changes under way providing for the transition of Ukrainian displaced persons from temporary protection to long-term immigration statuses and measures to enhance integration of migrants, in line with Poland's Migration Strategy 2025-2030.

1. Meetings and site visit

The visit included meetings with officials from the Ministry of Interior and Administration (Department of International Relations and Migration, Analysis and Statistics Division at the Office for Foreigners, the Strategic Projects Division of the Department of Public Administration), including several high-level Border Guard officials, the Ministry of Education (Department of International Cooperation), and the Ministry of Family, Labour and Social Policy (Labour Market Department and Department of Social Integration). Useful exchanges also took place with the Deputy Commissioner for Human Rights and the Director of the Migrants' Rights Department, the Office of the United Nations High Commissioner for Refugees (UNHCR) in Poland, the International Organisation for Migration (IOM) in Warsaw, as well as with representatives of civil society organisations (CSOs), that is, The Rule of Law Institute, Polish Migration Forum, Association for Legal Intervention, La Strada and Helsinki Foundation for Human Rights.

During the mission the DMR delegation also visited the Lesznowola immigration detention centre, which is under the supervision of the Ministry of Interior and Administration and managed by the Border Guard, with a capacity of 300 persons,² which has a special section hosting families with children and unaccompanied minors. It is a closed guarded detention

¹ The main share of recipients of temporary protection is concentrated in a few countries, which together accepted more than half of all persons who left Ukraine: Germany (28%), Poland (24%) and the Czech Republic (9%). See ["UKRAINIANS ABROAD: Access to Public Services in the Context of Temporary Protection Status and Expected Return"](#), Secretariat of the Ukrainian Parliament Commissioner for Human Rights and Council of Europe Office in Ukraine, December 2025, p.11. See also [EUAA, Ad hoc Report: Situation in Ukraine and Displacement to the EU+](#), September 2025.

² See also [Detention centre - Global Detention Project | Mapping immigration detention around the world](#).

centre,³ one of the six guarded detention centres (GDC) for foreigners in Poland. The migrants and asylum seekers are placed there due to their being subject to a return procedure or awaiting a decision on granting international protection.

At the time of the visit, the facilities and the conditions of detention presented to the delegation were at a level that could serve as an example of good practice.⁴ The number of detainees was less than half of the full capacity, while the number of staff was around 200 persons working in shifts (160 border guards and 40 civilians). At the time of the DMR's visit, there were some families with eight children out of which reportedly half were of school age and therefore attended school under the Polish educational system (teachers were coming to the GDC), and there was also one unaccompanied minor. The average stay of unaccompanied minors in the GDC was estimated at less than one month.

The detainees need to follow strict daily schedule and regulations (including the visitation rules) and required to hand over certain personal belongings to a secure storage facility. The authorities noted that the detainees are informed of their rights and obligations (translated into 25 languages), and that social assistance is tailored based on each person's needs.⁵ The design of rooms and family rooms is mindful to the family structure and number of members, and the medical care is well-organised, while certain medical attention can be provided onsite. The GDC appeared well equipped in terms of educational, cultural and sports activities. More precisely, the children have access to basic learning in age-adapted classrooms, to play-rooms equipped with various toys, and to playgrounds, the detainees have access to a fully equipped gym, computer rooms with the access to internet, library, dining room, catering which respects their dietary preferences, kitchens in which they may prepare their own meals upon making requests for the provision of the ingredients, and chapels for different religions intended for religious practices.

In this context it is noted that in November 2025 Poland submitted an [Action Report](#) to the Council of Europe Committee of Ministers concerning the execution of the [Bistieva group of judgments delivered](#) by the Court. Poland has reported the adoption of a number of legislative and other reforms. Key among these was the entering into force on 1 May 2014 of the new Act on Foreigners (of 12 December 2013), which introduced alternatives to migrant detention and requires authorities to assess such alternatives as a first resort before detaining migrants, particularly families with children. According to the Government, courts now play a larger role in ordering (as a last resort upon the request of the Border Guard) and overseeing detention, must explicitly consider the best interests of the child, and ensure decisions that are communicated in an understandable language with guaranteed rights to appeal and legal assistance. Statistical data shows an increased application of alternatives to detention and a steady decline in the detention of migrant children in guarded centres in recent years (from 571 in 2021 to 68 in 2024).

³ The placement in the detention centre is based on a decision of the locally competent (district) court and being guarded means that the person sent there cannot individually decide whether they want to stay or leave, so these centres may be perceived as penitentiary in nature, although the detention is administrative.

