



MIGRATION · AFFECTIVE GEOPOLITICS · EUROPEAN DEMOCRACY

# Ukrainian Forcefully Displaced People under Temporary Protection in the Baltic Sea Region

Labour Market, Education, and Housing in Comparative  
Perspective

## Deliverable 2.1

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# Executive Summary

This comparative report presents an integrated analysis of how six countries of the European Union – **Finland, Germany, Latvia, Lithuania, Poland, and Sweden** – have implemented the Temporary Protection Directive (TPD, Council Directive 2001/55/EC) in response to the arrival of forcibly displaced persons (FDPs) from Ukraine following Russia's full-scale invasion in February 2022. The report constitutes Deliverable D2.1 within Work Package 2, which focuses on everyday encounters between state actors and migrants across 6 countries in the Baltic Sea Region (BSR). WP 2 forms part of the Horizon Europe project Migration, Affective Geopolitics and European Democracy in Times of Military Conflicts (MAGnituDe).

The report draws on six country-specific reports included as Annexes 1–6 (CRs) produced within the same task. It synthesises findings from desk-based analysis of national policies in three key migrant-related policy areas – the labour market, housing and education – and supported by 41 thematically analysed expert interviews with 49 SLBs and CSO administrators (2 per policy area, 3 per country). The information gathered from experts is a valuable source of insight into the everyday encounters between FDPs, CSOs and SLBs. MAGnituDe emphasises that first encounters between FDPs and receiving states can have a long-lasting effect on how migrants perceive their new states of residence and whether they develop sufficient trust in state institutions to engage in democratic life. The report thus provides both a macro-level analysis of governance and legislation and a micro-level insight into policy enactment and interactional dynamics, contributing to the project's overarching goal of understanding how European democracies respond to forced displacement under conditions of geopolitical conflict and affective polarisation.

One of the main contributions of this report is that it critically examines the TPD implementation from a multi-level governance (MLG) perspective. It shows that while the Directive has initially received unified support, over time it has produced divergent practices, coordination models, and outcomes across Member States, with pronounced local variations. The centrality of local authorities underscores a key insight of MLG analysis: policy implementation depends as much on local capacity, coordination, and discretion as on national legislation. Taken together, these governance patterns illustrate how a shared EU-level entitlement translated into diverse national and local realities.

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The analysis shows that while all six countries ensured legal access to the labour market, housing and schooling, differences in administrative structures, municipal capacity, and discretion among the front-line actors exposed structural tensions between emergency-driven temporary measures and the protracted nature of displacement. These differences also reflect broader variations in welfare-state and migrant integration regimes, as well as administrative capacities, housing markets, labour market structures, and educational systems. Germany and Finland relied on long-standing welfare-state and previously developed migrant integration infrastructures. By contrast, Sweden— despite having well-developed refugee reception infrastructure and receiving far fewer FDPs — developed a fragmented and ad hoc response, with repeated legal changes producing unequal rights among Ukrainian FDPs. Lithuania and Latvia demonstrated strong coordination between national and municipal actors, despite more limited administrative capacity, whereas Poland faced an ambiguous division of responsibilities between national and local authorities, hindering the development of coherent integration measures.

Based on the comparative findings, MAGnituDe suggests that the following measures should be prioritised:

1. Aligning short-term protection with longer-term integration trajectories will be essential as the EU and Member States prepare for the transition beyond the expiry of the TPD in 2027.
2. Supporting municipalities, strengthening CSO partnerships, improving coordination, and ensuring equitable access to education, housing, and labour market opportunities will be critical to safeguarding the well-being of Ukrainian FDPs and enhancing the resilience of European migration governance.

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# Abbreviations

## Project Abbreviations

HUG	Help Ukraine Gothenburg - Sweden
UPF	Universidad Pompeu Fabra - Spain
LSMC	Lietuvos Socialiniu Mokslu Centras - Lithuania
KKNU	V. N. Karazin Kharkiv National University - Ukraine
UEF	Ita-Suomen Yliopisto - Finland
UG	Uniwersytet Gdanski - Poland
UGR	Universitaet Greifswald - Germany
ZAVOD APIS	Zavod Za Avtorsko Produkcijo Izobrazevanje Inovativnost In Sodelovanje - Slovenia
UGOT	University Of Gothenburg - Sweden

## Other

AMIF	Asylum, Migration and Integration Fund
BSR	Baltic Sea Region
CR	Country Report
CSO	Civil Society Organisation
EASO	European Asylum Support Office (now European Union Agency for Asylum)
ESF / ESF+	European Social Fund / European Social Fund Plus
EU	European Union

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EUAA	European Union Agency for Asylum
FDP	Forcibly Displaced Person
IOM	International Organization for Migration
MLG	Multilevel Governance
NGO	Non-Governmental Organisation
RIA	Reception and Integration Agency (Lithuania)
SLB	Street-Level Bureaucrat
TPD	Temporary Protection Directive (Council Directive 2001/55/EC)
TSL	Transport-Logistics
TUVA	Preparatory Programme for Upper Secondary Education (Finland)

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# 1. Introduction

This report is the result of collaboration among countries in the Baltic Sea region, which since February 2022 has been particularly affected by Russia's full-scale invasion and still ongoing war against Ukraine. On 31 October 2025, 4.3 million non-EU citizens, who fled Ukraine as a consequence of Russia's war of aggression, were residing in the EU under temporary protection (Eurostat, December 2025). More than 50 per cent of Ukrainian FDPs in the EU are residing in six countries that this report covers. The aim of the report is to synthesize the key points of the desk research and expert interviews regarding the national and local policies, legislation, and implementation practices concerning Ukrainians displaced by Russia's full-scale invasion. The report provides the analysis of the situation in six countries of BSR - **Finland, Germany, Latvia, Lithuania, Poland, and Sweden** (CRs: Finland Annex 1, Germany Annex 2, Latvia Annex 3, Lithuania Annex 4, Poland Annex 5, Sweden Annex 6). The analysis covers three key policy areas: labour market integration, housing, and education (for both adults and children). MAGnituDe project argues that these three domains are essential for basic welfare, self-sufficiency, and long-term integration of Ukrainian FDPs, but they are also areas where EU Member States' welfare regimes and administrative systems diverge most sharply. By analysing these policy areas comparatively, the report identifies both gaps in existing legislation and implementation practices related to the specific status of FDPs as well as good practices on the EU level, nationally and locally. Moreover, a comparative angle highlights shared governance challenges and country-specific solutions to managing the reception and inclusion of Ukrainian FDPs under the temporary protection.

Since 2022, a rapidly expanding body of research has examined the displacement of Ukrainians and the responses of receiving states, including analyses of the activation and implications of the Temporary Protection Directive (e.g. European Parliamentary Research Service, 2024; Hernes & Łukasiewicz, 2025; Fink & Kader, 2023; Koikkalainen et al., 2025), as well as studies focusing on labour market participation, welfare access, housing, and changing public attitudes towards Ukrainian FDPs across the EU member states (e.g. Blomqvist Mickelsson, 2024; ECRE, 2025; Eurofound, 2024; Kosyakova, et. al., 2024; EMN, 2024; Vigneri, et. al., 2025).



This literature has generated important insights into the exceptional nature of the EU's response, the differentiated treatment of Ukrainian FDPs compared to other protection seekers, and the broader consequences of the TPD for European asylum and migration governance. At the same time, much of this research has focused on legal frameworks, national-level policy design, or single-country cases, with more limited attention to how policies are interpreted and enacted across governance levels and in everyday institutional practice.