⁴ The adequacy of the conditions is supervised by the Commissioner of Human Rights and the Penitentiary Judge.

⁵ The screening is performed prior to arrival to the GDC.

2. An outline of the developing migration policies in Poland

During the mission Government officials informed the DMR delegation about major migration trends in the country,⁶ including a recorded higher demand in labour and higher study-related residence permits and long-term visas, as well as a decline in the applications for the temporary protection (under the 2001 EU [Temporary Protection Directive](#)).

In October 2024, the Polish Council of Ministers adopted the new migration strategy under the title *"Regain Control. Ensure Security." Migration Strategy for 2025–2030*.⁷ It establishes national security as its fundamental principle, built around controlled migration management, border integrity, prevention of abuse (including the instrumentalisation of migration by neighbouring States), selective labour migration and migrant integration. The framework involves ongoing legislative reforms, increased digitisation, and a selective approach to both migrant entry and integration, with explicit provisions for rapid adaptation to perceived security threats and a pronounced focus on the impact of migration on social cohesion and economic modernisation.

The strategy is structured around eight pillars, covering security and institutional dimensions, rules for accessing territory and legal stay, access to national and international protection, labour market admissions, educational migration, integration, citizenship and repatriation, and cooperation with the Polish diaspora. It is noted that migrant integration is treated as essential for the sustainability of the country's migration strategy, with particular attention paid to language acquisition and cultural adaptation.⁸

3. Overview of the reception and protection of war-displaced Ukrainians in Poland

Poland has provided shelter and aid to large number of war-displaced persons from Ukraine, since February 2022, when the war of aggression by Russia started. In her findings from the [country visit \(fact-finding mission\) to Poland in 2022](#), the former Special Representative of the Secretary General of the Council of Europe (SRSG) highlighted the generosity and rapid mobilisation of Polish authorities, civil society, and individuals in providing immediate assistance and protection to refugees fleeing Ukraine. The legislative response, through the March 2022 Law "on assistance to citizens of Ukraine in connection with armed conflict on the territory of that country" ("Special Law"), ensured swift access to temporary protection, healthcare, education, and labour market integration for eligible refugees, with over a million registered for essential benefits. Strong coordination between State authorities, local governments, international organisations, and CSOs was observed, resulting in well-organised reception centres and effective, inclusive first-line support for vulnerable groups. At the same time, there were identified challenges related to incomplete registration of refugees, particularly among vulnerable groups such as children, language barriers, gaps in

⁶ During the mission, interlocutors mentioned that there have been new increased arrivals from India, Philippines, as well as workers arriving from Latin American and various Asian and African countries, including a number of women from Zimbabwe starting studies for medical assistants.

⁷ See the document in Polish in Rada Ministrów, [Odzyskać kontrolę. Zapewnić bezpieczeństwo. Kompleksowa i odpowiedzialna strategia migracyjna Polski na lata 2025–2030](#). Uchwała nr 120 z dnia 15 października 2024 r. Kancelaria Prezesa Rady Ministrów.

⁸ For further information see ["EMN Asylum and Migration Overview 2024 in Poland"](#), Part 2, Poland 2024, Warsaw 2025, and see also OECD's International Migration Outlook 2025, [chapter on Poland](#).

psychological support, difficulties faced by non-Ukrainian and Roma refugees in accessing rights and services, the need for a systematic vulnerability assessment, and the requirement for more comprehensive information and long-term planning for the inclusion and protection of all displaced Ukrainians.

According to data available as of late September 2025, approximately 4.39 million Ukrainians resided in European Economic Area and Schengen countries under temporary protection,⁹ with Poland hosting around 24% of these,¹⁰ equating to approximately 1.05 million individuals. Also, data indicate that more than 1.8 million Ukrainians have applied for temporary protection in Poland, and as of early 2025, there were around 980,000 active PESEL UKR status registrations¹¹ for Ukrainian refugees, signalling their continued large-scale presence and need for support in the country.¹²

Data available indicate that most of the Ukrainian displaced persons in Poland are women and children, with about 170,000 Ukrainian children enrolled in Polish schools, while approximately 150,000 are still outside the formal education system.¹³ Surveys¹⁴ highlight that Ukrainian refugees in Poland have had a net impact of 2.7% of the Polish GDP (2024), being highly active in the labour market, with a 78% employment rate among immigrants, though unemployment remains significantly higher for refugees compared to Polish nationals. The majority reside in urban areas, with one-third facing challenges in accessing healthcare and one in five experiencing difficulties securing stable housing. In terms of integration, the majority of Ukrainian children have accessed Polish education, yet language barriers, lack of friends, and reduced living standards are repeatedly cited by parents as major challenges.¹⁵ These findings highlight both the successful aspects of Poland's response, such as high levels of labour market integration and school enrolment, and ongoing vulnerabilities related to housing, healthcare, and legal status transitions as temporary protection policies evolve.¹⁶

3.1 Main measures and ongoing actions developed by Polish authorities in response to the displacement of Ukrainians

The Polish authorities' response to the war-related displacement of Ukrainians is praiseworthy. As noted above, Poland introduced the 2022 "Special Act" following Russia's full-scale invasion. Under that Act, nearly 1.6 million Ukrainians who arrived after 24 February 2022 received automatically renewable legal stay, labour-market access, and broad social entitlements without the usual administrative requirements.

⁹ ["UKRAINIANS ABROAD: Access to Public Services in the Context of Temporary Protection Status and Expected Return"](#), Secretariat of the Ukrainian Parliament Commissioner for Human Rights and Council of Europe Office in Ukraine, December 2025, p.11.

¹⁰ Ibid.

¹¹ PESEL is an 11-digit number assigned to every person officially registered in Poland, equivalent to a social security number. It encodes basic information about the holder (date of birth, sex, and a check digit) and serves as the universal identifier across Polish public administration.

¹² For further information see the UNHCR [Document - Poland: 2025-2026 Regional Refugee Response Plan - Poland Chapter \(ENG\)](#), 12 February 2025, p.3.

¹³ For further information see the UNHCR [Document - Poland: 2025-2026 Regional Refugee Response Plan - Poland Chapter \(ENG\)](#), 12 February 2025, p.4.

¹⁴ For further information see the [National Bank of Poland Survey report](#) (Publications about migration inflows and outflows | Narodowy Bank Polski - Internetowy Serwis Informacyjny)The living and economic situation of migrants from Ukraine in Poland in 2024, 27 January 2025; [UNHCR and Deloitte, Analysis of the impact of refugees from Ukraine on the economy of Poland](#), June 2025.

¹⁵ Ibid.

¹⁶ See [Key figures on immigration and emigration for Poland by OECD](#) in "International Migration Outlook 2025", 3 November 2025.

Many Ukrainians were able to rather swiftly integrate into the society, found jobs to support themselves. Furthermore, according to the data presented to the DMR delegation by the Ministry of Family, Labour and Social Policy (Labour Market Department), between 2022 and 2025 there was a significant increase of Ukrainians holding permanent jobs or running their own businesses, a decrease in unemployment and slight decrease in the number of those who are professionally inactive. Out of programmes financed by the Labour Fund and the National Training Fund, the programme “Together we can do more” specifically aimed at aiding Ukrainians integrating the labour market and society.¹⁷

However, according to 2025 National Bank of Poland statistics, approximately 36% of the displaced Ukrainians and 25% of pre-war migrants work below their qualifications.¹⁸ The DMR delegation discussed the above issue with the Government officials, the Deputy Commissioner for Human Rights and CSOs representatives. The recognition for academic purposes and for professional purposes which includes the practicing of regulated professions¹⁹ is carried out by [NAWA - the Polish National Agency for Academic Exchange](#).²⁰ It is highly digitalised and applications for the recognitions can be done online. It has been noted that although being partner of the Council of Europe [European Qualifications Passport for Refugees \(EQPR\)](#), no full use of this tool has been made in practice in cases where is insufficient or missing documentation.

Exchanges with interlocutors during the mission focused on their view on the possibility of recognition of regulated professions in the medical care field. DMR was informed that initially, these professions were recognised within a quite fast time frame. However, subsequently, the practice showed that the academic level or skills attained did not correspond to the ones required in Poland, and therefore the procedure needed to be revisited. Another factor that has acted as barrier is the knowledge of the Polish language by third country nationals, including Ukrainians. Interlocutors during the mission indicated that women often have difficulties in following trainings related to professional qualifications because they need to care for their children, which puts them in an even more difficult position.

3.2 New legislation aimed at transiting out of the temporary protection

At the outset it is noted that while temporary protection (TP) for Ukrainians in the EU has been extended until 4 March 2027, in September 2025 the Council of the European Union has issued a [Recommendation](#) on a coordinated approach to the transition out of temporary protection for Ukrainian displaced persons. The Recommendation provides guidance to EU member States concerning measures to: promote the transition into other legal statuses

¹⁷ For the general assessment of the programme published in an audit report (in Polish) see [Najwyższa Izba Kontroli \(2025\). Program Aktywizacyjny dla Cudzoziemców „Razem Możemy Więcej”. Nr ewid.121/2024/P/24/034/KPS. Warszawa, kwiecień 2025.](#)

¹⁸ See [The living and economic situation of migrants from Ukraine in Poland in 2025. Survey report](#) available at [Publications about migration inflows and outflows | Narodowy Bank Polski - Internetowy Serwis Informacyjny](#), Report published on 27 January 2025 and the report published on 25 November 2025.