In dialogue with this growing body of research, the comparative report contributes by a novel analytical perspective, namely by combining a multilevel governance perspective with insights from the research on affective geopolitics and frontline implementation. By integrating desk-based analysis of legislation and policy documents with expert interviews with street-level bureaucrats (SLBs) and civil society actors (CSOs), the report links macro-level policy frameworks with the micro-level practices, perceptions, and emotional dimensions, through which temporary protection is materialised in practice. This integrated approach highlights how affective factors —such as perceptions of cultural proximity, solidarity, and uncertainty—intersect with institutional arrangements and discretionary decision-making, shaping both policy outcomes and the lived experiences of Ukrainian FDPs across different welfare regimes and administrative contexts (Spehar, 2025a, 2025 b).

This report pursues two main objectives. First, it situates national developments and implementation outcomes related to the TPD in six EU Member States within the broader EU framework of the directive, which was activated on 4 March 2022. While the directive establishes a shared minimum standard for legal residence, work, and social support, its translation into national legislation, institutional arrangements, and everyday implementation varies significantly across Member States. Understanding these variations is essential for assessing how the TPD operates as a multilevel governance mechanism, shaped simultaneously by supranational coordination, domestic policy traditions, and local administrative capacities.

Second, the report highlights the role of street-level actors and the affective dimensions of policy implementation. As emphasised by the MAGnituDe project's theoretical framework, migration governance is not only about formal regulations but also about how frontline actors — SLBs, such as social workers, employment caseworkers, and teachers, as well as CSOs, such as volunteers and NGO representatives — interpret, negotiate, and enact these rules in everyday encounters with Ukrainian FDPs.

Their practices and perceptions mediate the relationship between the state and migrants, shaping both the effectiveness of policy implementation and the lived experiences of FDPs.

## 2. Background

Both governments and societies in the countries under analysis expressed eminent solidarity with Ukraine and provided support to Ukrainians seeking protection from the war. Among the six countries that this report covers, Germany has taken in the largest total number of Ukrainian FDPs since the start of the Russian invasion, closely followed by Poland. Poland, however, has hosted the largest number of Ukrainian FDPs per thousand persons of the total population among the six countries, while the number of Ukrainian FDPs in Sweden is by far the lowest.

Table 1. Beneficiaries of temporary protection at the end of October 2025

Country	Total number	Ratio per 1000 people
Finland	77 335	13,72
Germany	1 229 960	14,71
Latvia	31 280	16,84
Lithuania	50 600	17,50
Poland	965 005	26,44
Sweden	48 315	4,56

Source:[https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Temporary\\_protection\\_for\\_persons\\_fleeing\\_Ukraine\\_-\\_monthly\\_statistics](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Temporary_protection_for_persons_fleeing_Ukraine_-_monthly_statistics).

Important to underline, six countries covered in the report have very different prior experiences with hosting asylum seekers, refugees and other categories of migrants. In 2015, Germany and Sweden provided protection to a large number of Syrian refugees (Schierenbeck, et al. 2023; Spehar, 2025b; Vigneri, et.al 2025). In Germany, the term “welcome culture” was coined in this context, while Sweden’s policy was considered as one of the most generous in the EU.

However, over the years since 2015, the increasing number of asylum seekers was largely framed as a ‘migration crisis’ (Triandafyllidou 2018) and the solidarity with incoming migrants has cramped under the pressure of public opinion as well as political and societal challenges (Danielsen & Hernes, 2025; Vigneri et al., 2025). Prior 2022, Latvia, Lithuania and Poland have had lesser experience with hosting asylum seekers and refugees. While Latvia and Lithuania received a small number of Syrian refugees, Poland together with the other Visegrad countries (the Czech Republic, Hungary and Slovakia) actively opposed the attempt to reallocate Syrian refugees within the European Union (Saatçioğlu 2021).

In relation to migrants from Ukraine, each of the studied countries have distinct histories prior the Russia’s full-scale invasion. In all countries, migration from Ukraine has been on the rise since 2014. For instance, in Poland, and to some extent Germany, Latvia and Lithuania, labour migration from Ukraine was quite prominent (Lashchuk, 2025; Kubiciel–Łodzińska et al. 2023). At the same time, in Sweden and Finland, Ukrainians comprised a small diaspora arriving to these countries as students, family members and to some extent workers (Shmulyar Gréen & Odynets, 2024; Koikkalainen et al., 2025). Another important dimension is that there are significant groups of Russian-speaking migrants in Latvia, Lithuania, Finland and Germany, comprising settled minorities living in these countries for a long time.

## 3. Methodological Note

### 3.1. Desk Research

Each country report (Annexes 1–6 (CRs)) is based on the desk research and expert interviews, providing both documentary and experiential evidence of how FDP-related policies have been designed and implemented. The desk research component involved a systematic review of:

- National and local legislation and policy documents regulating the reception, legal status, and integration of Ukrainian FDPs;
- Government reports, action plans, and administrative guidelines concerning the implementation of TPD;

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- Statistical data from official national and EU sources (e.g., Ministries of Interior, Migration Agencies, Statistical Offices, IOM, Eurostat);
  - Secondary sources including academic studies, policy analyses, and relevant media coverage.

This analysis focused specifically on three policy domains—labour market, housing, and education (including the education for children)—as these domains represent the key areas of Ukrainian FDPs' everyday well-being and are structured differently across welfare and governance regimes in the Baltic Sea Region. The desk research aimed to identify gaps and inconsistencies in national legislation and institutional frameworks, particularly regarding the status and entitlements of FDPs relative to other migrant groups (e.g., asylum seekers or labour migrants).

## 3.2. Expert Interviews

To complement and contextualize the documentary analysis, each national team conducted six semi-structured expert interviews—two per policy area—with key actors involved in the practical implementation or support of FDP-related policies. The total comparative sample includes 41 expert interview occasions with 49 interviewees with:

- Street-level bureaucrats (SLBs): representatives of public institutions (e.g., employment offices, municipal housing agencies, education authorities and institutions) directly involved in policy implementation;
- Civil society and non-governmental organisation (CSO) actors facilitating integration support, advocacy, or service delivery for FDPs in collaboration with local municipalities or independently.

The interviews were conducted locally in each country: in Germany in Berlin, in Poland – Gdansk, Gdynia, and Sopot, in Latvia – Riga, in Lithuania – Vilnius, in Finland- a region in Eastern Finland, and in Sweden – Gothenburg. The interviews aimed to capture professional interpretations of policies and practices, especially in cases where official regulations were generic, ambiguous, or lacked transparency in implementation. Through these interviews, the research identifies how street-level discretion, institutional coordination, and inter-organisational cooperation shape the actual outcomes of TPD's implementation.

The synthesis of both sources of data points out similarities and variations across national cases to reveal broader regional and local patterns and governance trends. It highlights how multilevel coordination, street-level discretion, and affective engagement together shape the effectiveness and equity of temporary protection in Europe.

## 4. Policy Context of the EU’s Temporary Protection Directive (TPD)

### 4.1. The origins and objectives of TPD

The Temporary Protection Directive was created in the aftermath of the Balkan wars of the 1990s, when large-scale displacement from Bosnia and Kosovo exposed the limitations of existing EU asylum mechanisms (Fink & Kader, 2023; Spehar, 2025b). The Directive was designed to provide a collective and harmonised legal protection framework for situations of “mass influx” that might otherwise overwhelm national asylum systems (Directive 2001/55/EC). Its core objectives are summarised in **Table 2** which outlines the Directive’s focus on immediate protection, solidarity among Member States, and the safeguarding of national asylum systems.