¹⁹ For more information on practicing regulated professions in Poland see [Practicing regulated professions - NAWA](#).

²⁰ See [The ENIC and NARIC networks and the implementation of the Lisbon Convention - Higher education and research](#).

before the end of TP;²¹ pave the way for a smooth and sustainable reintegration in Ukraine; ensure information provision to displaced persons; ensure coordination, monitoring and exchange of information among member States and with the Ukrainian authorities.

The new 2026 “Phasing-Out Act” in Poland²² is replacing the provisions of the Special Act mentioned above with amendments to the general Law on Foreigners. While the 2026 Act retains some elements of the existing framework, including the continuation of temporary protection until 4 March 2027, it also introduces changes designed to progressively align the status of beneficiaries of temporary protection with the broader regime applicable to third-country nationals. Under the 2026 Act, access to temporary protection is linked to compliance with specific registration requirements. In particular, persons seeking to benefit from temporary protection are required to register for PESEL-UKR²³ status within 30 days of entry.

Certain interlocutors indicated that this requirement may create practical difficulties for certain categories of persons who may not be able to complete registration within the prescribed time frame or who encounter obstacles in providing the necessary documentation. In such situations, individuals may face uncertainty regarding their eligibility to remain within the temporary protection framework or to access related assistance. This may in particular concern persons displaced from the temporarily occupied territories of Ukraine as well as de facto or de iure stateless persons.²⁴

The 2026 Act also introduces time-limited accommodation support. Under the revised framework, accommodation and subsistence assistance in collective facilities may be granted for a limited period, generally up to 60 days, with an overall maximum period of 12 months. Some interlocutors noted that such limitations may not fully reflect the potentially prolonged nature of displacement caused by ongoing armed conflict.²⁵ Persons from vulnerable groups have free and time-unlimited access to collective accommodation during the whole period of temporary protection.

²¹ See also DMR, Thematic Paper, [Ensuring a Human Rights-Compliant End to Refugeehood through Integration, Naturalisation or Voluntary Repatriation](#), 2025 esp. section on EU law - end of temporary protection.

²² The Act on the phasing out of the solution from the Act on Assistance to Citizens of Ukraine in the Context of the Armed Conflict and on the amendments of certain other acts entered into force on 5 March 2026.

²³ PESEL serves as the universal identifier across Polish public administration: healthcare, taxation, banking, social benefits, employment, and so on. For Ukrainians specifically, those registered under the Special Act received a PESEL number tagged with the code UKR, which flagged their temporary protection status and gave them access to the associated entitlements (schools, healthcare, social assistance, the labour market) without going through standard immigration procedures. That is why the new law's requirement to register for a PESEL within 30 days is significant: without it, a person has no administrative footprint in Poland and cannot access any of those services.

²⁴ See also UNHCR Representation in Poland. *Comments and Observations: Act on the Phasing Out of Assistance to Citizens of Ukraine in the Context of the Armed Conflict, and Amendments of Certain Other Acts (“the Phasing Out Act”)*. January 2026. UNHCR data indicate that in 2024 there were recorded 1 487 stateless persons in Poland, see UNHCR [Poland Fact Sheet](#), February 2025. Poland has not as yet ratified the Council of Europe 1997 Convention on Nationality (ETS No. 166), or the 1954 and 1961 UN Conventions on Statelessness and reportedly has not as yet established a statelessness determination procedure (idem).

²⁵ Ibid.

3.3 The situation of Ukrainian displaced children

Provision of medical and social welfare services

The majority of war-displaced Ukrainians in Poland are women and children.²⁶ Child protection and welfare remain central concerns for national authorities, especially as regards unaccompanied and separated children, children with disabilities, and those living in collective accommodation. The 2025–2026 Refugee Response Plan for Poland highlights the need for safe spaces, comprehensive support, and targeted interventions for children in collective centres or out of school. However, the capacity of national child protection systems appears to be stretched, with persistent gaps in case management, social services, and access to family-based care. Notably, reportedly only 36% of households know where to report incidents such as sexual exploitation or abuse, underscoring the need for improved communication and awareness around child protection and gender-based violence services.²⁷

Specific vulnerabilities²⁸ of children are further compounded by trauma, separation from family, and disability. Psychosocial support and mental health care for refugee children is in high demand, but access is reportedly constrained by language barriers, awareness, and service capacity. Reportedly roughly 10% of children in Polish foster care have disabilities,²⁹ a proportion that highlights the need for improved registration and specialised services. National guidelines now emphasise trauma-informed, child-centred, and multi-disciplinary approaches in all child protection efforts.

Schooling

Polish legislation guarantees Ukrainian children under the temporary protection regime the same rights to education and social protection as Polish nationals. Despite certain sources reporting high enrolment levels to schools,³⁰ significant barriers to schooling reportedly persist. According to UNHCR data, in 2024, about 170,000 refugee children were enrolled in Polish schools, but as many as 150,000 children remained outside Polish formal education, (participating in Ukrainian education system on-line)³¹ hampered by language difficulties, limited school capacity, and a strong preference among some families for continuing the Ukrainian online curriculum. Ukrainian children most commonly struggle with lack of Polish language proficiency (36%), absence of friends (33%), and a perceived drop in their standard of living compared to pre-war conditions (29%).³² More than half of those enrolled continued attending Ukrainian online school in parallel, which partially limited their integration and social interaction with local peers. Since school year 2024/2025 all Ukrainian refugee pupils are obligatory enrolled in Polish formal education system. According to System of Educational

²⁶ UNHCR Document - Poland: 2025-2026 Regional Refugee Response Plan - Poland Chapter (ENG), 12 February 2025, p. 2.

²⁷ UNHCR Document - Poland: 2025-2026 Regional Refugee Response Plan - Poland Chapter (ENG), 12 February 2025, p. 4.

²⁸ See DMR Thematic Paper, [Vulnerability of migrants, asylum seekers and refugees: Council of Europe and European Union standards](#), 2025.

²⁹ For further information see European Disability Forum, [Bridging the gaps](#) - Four studies of the situation of Ukrainian children with disabilities and their families since the war began - An extended summary, February 2023.

³⁰ Such as 90% according to the [National Bank of Poland Survey report](#) (Publications about migration inflows and outflows | Narodowy Bank Polski - Internetowy Serwis Informacyjny)The living and economic situation of migrants from Ukraine in Poland in 2024, 27 January 2025.

³¹ UNHCR Document - Poland: 2025-2026 Regional Refugee Response Plan - Poland Chapter, 12 February 2025, p. 4.

³² For further information see the [National Bank of Poland Survey report](#) (Publications about migration inflows and outflows | Narodowy Bank Polski - Internetowy Serwis Informacyjny)The living and economic situation of migrants from Ukraine in Poland in 2024, 27 January 2025.

Information (as of 23 February 2026) out of 261.523 of pupils in Poland with Ukrainian citizenship 186.984 are pupils with PESEL UKR status registrations under temporary protection (who came to Poland after 22 February 2022).

According to the Department of Social Integration of the Ministry of Family, Labour and Social Policy, integration through schooling is progressing. In their view, linking social benefits to school attendance has significantly increased enrolments among Ukrainian children, supporting both children's and families' social adaptation. Government officials met during the mission also described the path of ensuring Ukrainian refugee children's access to education, first by following online Ukrainian programme, and after a year of continued displacement, by enrolling them into Polish schools. They also mentioned that there are targeted measures for youth and the possibility to participate in classes on the language and culture of the country of origin, as well as anti-bullying and anti-discrimination and exclusion measures which were also observed as obstacles in smooth integration of children.

Adequate accommodation

The suitability of collective accommodation for children is sometimes reported as limited as mass reception centres and collective facilities often expose children to an increased risk of violence, neglect, and a lack of privacy or dedicated space for learning and play. Identified best practices in this field in Poland³³ include equipping reception centres with child-friendly play areas, engaging qualified professionals in educational and recreational programming, and adapting environments to meet children's developmental and emotional needs.