Table 2. Core objectives of the Temporary Protection Directive

Objective	Policy rationale
Provide immediate and temporary protection	Enable rapid access to legal residence and basic rights for persons fleeing armed conflict or endemic violence
Ensure a balance of efforts between Member States	Promote solidarity by sharing responsibility for reception and support across the EU
Prevent overburdening of national asylum systems	Avoid the collapse of individual asylum systems during simultaneous, large-scale arrivals

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The TPD grants beneficiaries a residence permit, valid for one year (renewable up to three years), together with the right to work and access to housing, education, healthcare, and social welfare to the extent provided by national legislation. Importantly, the TPD establishes a form of protection based on prima facie group recognition rather than individual asylum claims, enabling a rapid and low-bureaucracy response. Despite its potential utility, the directive remained dormant for more than two decades. Notably, it was not activated during earlier humanitarian crises, such as those of migration from Syria (2015 and onwards), and it was not seriously discussed as a potential instrument for managing those large-scale refugee arrivals. The TPD thus remained a latent but unused mechanism until 2022, when geopolitical and moral consensus around Ukraine finally triggered its application.

## 4.2. Activation of the TPD in 2022: unprecedented scale and coordination

The Russian Federation's full-scale invasion of Ukraine on 24 February 2022 triggered the largest and fastest displacement of people in Europe since the Second World War. Within weeks, millions of Ukrainians crossed into the European Union, prompting the need for an immediate and coordinated legal and humanitarian response. On 4 March 2022, the Council of the European Union adopted Council Implementing Decision (EU) 2022/382, thereby activating the Temporary Protection Directive for the first time since its adoption in 2001. This activation marked a watershed moment in EU asylum and migration governance and represented both a humanitarian act and a major test of European solidarity and multilevel coordination. At the same time, the decision embedded the EU's response to displacement firmly within a temporal logic of protection, framing residence and rights as explicitly time-limited. Temporality has become an increasingly important dimension of migration and asylum governance in recent years (Schultz & Vedsted-Hansen, 2025). Scholars describe a "temporary turn," where migration policies frame protection and mobility as time-bound, exceptional, and reversible. The TPD reflects and reinforces this logic: it guarantees safety and access to rights, but only within a limited temporal horizon. The directive thus institutionalises the notion of temporariness as a governing principle in EU migration policy (Hernes & Łukasiewicz, 2025; Koikkalainen et al. 2025).

As the following sections demonstrate, this time-bound framework has had far-reaching implications for policy design and implementation across housing, education, and labour market integration, shaping both institutional responses and the everyday experiences of Ukrainian FDPs.

Following activation, all EU Member States, along with associated countries such as Norway and Switzerland, became legally obliged to transpose the directive into national legislation. Unlike earlier migration crises, political consensus around the decision was exceptionally strong. This reflected broad public solidarity with Ukraine, rooted in geographical proximity, shared democratic values, and the perception of Ukrainians as “neighbours in need” (Spehar, 2025b). The practical implementation of the directive remained primarily the responsibility of national governments and, crucially, of regional and local authorities. This multilevel structure—EU coordination, national legislation, and local and regional execution—became the defining feature of the directive’s operationalisation. While the TPD established a shared legal baseline across the EU, its implementation has varied substantially among Member States (European Parliamentary Research Service, 2024; Eurofound, 2024; Hernes et al, 2023; Koikkalainen et al., 2025). These differences stem from several interrelated factors, including national administrative traditions, welfare regimes, political priorities, geographical proximity to Ukraine, and pre-existing migration governance systems.

To better illustrate the scope of national discretion embedded in the Temporary Protection Directive, Table 3 summarises the key policy dimensions in which Member States exercised autonomy when implementing the directive.

Table 3. Areas of national discretion in the implementation of the Temporary Protection Directive

Policy dimension	National-level discretion
Legal transposition	Choice of transposition mechanism, including new legislation, amendments to existing asylum laws, or executive decrees
Institutional responsibility	Designation of authorities responsible for registration, residence permits, and access to services

Table 3 Continued

Policy dimension	National-level discretion
Substantive rights and entitlements	Definition of the scope and form of welfare entitlements, housing support, and labour market access
Role of local authorities and civil society	Allocation of responsibilities to municipalities and civil society organisations in service delivery and integration support

### 4.3. TPD’s duration, extensions, and post-2027 uncertainty

Initially, the TPD was set to provide protection for one year, with the possibility of extending its duration. It was first extended automatically until March 2024 and subsequently prolonged to March 2025, 2026, and most recently to March 2027 through successive Council Implementing Decisions. These extensions reflect the persistence of the war and the continuing need for protection, but they also raise broader questions about the temporal boundaries of “temporary protection” (cf. Sandberg et.al, 2025). As the displacement of Ukrainians becomes protracted, the line between temporary and long-term protection is increasingly blurred. For many FDPs—particularly those now integrated into local labour markets, education systems, and communities—the prospect of return remains uncertain, even though Ukraine wants its citizens to come back (Romashchenko, 2025). At the same time, TPD, by design, provides no explicit pathway to permanent residence or long-term legal status once it expires. At the EU level, the European Commission’s 2025 Council Recommendation on the transition out of temporary protection calls for coordination of exit strategies, balancing “safe and voluntary return” with “continuity of legal stay” for those wishing to remain (Council of the European Union, 2025). However, national governments retain wide discretion over how to operationalise this transition. As evidenced in the six national reports (as Annexes 1–6 (CRs), few Member States have yet developed concrete post-2027 mechanisms, creating growing uncertainty for FDPs and for the institutions tasked with their support.



This uncertainty underscores a broader tension within the EU's governance of displacement: while the TPD demonstrated the Union's capacity for swift and unified action, it also institutionalised temporariness that may be increasingly misaligned with the realities of long-term displacement and integration.

## **4.4. Governance and multilevel implementation of TPD**

MAGnitude's important contribution to an understanding of how the TPD has been implemented is the multilevel governance (MLG) perspective. It is essential for analysing TPD's implementation across the European Union as the migration governance in the EU is characterised by the dispersion of authority across EU institutions, national governments, regional administrations, municipalities, and civil society organisations (Caponio and Jones-Correa, 2018). Rather than working through a hierarchical system, these actors operate through overlapping mandates, negotiated responsibilities, and shared implementation tasks (Hooghe and Marks, 2020). TPD, with its combination of EU-level activation, national-level legal transposition, and local-level service delivery, exemplifies the multi-governance structure.

## **4.5. Transposition and divergent national architectures**

All six countries examined in this report—Finland, Germany, Latvia, Lithuania, Poland, and Sweden—activated or transposed the TPD within days or weeks of the EU decision in March 2022. Yet the speed of activation masked significant institutional differences. Each country chose distinct pathways for embedding the directive into domestic legislation, reflecting pre-existing administrative traditions and welfare-state models.

Germany and Finland incorporated the directive into existing asylum and migration legislation, drawing on established governance frameworks with clear divisions of responsibility. Latvia and Poland enacted dedicated legislation specific to displaced Ukrainians, enabling rapid action but sometimes creating parallel systems that did not fully align with existing structures. Lithuania relied on a hybrid approach, combining amendments to its Law on the Legal Status of Foreigners with complementary government decisions. Sweden initially relied on its general asylum system before introducing differentiated residence statuses in 2024, which reshaped responsibilities for municipalities and the Migration Agency.