The situation of unaccompanied and separated children

Unaccompanied and separated children are covered by Article 25 of the aforementioned Special Law, which regulates temporary guardianship, foster care, and mandatory registration, often with verification of nationality in cooperation with Ukrainian authorities. The Blue Dot initiative, led by UNICEF and UNHCR alongside the Polish government, had established support hubs for separated and unaccompanied children throughout the country.³⁴

Legislative amendments adopted in January 2026³⁵ have expanded the grounds for placement of unaccompanied minors aged 15 to 18 in guarded detention centres in Poland. Previous experience indicates that unaccompanied minors placed in open-type care custodial institutions have been absconding from these facilities on a mass scale, thereby abusing the asylum system. The lack of information regarding the identity of their smugglers with whom they fled poses a serious risk to their safety particularly in the context of human trafficking. The authorities explained that the new detention regime aims to provide protection in light of the insufficient foster care system in Poland. However civil society organisations and international bodies have noted that this raises issues of compatibility notably with the standards contained Council of Europe Committee of Ministers [Recommendation CM/Rec\(2019\)11 on effective guardianship for unaccompanied and separated children](#) in the context of migration, as well as [Recommendation CM/Rec\(2022\)17](#) on protecting the rights of migrant, refugee and asylum-seeking women and girls. Under these standards, there is notably a need for individual vulnerability assessment, prioritisation of non-custodial and age-appropriate solutions.

³³ See AIDA-ECRE [Country Report Poland, July 2025](#), Reception Conditions, Special reception needs of vulnerable groups, pp. 85-87.

³⁴ The Blue Dot Hubs are now closed. See [Closure of UNICEF and UNHCR Blue Dot Hubs in Poland](#).

³⁵ Amendment to Art. 88a(3)(3) of the Act of 13 June 2003 on Granting Protection to Foreigners on the Territory of the Republic of Poland, introduced by the Act of 20 March 2025 on the conditions for entrusting work to foreigners (Dz.U. 2025 poz. 337), in force from 1 January 2026.

During the mission, various interlocutors indicated the need to further enhance the systematic identification of vulnerable children and best interests' procedures. Reportedly age assessment of migrant children frequently relies on medicalised methods such as X-ray or dental examinations, while documentary and psychosocial evidence may receive insufficient consideration.³⁶ In this context it is noted that under [Recommendation CM/Rec\(2022\)22 of the Committee of Ministers on human rights principles and guidelines on age assessment in the context of migration](#), age assessment requires appropriate, multidisciplinary assessment procedures. Nonetheless, at this point the Border Guard underlines that there are dedicated procedures for both identifying vulnerable groups and assessing the child's best interests at various stages of activities carried out towards foreigners.

3.4 The situation of displaced Roma from Ukraine

During the mission certain interlocutors indicated that the Ukrainian Roma who sought refuge in Poland have faced unique and severe challenges that distinguish their experience from other groups of displaced persons. Reported estimates of the number of Ukrainian Roma in Poland range from 10,000 to 15,000. A distrust of authorities and assisting CSOs, combined with the history of discrimination of Roma in Europe, creates substantial barriers to securing independent housing to these persons.³⁷ As a result, they are frequently forced to reside in collective shelters, where conditions are basic and opportunities for social integration are limited. Moreover, interlocutors pointed to the existing difficulty of placing Ukrainian Roma in shelters due to cultural and lifestyle factors associated with their extended family structure: limited space makes it challenging to accommodate entire extended families, and when this is done, it often results in their further exclusion from other groups or the wider society.

Furthermore, Ukrainian Roma often face significant documentation problems, frequently lacking or with invalid proof of citizenship and therefore being regarded as at least de facto stateless. This creates major barriers to accessing rights and regularising their stay in Poland, particularly as the Ukrainian embassy reportedly lacks capacity to issue new documents for all those in need. The introduction, from March 2026, of a 30-day deadline for new arrivals to provide valid Ukrainian travel documents in order to maintain protection is reportedly expected to disproportionately affect Roma and other de facto stateless persons on the move.

4. Development of social inclusion and integration of migrants and refugees in Poland

During the meeting with the DMR delegation, the Department of Social Integration of the Ministry of Family, Labour and Social Policy emphasised that foreigners' social integration is a major focus for the Ministry (in practical terms: mainly Ukrainians as they consist approx. 80% of foreigners in Poland). The above Department is directing efforts toward education, local integration, language development, access to public services, and institutional support. The officials noted that Ukrainians in the country are not a uniform group, with integration experiences varying widely depending on factors such as pre-existing ties in Poland and the timing of arrival.

³⁶ See AIDA-ECRE [Country Report Poland, July 2025](#), Reception Conditions, Special reception needs of vulnerable groups, p. 50.

³⁷ See ECRI Report on Poland ([sixth monitoring cycle](#)), 18 September 2023, p.24

Positive integration trends are most visible among those with family or community networks in Poland. This includes greater participation in language courses, increased school enrolment, and engagement in the housing market. However, challenges remain in urban infrastructure, particularly regarding housing shortages in large cities where demand is highest. In response, authorities are encouraging settlement in smaller towns, where housing and service access are more readily available.