These national differences significantly shaped access to rights, the clarity of institutional mandates, and the stability of coordination mechanisms during implementation. While EU institutions offered strategic guidance and monitoring, national governments played the central role in defining access to services, funding allocation, and responsibility-sharing. The effectiveness of national coordination varied considerably across the six cases. Lithuania established a coordinated structure involving the Ministry of Interior, the Ministry of Social Security and Labour, and the Reception and Integration Agency (RIA). Latvia created a similarly clear framework through the State Fire and Rescue Service and municipal civil-protection commissions. Germany relied on federal-Länder coordination and existing welfare-state mechanisms, which ensured broad national coverage but produced regional variation in administrative capacity and service delivery. By contrast, Poland and Sweden experienced more fragmented national coordination. In Poland, the Special Act ensured rapid emergency response but left longer-term integration responsibilities unclear, resulting in municipalities, NGOs, and private actors taking on significant tasks without consistent guidance. In Sweden, ambiguities regarding the respective responsibilities of the Migration Agency, municipalities, and county administrations persisted until reforms in 2024 clarified the division of labour.

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## 4.6. Local-level implementation and municipalities as de facto integrators

Local implementation is especially important in migration and asylum governance because the practical realisation of protection, welfare access, and integration occurs at the municipal level (Lidén and Nyhlén, 2022). Even when national governments define policies, it is local authorities and frontline professionals—SLBs—who interpret and apply them in everyday encounters with migrants, often in collaboration or partnerships with CSOs (Schierenbeck, Naseef and Spehar, 2023). SLBs exercise considerable discretion in contexts with rapidly changing rules or limited resources, as was the case during the initial implementation of TPD. Their actions shape not only access to housing, education, and employment but also migrants' experiences of the state and their sense of belonging.

Across all six countries, municipalities became the primary implementers of TPD, regardless of how responsibilities were formalised at the national level. Municipalities provided accommodation, ensured access to schooling, facilitated labour market entry, and coordinated with civil society actors. In Lithuania, municipalities worked closely with RIA to manage housing and early integration. In Latvia, municipal commissions served as the central interface for displaced Ukrainians. In Germany, Finland and Sweden municipalities played well-established roles in welfare and education provision, but the scale of arrivals required intensified collaboration with NGOs and volunteers. Even in Poland—where municipalities had limited formal integration mandates—they became focal points for registration, social assistance, and support for families with children.

The centrality of local authorities thus underscores a key insight of multilevel governance: policy implementation depends as much on local capacity, coordination, and discretion as on national legislation.

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## 4.7. Civil society as a bridging and compensatory actor

Civil society organisations, volunteers, and Ukrainian diaspora groups played indispensable roles across all six countries for hosting and supporting Ukrainian FDPs, though the scope and form of their involvement varied according to governance structures and local capacities. In countries where state coordination was fragmented or where integration mandates were weakly defined—most notably Poland and, to some extent, Sweden—CSOs assumed a compensatory role, providing services such as language courses, psychosocial support, job-search assistance, and legal counselling. Here, NGOs often became the primary entry point into the support system, helping Ukrainian FDPs navigate administrative procedures and providing multilingual information that public institutions could not always offer.

In more coordinated governance environments, like Lithuania and Latvia, CSOs were embedded into municipal-level coordination mechanisms and acted as operational partners in delivering early integration support. NGOs collaborated with municipalities to organise temporary accommodation, distribute humanitarian aid, and reach vulnerable individuals, such as elderly persons or single mothers. EU emergency funding, particularly AMIF and EFS projects, enabled municipalities in both countries to contract NGOs for language training, orientation sessions, and counselling. Germany and Finland represent a third pattern, where strong welfare-state structures coexisted with targeted civil society involvement. Although municipalities bore the main responsibility for welfare and education, CSOs provided bridging support by helping FDPs navigate complex registration processes and access entitlements. For example, in Berlin NGOs deployed “integration guides” and language mediators, who assisted individuals at welfare offices, job centres, and schools. In Finland, CSOs played an important role in community-building activities and social support, particularly in rural areas with limited municipal resources.

Across these varied settings, CSOs enhanced responsiveness, offered person-centred support, and extended the capacity of local authorities. However, reliance on CSOs also led to uneven access to services, as the scope and quality of support depended on local NGO capacity, funding availability, and the strength of municipal–CSO cooperation.

## 4.8. Evolution of migration governance under the TPD over time from emergency response to stabilisation and recalibration

Implementation of the TPD evolved over time, reflecting processes of administrative learning, shifting political priorities, and changing resource needs. Across the six countries examined in this report, three broad phases of implementation can be identified, each characterised by distinct policy priorities. The initial phase prioritised rapid humanitarian response and access to protection, followed by a period focused on institutional stabilisation and integration into mainstream welfare, education, and labour market systems. More recently, implementation has entered a phase of recalibration or restriction, as displacement has become protracted and governments have sought to adjust temporary protection arrangements within existing policy frameworks. **Table 4** summarises this temporal evolution, highlighting the shift in policy priorities over time.

Table 4. Temporal evolution of the TPD implementation

Phase	Time period	Policy priorities	Implementation challenges
Emergency humanitarian response	2022	Rapid protection; emergency housing; access to basic rights	Limited capacity; strong reliance on ad hoc solutions and civil society
Institutional stabilisation	2023–2024	Integration into mainstream welfare, education, and labour market systems; formalised coordination	Uneven municipal capacity; coordination challenges
Normalisation or restriction	2025	Adjustment of entitlements; planning for post-2027 legal pathways	Tensions between temporary status and long-term settlement needs

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## 5. Main findings

Taken together, this temporal evolution illustrates that the implementation of the TPD has been dynamic rather than static, shaped by changing policy priorities, institutional learning, and shifting resource constraints. As emergency responses gradually gave way to more stabilised arrangements and, more recently, to recalibration or restriction, the implications of temporary protection have become increasingly visible in specific policy domains. The following sections therefore turn to a closer examination of how these governance dynamics have unfolded in three key policy areas that are central to FDPs' everyday lives and longer-term integration prospects: labour market integration, housing, and education.

### 5.1. Labour market integration

Access to the labour market is one of core entitlements under TPD. All six examined countries enabled Ukrainian FDPs to access the labour market. Given that the majority of those who arrived from Ukraine were of working age and highly qualified, most having a tertiary education and prior work experience, expectations for rapid labour market integration were high (IOM, 2024; Kubiciel-Lodzińska, et al. 2024; Kosyakova et.al, 2024; Schreyer 2024). However, the different countries' approaches to labour market integration have shaped FDPs' de facto access to employment.

In Finland, Ukrainian FDPs' access to the labour market was impeded by stringent requirements, including advanced language proficiency and formal qualifications equivalent to those of the local workforce. The difficult economic situation in Finland, along with a high unemployment rate in European comparison, further exacerbated FDP's chances for rapid employment. High demands regarding language skills and qualifications are similarly characteristic of the German labour market. Germany placed high expectations on the potential of highly qualified FDPs to address the existing skills shortage on the German labour market. Germany pursued a strategy of medium-term integration of Ukrainian FDPs into the labour market, emphasising language learning to enable employment in line with their qualifications.

However, at the end of 2023, the “Job Turbo” programme was introduced, marking a shift towards rapid integration and a tendency towards deskilling. Among the studied countries, Finland has the lowest employment rate of Ukrainian FDPs with 28 per cent (CR Finland, Annex 1) and marginal increases over time. In Germany the employment rate was comparably low but increased constantly. In May 2025, the employment rate was 34,3 percent ( Mediendienst Integration 2025).