Government officials stated that Poland is developing a comprehensive integration strategy with a strong role for local governments as primary implementers and that the cooperation with partners such as the Council of Europe, notably through its [Intercultural Cities \(ICC\) Programme](#) (in which currently three Polish cities (Krakow, Lublin and Wroclaw³⁸) are participating), is seen as key to building long-term, inclusive integration policies at the local level.

Institutional backing to social inclusion and integration is provided by 34 Foreigners' Integration Centres (CICs)³⁹ across the country. Twenty of them are financed by the Asylum, Migration and Integration Fund, and fourteen by the European Social Fund. The Head of the Division of National Network of Integration explained that the authorities' plan was to establish a total of 49 Foreigners' Integration Centres (CICs) across its 16 voivodeships, modelled on the migrants "one-stop shop" system in Portugal, to provide newly arrived migrants with streamlined access to a wide range of services, such as residency information, legal support, and social assistance, all of them in a single location. Funded by the European Commission's Asylum, Migration, and Integration Fund (AMIF), these CICs are set up through cooperation between local authorities, the Government, and CSOs, and act as cooperation platforms engaging multiple state services and using cultural mediators to facilitate effective, culturally sensitive support for migrants.

Professional integration reportedly remains a challenge, particularly for highly qualified Ukrainian refugees who encounter barriers to practicing their professions. The above Department confirmed the previously described findings, i.e. that many work below their level of qualification,⁴⁰ despite labour shortages in various fields. Additionally, individuals without support networks or with strong emotional ties to Ukraine may hesitate to fully integrate for fear of weakening their national identity or hindering future return. The Government is addressing this through targeted communication, emphasising that integration can complement, rather than diminish, national identity.

Lastly, linguistic integration has been noted as critical, but it appears that there is not yet a unified, national system for teaching Polish as a second language. It has been reported during the mission that some municipalities and CSOs offer language classes, but provision remains fragmented. A minimum of 200 hours is needed for basic communication, however, formal B2 proficiency requires much more. Language learning is closely tied to labour market integration and is a prerequisite for citizenship.

³⁸ In [the ICC Programme Index](#) (2025), Krakow has achieved the maximum score in the area of political commitment, reflecting sustained leadership and institutional support for inclusion policies.

³⁹ Also referred as National Integration Offices in the Position paper of the Department of Social Integration of the Ministry of Family, Labour and Social Policy.

⁴⁰ See above-mentioned UNHCR and Deloitte Analysis (June 2025).

5. The migratory pressure at Poland's eastern border

According to the Bureau of Analyses and Situational Awareness⁴¹ the situation at Poland's eastern border, particularly with Belarus, has been marked by ongoing migratory pressure and significant changes in border protection and migration management over recent years. From 2021 to 2025, the Polish-Belarusian (PL-BY) border recorded high levels of illegal border crossing attempts, with 2025 figures still nearly 2.5 times higher than those for Latvia and almost 20 times higher than Lithuania, even as trends shifted regionally, reflecting an artificially controlled migration flow managed by Belarusian authorities. Episodes of violence and border incidents, such as daily assaults on guards, continue to be reported.

Poland has taken a series of measures to address the instrumentalisation of migration by Belarus, a phenomenon seen as a hybrid threat to Poland's and EU's security. The 2021 legal amendments⁴² introduced swift return orders for those apprehended immediately after illegal border crossing, with a ban on re-entry to Poland and the Schengen area for up to three years. The right to appeal is preserved but does not suspend enforcement, and Belarus is treated as a safe third country for return purposes. Also, legislative changes as from March 2025⁴³ have suspended the possibility of lodging asylum applications at the Belarusian border, except in limited circumstances—for unaccompanied minors, pregnant women, individuals requiring special care, or persons facing clear risks upon return.⁴⁴ With respect to screening and the protection of vulnerable groups, new legal frameworks and training protocols have been introduced. Polish authorities report they have implemented a recognition questionnaire and increased training on human rights, vulnerability screening, and intercultural communication for Border Guard officers. These initiatives are intended to improve the identification and treatment of at-risk individuals at the borders.

In this context it is noted that in response to the [M.K. group](#) of judgments delivered by the Court, Poland has submitted to the Committee of Ministers an [Action Plan](#) (latest dated October 2025) indicating a number of measures adopted. These include the repeal of certain discretionary powers for refusing asylum applications, and the introduction of a multilingual declaration form to record the intentions of persons at the border, and training activities for border guard officers. The Committee of Ministers continues to monitor the implementation of these judgments and encourages further efforts to ensure the effectiveness and protection of human rights and the rule of law at the borders.