Latvia and Lithuania both pursued rapid labour market integration and introduced comprehensive sets of measures. For instance, Latvia facilitated Ukrainian FDPs’ way into employment by introducing tax reliefs, and Lithuania introduced wage subsidies for employers. However, due to budget cuts, the Lithuanian approach is currently under question. The Polish labour market likewise provided favourable conditions for a rapid integration of Ukrainian FDPs. Poland has one of the most liberal labour markets in Europe. Moreover, labour migration from Ukraine to Poland has increased since 2014, and the existing Ukrainian diaspora is likely to have facilitated Ukrainian FDP’s chances of finding employment through informal networks. In Lithuania and Poland, the employment rate is among the highest, with 76,5 (Public Employment Agency/CR Lithuania, Annex 4) and 71,3 (CR Poland, Annex 5) per cent respectively. In Latvia, the employment rate is 56 per cent ( R Latvia, Annex 3). In Sweden, the employment rate of 58 per cent is remarkably high given that the state only offered fragmented support for Ukrainian FDPs until 2024 (IOM, 2024). While CSOs have partially compensated for the lack of state support in Sweden, conditions for Ukrainian FDPs improved significantly in 2024, when they were granted access to the labour integration programme (Etableringsprogrammet). Sweden is the only country where the legal status and economic situation among the Ukrainian FDPs has improved since 2022.

The outcomes of labour market integration across the six countries show that rapid integration carries a significant risk of deskilling. The country reports echo previous research and clearly indicate that rapid labour market integration is linked to taking up jobs below FDPs qualifications. In addition to clear deskilling tendencies, Ukrainian FDPs more frequently work in temporary jobs (ENM, 2024; IOM,2024; Kosyakova et. al., 2024; Lashchuk, 2025). Even though employment rates vary greatly across the countries studied, there are clear parallels in the factors that prevent Ukrainian FDPs from finding skilled work that matches their qualifications. These obstacles are discussed in the next section, along with examples of how countries have attempted to counteract them. The second section discusses specific labour activation measures.

## 5.1.1. Obstacles to labour market integration

### 5.1.1.1. Language skills

The predominant majority of Ukrainian FDPs arrived in the countries of the Baltic Sea region without the language skills of the respective countries. At the same time, all country reports indicate that knowledge of the local language is the key not only to the labour market but also to integration in a broader sense. There are exceptions for certain sectors, such as IT, and English proficiency has proven important in Sweden and Lithuania, as has Russian proficiency in Lithuania and Latvia.

In all countries, experts noted a lack of local language skills as a factor hindering rapid labour market integration, but there are also significant differences across the cases. Finland and Germany have exceptionally high requirements for language acquisition. According to the interviewed experts, in both Finland and Germany, language proficiency in the respective country is required even when they are not essential for performing the respective job. However, language skills of Ukrainian FDPs in Finland have increased significantly, and they have also improved in Germany (CR Finland Annex 1, CR Germany Annex 2).

In Poland, likewise, language skills are essential for pursuing specialized professions. In Germany, Ukrainians under the TPD can be granted entitlement to attend integration courses, including language courses and civic training. Ukrainian FDPs, receiving social benefits, are obliged to attend an integration course. However, legal changes and budget cuts have recently significantly reduced opportunities to improve language skills beyond the A2/B1 level offered in integration courses.

Lithuania and Latvia have made deliberate efforts to remove the existing language barrier to employment by temporarily waiving the language proficiency requirement that normally applies. In Lithuania, foreign nationals are normally required to obtain a Lithuanian language certificate after 12 months. This requirement has been waived for Ukrainian FDPs for as long as they are granted the TPD status (Alfa 2025). Latvia has allowed Ukrainians to be hired without any language skills. Still, challenges remain in these countries for Ukrainian FDPs seeking higher-qualified positions, which necessarily require strong language skills, regardless of the regulations.



Despite the need to learn the language, however, several country reports indicate a lack of availability of language courses. In Lithuania, various institutions and CSOs offer language courses, but the number is insufficient given the high number of FDPs. In Latvia, there is a lack of consistent and continuous language practice, which is also due to a funding gap. As a result, Ukrainian FDPs have to wait several months for a new language course after completing one level. The Polish country report paints a mixed picture: on the one hand, the organisation of language course by CSOs is constrained by temporary financial support and FDPs' one-time eligibility for participation. On the other hand, the interviewed experts note the reluctance of some Ukrainian FDPs to invest in learning the Polish language. In Sweden, Ukrainian FDPs were only granted access to state-subsidised language courses after two years, following a change in their legal status. Until then, civil society organisations and courses initiated by Swedish volunteers were filling the gap in language provision.

#### **5.1.1.2. Gender barriers**

The country reports echoes research pointing to insufficient childcare facilities as a factor hindering female Ukrainian FDPs' labour market integration (Lashchuk 2025; Nowicka et. al., 2025). Experts in Lithuania, Latvia, Germany and Poland explicitly refer to the care responsibilities of Ukrainian FDPs, who are often de facto single mothers, as an obstacle to taking up employment. Even when the children are in kindergarten, a lack of social networks limits women's employment possibilities as they can only work from 8 a.m. to 4 p.m, as one of the experts in Poland notes.

In addition to the lack of sufficient childcare opportunities, there are also other gender dimensions in the patterns of job entry of Ukrainian FDPs. In several countries under analysis, women and men from Ukraine continue to work in typical gendered occupations, such as care, retail, and services for women, and construction and logistics for men. In Poland, where many Ukrainian men used to work before 2022, a lack of men working in typical masculine jobs, such as construction and Transport-Logistics, appeared, with minor attempts to include Ukrainian women in these spheres.

### **5.1.2. Measures for labour market integration**

In most of the studied countries, state or municipal institutions offer support in labour market integration. However, informal networks such as personal contacts or social media are mentioned as more crucial to find employment, for example, in Poland and Germany.

In Sweden, CSOs attempted to compensate for the lack of access to the state labour integration programmes for FDPs before 2024 by running EFS financed projects. They pursued a hands-on approach, bringing FDPs and employers together and working on specific issues such as CVs and presentations on the Swedish job market. This approach, which was considered effective in Sweden, was also pursued by CSOs in Germany. Lithuania has introduced monetary support for Ukrainian FDPs by financing occupational training and by subsidising wages as incentives for employers to hire Ukrainian FDPs. However, these subsidies are currently endangered by budget cuts. Latvia introduced a one-off employment or self-employment allowance for Ukrainian FDPs.

## 5.2. Housing

Providing Ukrainian FDPs with decent accommodation posed a major challenge for the state and civil society actors in the six countries examined in this report. During the first months after Russia's full-scale invasion, responses in Poland, Lithuania, Latvia, Germany, and—to a lesser extent—Finland were marked by improvised, rapidly assembled arrangements. The scale and speed of arrivals required extensive mobilisation not only of national and municipal authorities, but also of CSOs and private citizens. Sweden stands out as a country that was comparatively less strained by the challenge of housing Ukrainian FDPs. Partly, it received a lower number of arrivals than its Nordic neighbours and already had established systems of collective accommodation for protection seekers since 2015, supplemented by municipal housing resources.

In all countries except Sweden, the provision of private accommodation by ordinary citizens played a significant role in increasing housing facilities for Ukrainian FDPs. The broad willingness of receiving societies to host Ukrainian FDPs at such a large scale constitutes a new form of civic engagement in the context of forced migration governance (Haller et al. 2022; Haase et. al. 2024). Early on, potential hosts waited directly at the main railway and bus stations to meet Ukrainian FDPs. Later, the matching of private hosts and guests was often mediated through the digital platforms. CSOs were the main actors developing these platforms, sometimes with the support from local municipalities, the state and church institutions.

These platforms also aimed at reducing potential risks related to private hosting, such as exploitation and sexual assaults, the latter being particularly important due to the predominantly female composition of Ukrainian FDPs. In Lithuania, the developed platform later streamlined the provision of municipal accommodation.

Initially, most hosts did not charge any rent for Ukrainian FDPs. In Lithuania, Poland, and Latvia, the states provided financial support to private individuals, who hosted protection-seekers from Ukraine. In Latvia, the reimbursement was paid during the first month, while Lithuanian citizens could apply for reimbursement until the end of 2023. The reimbursement for Polish citizens lasted the longest until June 2024, echoing the crucial role of activating additional accommodation facilities through private hosts.

Temporary shelter was also provided in collective accommodations. In Finland, Germany and for a short period of time, Sweden, preexisting collective refugee accommodations were activated to shelter Ukrainian FDPs. Lithuania, Latvia and Poland lacked such facilities and had to find alternative solutions. Accordingly, in Lithuania and Poland, the first months after Russia's full-scale invasion were characterised by emergency solutions, involving several actors such as CSOs, religious organisations (in Poland), before the states and municipalities stepped in.

Despite relatively good coverage of housing solutions, the quality of collective accommodation and state support for Ukrainian FDPs in finding accommodation varied significantly across the countries. In Finland, only a small share of Ukrainian FDPs were accommodated in reception centres for protection-seekers, while the majority was provided with flats in municipalities. Accordingly, FDPs were offered significantly better conditions than other protection seekers, who were usually placed in reception centres located in rural areas with poor infrastructure and no contact with Finnish society. In Germany, a majority of 83 per cent were living in private accommodation at the end of 2023 (CR Germany, Annex 2). The remaining share of Ukrainian FDPs lived in collective refugee accommodation distributed equally across the country. As the responsibility for housing in Germany lies with the federal states and municipalities, the quality and type of accommodation vary. However, research shows that refugee housing in Germany predominantly has bad infrastructure, lacks privacy and hygiene and has poor quality of food (Vey, 2023).

The interviewed experts mentioned the former airport Tegel in Berlin as a deterrent example of inhumane conditions in such accommodations. Ukrainian FDPs in Germany therefore had a strong motivation to find private accommodation.

In Lithuania, the Special Reception and Integration Agency (RIA) provided dormitory-type collective accommodation to Ukrainian FDPs. Experts report that Ukrainian FDPs in Lithuania have been reluctant to move out of such accommodation because of difficulties in finding accommodation through the rental market. RIA developed an elaborate system of providing accommodation to different groups. For instance, priority was given to mothers with small children with a work contract, elderly people and people coming to Lithuania for specialised medical treatment. Another difference to Germany is that accommodation in public collective accommodation was free of charge for Ukrainian FDPs. In Germany, in contrast, collective accommodation is often expensive, including obligatory payment for the provided food.

In Latvia, various actors coordinated effectively in providing collective housing. Hotels and guesthouses provided housing opportunities and were compensated by the government. However, such facilities decreased over time. While there are no insights into the concrete conditions in collective facilities, the Latvian report indicates that Ukrainian FDPs had better access to information and local society, as well as better health conditions. Swedish experts echoed that collective housing could foster contact with authorities, while living alone could exacerbate loneliness. On a different note, the report emphasises that collective accommodation limits contact with Swedish society, which hinders integration (CR Sweden, Annex 6 ). At the same time, Sweden stands out as the country facing the fewest challenges in providing decent housing for Ukrainian FDPs, although the quality of housing varies across municipalities. In addition to receiving the lowest number of Ukrainian FDPs among the six studied countries, the Swedish housing regime is characterised by a significant share of state and municipality-owned housing. Accordingly, Ukrainian FDPs received the most significant municipal support in finding housing in Sweden for free or at low costs through existing allocation systems. In bigger cities, public facilities were repurposed for Ukrainian FDPs. One notable example is the co-management of a repurposed public facility by the municipality and CSOs. In Sweden, Ukrainian FDPs were accommodated in “refugee centres” and “asylum units” only until May 2022 and subsequently evenly distributed across the country.

Approximately 40 per cent found independent housing, reinforcing the centrality of municipal housing (CR Sweden, Annex 6). In Poland, the share of Ukrainian FDPs living independently is significantly higher, with 61 per cent. Due to the lack of specialised housing programmes for Ukrainian FDPs, they were dependent on the free rental market (CR Poland, Annex 5).

The importance of emergency responses decreased over time, not only among the private hosts but also among temporary shelters of collective accommodation. Crucially, in all six examined countries, Ukrainian FDPs could choose freely where to live and, unlike other protection seekers, did not depend on reception centres.

### 5.2.1. Obstacles and opportunities in housing and living conditions

The challenges Ukrainian FDPs face on the rental market are quite similar across the cases. High rental prices and a lack of housing capacity are particularly impeding Ukrainians' ability to find affordable housing in larger cities (Haase et al., 2024). Ukrainian FDPs' income or social benefits are mostly insufficient to cover high housing costs. On a more positive note, most countries pay a housing allowance. In Latvia, a housing allowance was paid in the first month for all Ukrainian FDPs. In Finland, Ukrainian FDPs receive a housing allowance after getting a municipality of residence. However, the allowance is too low to cover costs in larger cities. In Poland and Lithuania, FDPs are likewise eligible for a housing allowance. In Germany, recipients of the citizens' benefit receive a housing allowance within a predetermined limit.

All in all, the country reports suggest that Ukrainian FDPs' living conditions have stabilised. It should be emphasised, that a minority of Ukrainian FDPs are forced to live in low-quality collective accommodation. In Lithuania, data from the civic initiative "Strong together" indicate decent living conditions of Ukrainian FDPs, as do reports by Polish experts. A survey conducted amongst FDPs in Germany at the end of 2023 shows that an overwhelming majority of FDPs state satisfaction with their accommodation (CR Germany, Annex 2).

Beyond these insights, there is little systematic evidence or research on Ukrainian FDPs' living conditions in the six examined countries. In Lithuania, Poland, and Finland, there are some indications of discrimination against FDPs on the rental market.

For Ukrainian protection-seekers in Lithuania, it can be challenging to obtain an official rental contract, which rules out FDP's ability to receive a housing allowance. Landlords in Finland, in some instances, exploit Ukrainian FDPs' misery by issuing unofficial or precarious contracts. Research on the trajectories of Ukrainian FDPs in Poland also documents landlords' discriminatory behaviour towards FDPs. It is also worth noting that in Poland, Finland and Germany, experts report that Ukrainian FDPs live with several families or multiple generations in one flat to share the cost of high rent, or, in Germany, avoid living in a collective accommodation.

## 5.3. Education

Access to education has been central to stabilising the lives of Ukrainian children and adults across the six countries examined in this report. While all countries guaranteed legal access to schooling within the national compulsory education system, the scope, speed, and quality of educational provision varied substantially depending on governance structures, municipal capacity, and school-level practices. Experts across several countries highlighted that many young Ukrainian FDPs face difficulties adapting to displacement and often struggle to develop a sense of belonging in their schools. The temporariness of their protection plays an important role, as it delays long-term educational decisions and affects social integration, including their ability to build relationships outside specific preparatory or welcome classes. Adult FDPs face different challenges related to language acquisition, recognition of qualifications, balancing work with study, and limited access to state-supported adult education programmes.