Conclusion

The mission to Poland provided the opportunity for DMR to observe a number of proactive and constructive measures by Polish authorities to support migrants and refugees. The Government's rapid introduction of broad legal entitlements for war-displaced Ukrainians has enabled access to employment, education, healthcare, and social benefits, establishing

⁴¹ Document titled "Situation on Polish eastern external border sections – data, trends, profiles and modus operandi" by the Polish Border Guard HQ, January 2026.

⁴² Act of 17 September 2021 amending the Act on Foreigners and certain other acts (*Dz.U.* 2021, item 1918), in force from 26 October 2021 and Act of 17 November 2021 amending the Act on State Border Protection and certain other acts, *Dz.U.* 2021, item 2191.

⁴³ Since 27 March 2025, the right to apply for international protection at the Polish–Belarusian border has been restricted pursuant to Art. 33a of the Act of 13 June 2003 on Granting Protection to Foreigners on the Territory of the Republic of Poland, as amended by the Act of 21 February 2025 (*Dz.U.* 2025 poz. 389), implemented by the Regulation of the Council of Ministers of 27 March 2025 (*Dz.U.* 2025 poz. 390).

⁴⁴ See AIDA-ECRE [Country Report Poland, July 2025](#), Overview of main changes since the previous report update, pp. 13-16.

Poland as an important refuge for those fleeing the conflict in Ukraine. The creation and planned expansion of Foreigners' Integration Centres, increased investment in language and employment support, and active collaboration with municipal governments and civil society organisations all demonstrate a commitment to promoting social inclusion and integration. As Poland begins to phase out temporary protection for Ukrainian refugees, legislative changes in force as from March 2026 require many to transition to temporary residence permits.

Furthermore, the country mission has enabled the DMR to identify areas in which the Council of Europe may render practical assistance to the authorities of Poland such as:

- provision of expertise and developing training activities (also by use of the Council of Europe [HELP Programme](#)) for border guards and legal professionals concerning migrant children's age assessment, guardianship, reception and after care support;
- development of cooperation activities to enhance the capacities of varied professionals on lawfulness of detention, procedural safeguards, detention conditions, access to legal aid, and effective alternatives to immigration detention, drawing, *inter alia*, on the Council of Europe standards and the extensive work of the [Steering Committee for Human Rights](#) in this area;
- development of cooperation activities to strengthen alternative care arrangements for unaccompanied children on the move by, among others, mapping existing interim and long-term care options; developing practical guidance and tools for the expansion, effective management, and monitoring of alternative care arrangements; implementing capacity-building programmes for social workers, foster care providers and other relevant professionals; and promoting broad awareness-raising efforts to emphasise the benefits of family-based care;
- capacity building activities for service providers on trauma-sensitive communication and basics of psychological skills to ensure they know better to work with service recipients who show signs of PTSD, distress, aggression or other agitated emotional conditions;
- development of cooperation activities in order to enhance practitioners' capacity to provide, especially trauma-informed, vulnerability assessments and protection to children and other social groups of displaced persons;
- development of cooperation activities in order to enhance legal protection, and social inclusion of stateless persons, especially Roma and children, drawing on Council of Europe standards and other member States' promising practices;⁴⁵
- provision of advice in order to enhance the incorporation and effective use by the authorities of the Council of Europe [European Qualifications Passport for Refugees](#), in cases where there is missing or insufficient documentation;⁴⁶
- support and reinforce Polish cities' participation in the Council of Europe's [Intercultural Cities \(ICC\) Programme](#), in which Krakow, Lublin and Wroclaw already are active.
- support the integration strategy developed by Poland, by strengthening its multilevel governance aspect, including through coordination mechanisms between local, regional, and national authorities to ensure coherent and effective policies on inclusion and integration.⁴⁷

⁴⁵ See Council of Europe, CDCJ, [Compendium of Promising Practices on Access to Nationality for Stateless Children](#), 2026.

⁴⁶ See also [Recommendation CM/Rec\(2025\)6](#) of the Committee of Ministers to member States on qualifications and linguistic competences of refugees in Europe.

⁴⁷ See [Recommendation CM/Rec\(2022\)10](#) by the Committee of Ministers to member States on multilevel policies and governance for intercultural integration, and Council of Europe, CDADI, [Model Framework for an Intercultural Integration Strategy at the National Level. Intercultural integration strategies: managing diversity as an opportunity](#), 2021.