### 5.3.1. Governance patterns and systemic barriers

Across the six countries, education for Ukrainian FDPs has been shaped by multilevel governance structures in which national legislation defines entitlements, but municipalities and schools carry primary responsibility for implementation. Despite substantial variation in administrative systems, the national reports reveal a number of common governance patterns and structural barriers. In Finland, Germany, and Sweden, municipalities function as the key organisers of compulsory school education for children, responsible for school placement, staffing decisions, and support measures within nationally defined frameworks.

In Lithuania and Latvia, national ministries issue central guidelines but delegate day-to-day implementation to municipalities and individual schools, creating a similar localised dynamic within more centralised welfare regimes. Poland's Special Act ensured universal access to education for Ukrainian children, yet the practical organisation of school admission and support was left primarily to municipalities and school directors, in a context where no coherent national integration strategy was established.

The comparative analysis shows that local capacity emerged as one of the most significant constraints across the six countries. Municipalities reported shortages of teachers, Ukrainian-language specialists, school psychologists, and special-needs staff, combined with pressure on physical infrastructure. In Germany, district-level authorities highlighted the strain caused by rapid enrolment and large numbers of newly arrived pupils, which exceeded existing support resources. In Poland, schools faced difficulties absorbing large numbers of Ukrainian pupils due to pre-existing staff shortages and limited classroom space. Lithuanian schools reported similar challenges, especially regarding Lithuanian-language learning support and limited dedicated resources for language acquisition. Even in Finland and Sweden, the sudden increase in pupil numbers required municipalities to reorganise staffing and expand preparatory or transitional classes.

Another cross-cutting feature was the central role of school-level discretion. Decisions about whether pupils should enter mainstream classes directly, be placed in preparatory or language-support groups, or receive psychosocial assistance were largely determined by individual school principals or municipal coordinators. In Germany's welcome classes, school-level actors determined not only placement but also the degree of integration into regular instruction, leading to substantial variation across districts. In Lithuania, headteachers similarly exercised discretion in adapting school practices to accommodate Ukrainian pupils, including those attending Russian-language schools. In Poland, school directors implemented the Special Act's provisions unevenly depending on local resources and existing practices. This discretionary space enabled flexible, context-sensitive solutions but also contributed to unequal access to support both within and between countries.

Finally, temporality emerged as a key systemic barrier across all contexts. The uncertainty surrounding the duration of temporary protection influenced both school planning and family behaviour.

The German report emphasises how the temporariness of protection shapes the experiences of Ukrainian youth, many of whom struggle with belonging and hesitate to make long-term educational decisions while hoping to return to Ukraine. Similar dynamics are noted in Poland, where some parents perceived their stay as temporary and therefore deprioritised long-term educational engagement. For adults, temporality affected participation in language courses or vocational training, as individuals were reluctant to invest in lengthy programmes amid uncertain prospects. Municipalities in several countries also highlighted difficulties, designing sustainable support measures when pupil turnover remained unpredictable.

Civil society organisations played an essential role across countries in filling gaps in adult education—especially language training. In Sweden and Poland, CSOs provided the primary source of language instruction during the first years. In Latvia and Lithuania, CSOs delivered municipal-funded courses, particularly for adults with caregiving obligations or limited digital skills. In all cases, CSOs also offered orientation sessions, job-search assistance, legal counselling, and peer-support groups. However, reliance on CSOs also produced variation in access between municipalities, as provision depended on organisational capacity and external funding cycles.

Together, these governance patterns illustrate how a shared EU-level entitlement translated into diverse national and local realities. While all six countries ensured legal access to schooling, differences in administrative structures, municipal capacity, and school-level discretion produced highly uneven educational environments for Ukrainian FDPs. The interaction between multilevel governance arrangements and temporal uncertainty shaped not only institutional responses but also the everyday educational trajectories of Ukrainian children and adults.

### 5.3.2. Children's education

All six countries provided Ukrainian children with access to primary education, but the ways in which education was organised for this group diverged significantly. Three broad organisational models emerged. Germany and Latvia relied heavily on preparatory or transitional classes, which offered intensive language training but at times resulted in social segregation and slower integration into mainstream education (CR Germany, Annex 2; CR Latvia, Annex 3). Finland, Poland, and Sweden more frequently adopted direct integration into mainstream classrooms.



Such strategy allowed for age-appropriate class placement, combined with additional language instruction, although the capacity to provide adequate support varied across municipalities. Lithuania used a hybrid model, combining preparatory instruction with gradual integration based on local capacity and student needs (CR Finland Annex 1; CR Lithuania Annex 4; CR Poland Annex 5; CR Sweden Annex 6)

In general, schools exercised significant autonomy in decisions regarding grouping, support, and the pace of integration. In Poland, only 2.4 per cent of pupils from Ukraine attended preparatory classes. In Finland, municipalities decided whether students received targeted preparatory teaching or support within mainstream classrooms. In Sweden, temporary measures such as interim study groups emerged in some municipalities during delays in formal placement. The German report indicates that many adolescents, particularly those placed in segregated preparatory classes, reported limited interaction with local peers, contributing to weak feelings of school belonging. In all countries studied, the temporality of the TPD protection discouraged long-term educational planning, with some students uncertain whether they should pursue host-country educational pathways or maintain ties to Ukrainian curricula. Teachers across several countries reported that students experienced anxiety related to separation from family members, war-related trauma, and the disruption of their educational trajectories (Petäjäniemi et. al., 2024).

Psychosocial support was a recurring challenge. Latvia, Lithuania, and Poland emphasised shortages of school psychologists and social workers, which limited the ability to respond to trauma-related needs. Teacher shortages, especially in language instruction, were reported in Finland, Sweden, and parts of Germany. As a result, schools frequently relied on Ukrainian-speaking assistants, volunteers, or CSO-provided mediators to support communication and classroom management.

### **5.3.3. Adult education: language learning, and access to tertiary studies**

Adult Ukrainian FDPs faced a more uneven landscape of educational opportunities than children. Although all countries formally allowed participation in adult education, access in practice was shaped by municipal capacity, temporary legal status, language requirements, and the role of civil society organisations. Access to language learning differed considerably across countries.

In Finland and Germany, (CR Finland Annex 1; CR Germany Annex 2) adults could participate in municipal or publicly organised language courses, but demand frequently exceeded available places, and participation was often hindered by childcare or employment obligations. The Finnish report notes that many adults enrolled in vocational programmes or the TUVA preparatory track, which is designed for individuals who do not hold a secondary qualification (upper secondary school or vocational education) but wish to obtain one. This choice was partly driven by the fact that recognition of Ukrainian degrees is slow, costly, and administratively demanding, prompting even highly educated adults to restart education at lower levels. (CR: Finland Annex 1)

In Latvia and Lithuania, municipalities and CSOs worked together to expand language provision, although the Latvian report highlights that courses were often project-based and lacked continuity. Lithuania offered state-funded adult education and vocational training, but limited availability of Lithuanian-language instruction constrained participation. (CR Latvia Annex 3; CR Lithuania Annex 4). The Polish report shows that state-funded language learning for adults was largely absent, leaving NGOs, churches, and diaspora organisations as the main providers of Polish-language courses. ESF-funded vocational courses and work-placement schemes supported some adults, but access varied by region. In Sweden, access to municipal adult education depended on legal status: adults without municipal registration were initially excluded from formal language programmes and relied heavily on CSO-run courses until eligibility expanded in 2023–2024. (CR Poland Annex 5; CR Sweden Annex 6).

Across all countries, adults faced similar barriers to participation. Temporary protection discouraged investment in multi-year programmes, as many were unsure how long they would remain in the host country. Caregiving responsibilities, especially for women, limited the time available for study. Recognition and validation of qualifications was a major challenge. Due to the lack of adequate retraining opportunities to align Ukrainian qualifications with those in the receiving countries, FDPs often have to obtain an entirely new degree or complete an apprenticeship. However, completing an apprenticeship or degree requires a long-term investment, which FDPs are often reluctant to make due to their temporary residence permits. In Finland, Germany, and Lithuania, lengthy and complicated procedures for recognising Ukrainian FDPs' qualifications impede their labour market integration (CR Finland Annex 1; CR Germany Annex 2; CR Lithuania Annex 4).

In Finland, many adults abandoned recognition efforts because procedures were expensive and slow, while in Poland, cumbersome validation processes constrained access to vocational or higher education pathways (CR Poland Annex 5). Participation in higher education was formally possible in most countries but practically limited. In Sweden, tuition-free university access did not translate into enrolment due to language requirements, credential verification, and ineligibility for student financial aid until 2026 (CR Sweden, Annex 6). Finland reported only a small number of Ukrainian students in universities in 2024, while thousands enrolled in vocational tracks, reflecting linguistic and recognition barriers. In Lithuania and Latvia, Ukrainian adults could apply for state-funded study places, yet limited language preparation restricted entry into both vocational and tertiary education. In Poland, universities allow Ukrainian FDPs to enroll even without full documentation, but participation still depends on completing Polish-language training and navigating recognition procedures. (CR Lithuania Annex 4; CR Latvia, Annex 3; CR Poland Annex 5)

Civil society organisations have once again played an essential role in filling the gaps in educational field, especially in Poland and Sweden, where early state provision for education was limited. CSOs offered language courses, orientation sessions, job-search support, and legal counselling. In Latvia and Lithuania, CSOs cooperated with municipalities to provide more flexible training formats. Yet reliance on CSOs resulted in uneven access, as availability depended on local organisational capacity and short-term project funding. Overall, adult education across the region was characterised by formal access but limited participation. Language demands, administrative requirements, financial constraints, and the uncertain temporal horizon of temporary protection all shaped the educational trajectories of Ukrainian adults, reinforcing inequalities between municipalities and across countries. ( CR Poland Annex 5; CR Sweden Annex 6; CR Latvia Annex 3, CR Lithuania Annex 4)

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# Conclusion

This comparative report analysed how six EU countries—Finland, Germany, Latvia, Lithuania, Poland, and Sweden (CR Finland, Annex 1; CR Germany, Annex 2; CR Latvia, Annex 3; CR Lithuania, Annex 4; CR Poland, Annex 5; CR Sweden, Annex 6)—implemented the Temporary Protection Directive (TPD) in response to the arrival of forcibly displaced persons (FDPs) from Ukraine following Russia’s full-scale invasion in February 2022. The directive provided an immediate and harmonised legal framework, yet its translation into national policies and local practices resulted in markedly divergent outcomes. These differences reflect broader variations in welfare-state and migrant integration models, administrative capacities, housing markets, labour market structures, and educational systems. Germany and Finland relied on long-standing welfare-state and migrant integration infrastructures. By contrast, Sweden—despite having well-developed refugee reception infrastructure and receiving far fewer FDPs—developed a fragmented and ad hoc response characterised by repeated legal changes and unequal rights among Ukrainian FDPs. Lithuania demonstrated strong coordination among national and municipal actors despite its smaller administrative system, whereas Poland faced ambiguous division of responsibilities between national and local authorities, hindering the development of coherent integration measures.

Across all countries, local municipalities emerged as central implementation actors. They provided accommodation, managed school placement, facilitated labour market access, and cooperated with civil society organisations (CSOs). CSOs played important roles everywhere, although their involvement differed considerably. In Germany, Finland, Latvia, and Lithuania, they complemented municipal systems by offering specialised or bridging support. In Sweden and Poland, they compensated for gaps in state provision, particularly in areas such as language training, psychosocial support, and assistance with administrative procedures.

Despite divergent legal and institutional frameworks, Ukrainian FDPs faced similar challenges in all three focus areas - labour market integration, housing and education. Labour market integration was significantly constrained by language barriers, insufficient recognition of qualifications, and a lack of targeted training programmes. High employment rates in Poland, Lithuania and Sweden were accompanied by significant de-skilling.

Women with care responsibilities faced particular obstacles due to limited access to childcare and the need to prioritise their children's schooling and wellbeing. Housing shortages—especially in large cities—posed major barriers to securing adequate accommodation. For young FDPs, the uncertainty generated by temporary protection was especially destabilising. Adolescents faced dilemmas about educational pathways, unsure whether to commit to integration in the host country or retain ties to the Ukrainian system. Adults similarly hesitated to invest in long-term education or requalification programmes, given the unclear future of TPD. In some contexts, complex bureaucratic processes strained trust in state institutions and hindered FDPs' engagement with available services.

Nonetheless, the report identified several good practices. They include personalised coaching and job-matching programmes in Sweden and Germany; employer incentives introduced in Lithuania; and improved procedures for recognising qualifications in Latvia and Poland in key sectors, such as healthcare and education. Such practices demonstrate the value of tailored, person-centred support, closer cooperation between municipalities and CSOs, and targeted interventions that respond to specific local needs.

## 6.1. Policy Recommendation

In light of the impending end of TPD, the policy recommendations below follow from the comparative findings of the country reports as well as ongoing research in the project. They aim at improving both the current implementation of the TPD and long-term preparedness for possible future displacement scenarios.

On the EU level, coordinated guidance on post-TPD transition should be provided, enabling Member States to balance voluntary return with stable residence options for those, who intend to remain in host countries. Strengthening minimum standards for access to labour market measures, education, and decent housing would reduce inequalities observed across Member States. Multi-annual, flexible funding through instruments such as AMIF and ESF+ should be expanded to support municipalities and CSOs, which are the primary implementers of reception and integration measures.

On a national level, national governments should clarify mandates and improve cooperation among ministries, migration agencies, and municipalities. Predictable, need-based funding formulas would enable municipalities to plan beyond emergency cycles. Expanding and strengthening language-learning provision and simplifying qualification recognition procedures – especially in shortage occupations – are essential to reducing de-skilling. Policies should invest in childcare and flexible training options to support women with care responsibilities. National education authorities should offer clearer guidance for school integration of Ukrainian children and youth to reduce disparities across municipalities. In the housing sector, governments should support municipalities with targeted funding for increasing the availability of affordable and decent housing.

Municipalities should formalise partnerships with CSOs to ensure continuity of services and avoid overreliance on short-term projects. Investment in training for street-level bureaucrats – especially in trauma-informed approaches and intercultural communication – would strengthen frontline capacity. Improved information provision and coordinated case management across employment, housing and education services would reduce administrative burdens for Ukrainian FDPs. Municipalities should also expand psychosocial support, including school-based counselling, to address the stress and uncertainty experienced by both children and adults.

Uncertainty about future legal status remains a structural barrier. Clear policy guidance should reduce this uncertainty where possible, acknowledging that many Ukrainian FDPs will wish to remain for the medium term, even as return remains an option for others. Targeted requalification and job-matching programmes are needed to prevent de-skilling and foster upward mobility. Vulnerable groups – including single parents, elderly, persons with disabilities, and youth transitioning into adulthood – require tailored support. Finally, improved statistical data collection on housing, employment, and educational outcomes across the EU is essential to monitor evolving needs and support evidence-based policymaking.

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