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Alternatives to providing housing in-kind for applicants for international protection

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Explanatory note

This inform was prepared on the basis of national contributions from 24 EMN NCPs (AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, NL, PL, SE, SI, SK, and NO, RS) collected via an AHQ developed by the EMN NCPs to ensure, to the extent possible, comparability. The information contained in this inform refers to the situation in the abovementioned EMN Member and Observer Countries up to October 2025. Additional information from Ireland from November 2025 was included in footnote 17, given its relevance to the discussion.

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1. KEY POINTS TO NOTE

- Five European Migration Network (EMN) Member Countries reported implementing financial allowances as alternatives to in-kind housing during the reporting period (January 2020 to October 2025).¹ These were used either as a continuous component of the reception system or as a contingency measure during periods of high pressure on reception centres. Germany reported using financial allowances to cover housing in exceptional cases, depending on individual needs and subject to the discretion of federal states.
- In EMN Member and Observer Countries providing financial allowances as alternatives to in-kind housing, eligibility was often linked to administrative requirements (e.g. formally accepting the reception offer), vulnerability assessments, or reception capacity constraints.
- Two distinct approaches were identified in determining the amount of financial allowances to cover housing: nationally fixed-rate systems and locally determined rates.
- All EMN Member and Observer Countries implementing alternatives to in-kind housing also reported systems to ensure that applicants have access to essential services such as legal support, psychological assistance, and healthcare.
- The majority of EMN Member Countries enable applicants to access mainstream public services available to their nationals or residents, or provide these services via reception centres, regardless of housing arrangements. Poland has developed specific mechanisms to provide services to applicants living outside reception centres.
- EMN Member and Observer Countries with alternatives to in-kind housing schemes reported specific measures to support applicants with special reception needs. Unaccompanied minors were expressly excluded from alternative to in-kind housing schemes in the majority of cases.
- Austria, France and Poland reported mechanisms to monitor applicants for international protection in alternatives to in-kind housing. Although not necessarily specific to applicants in private housing arrangements, they can provide oversight and ensure assessment of ongoing eligibility for financial allowances to cover housing. Cyprus and Ireland rely on applicants' obligations to keep up-to-date records, while local authorities in Germany track applicants in alternative to in-kind housing schemes.



2. INTRODUCTION

Directive 2013/33/EU (recast Reception Conditions Directive 2013)² sets out standards for the reception of applicants for international protection in European Union (EU) Member States. It defines reception conditions as “the full set of measures that Member States grant to applicants”, including material reception conditions such as housing. It also sets out the possibility of providing such material reception conditions “in-kind, or as financial allowances or in vouchers, or a combination of the three, and a daily expenses allowance”.

Where Member States opt to provide material reception conditions (such as housing) in the form of financial allowances or vouchers, the recast Reception Conditions Directive 2013 provides further detail on determining the level to ensure an adequate standard. It states that “Where Member States provide material reception conditions in the form of financial allowances or vouchers, the amount thereof shall be determined on the basis of the level(s) established by the Member State concerned either by law or by practice to ensure adequate standards of living for nationals”. It also allows Member States to “grant less favourable treatment to applicants compared with nationals in this respect, in particular where material support is partially provided in-kind or where those level(s), applied

for nationals, aim to ensure a standard of living higher than that prescribed for applicants under this Directive”.³

In case C-79/13, the Court of Justice of the European Union (CJEU) ruled⁴ that if a Member State has opted to grant material reception conditions in the form of financial allowances or vouchers, those allowances must be sufficient to enable applicants to secure housing. However, even where allowances are sufficient, applicants may face other difficulties in accessing housing, such as administrative hurdles or the unwillingness of owners to rent to them.

In many EMN Member and Observer Countries, in-kind housing, such as accommodation centres or other reception structures, often serves not only as shelter but as a mechanism to deliver other elements of reception conditions and the Common European Asylum System (CEAS). When housing is not provided in-kind, EU Member States need to find alternative ways to fulfil their obligations under the recast Reception Conditions Directive 2013. This challenge may also arise when housing is provided in-kind through decentralised arrangements, such as private houses, flats, hotels or other premises adapted to housing applicants.

The Pact on Migration and Asylum (the Pact)⁵ offers a framework for improving the management of asylum

¹ Note for the reader: The key points/executive summary section provides a summary of the main information contained in the inform or study. For ease of reading, key points do not contain footnotes. Please note that EMN Member and Observer Countries referred to in the key points or executive summary are listed in the relevant sections within the current document.

² Directive 2013/33/EU of the European Parliament and of the Council of 26 June 2013 laying down standards for the reception of applicants for international protection (recast), accessed 28 November 2025.

³ Recast Reception Conditions Directive 2013, Article 17(5).

⁴ Judgment of the Court (Fourth Chamber) of 27 February 2014, accessed 28 November 2025.

⁵ European Commission, Migration and Home Affairs, Pact on Migration and Asylum, May 2024, accessed 23 January 2026.

procedures and reducing secondary movements of applicants, including a new framework to organise the reception of applicants for international protection. Directive (EU) 2024/1346 (recast Reception Conditions Directive 2024)⁶ sets out standards for the reception of applicants to harmonise those standards across the Member States and ensure adequate living conditions for applicants for international protection. It specifies that material reception conditions must enable an “adequate standard of living for applicants which guarantees their subsistence, protects their physical and mental health and respects their rights under the charter”.⁷

The European Commission Action Plan on Integration and Inclusion (2021–2027)⁸ stresses the importance of supporting applicants’ autonomy and self-sufficiency through housing measures that provide more flexibility and dignity than conventional collective housing, with the goal of fostering early integration and reducing dependence on state support. This is especially significant for families and individuals likely to be granted protection.

This inform explores whether EMN Member and Observer Countries used alternatives to providing in-kind housing between 2020–2025⁹ to applicants for international protection, while respecting their legal obligations and

supporting applicants’ autonomy, addressing their vulnerability, and promoting their integration into society. It aims to identify and highlight innovative solutions that meet the requirements set in the recast Reception Conditions Directive 2013 for EMN Member Countries as well as similar solutions that can be found in EMN Observer Countries.

Here, in-kind housing refers to the physical accommodation that a person or household receives as part of government assistance. Alternatives to in-kind housing are understood as reception measures provided by the state or mandated authorities through financial allowances or vouchers that do not involve the direct provision of physical accommodation but still ensure adequate housing and living conditions for applicants for international protection, in line with EU standards. The inform focuses exclusively on measures targeting applicants for international protection and does not address initiatives implemented specifically for beneficiaries of temporary protection (BoTP) or resettled refugees.

This inform was prepared based on contributions from 22 EMN Member Countries,¹⁰ Norway and Serbia, and complements previous EMN research on access to autonomous housing arrangements for applicants for international protection.¹¹



3. ALTERNATIVES TO IN-KIND HOUSING

Five responding EMN Member Countries reported using a **financial allowance as an alternative to in-kind accommodation** at reception centres during the reporting period (January 2020 to October 2025).¹² Germany noted that financial allowances to cover housing are used by some of its federal states in exceptional cases. The remaining EMN Member and Observer Countries did not report implementing an alternative to in-kind housing for applicants for international protection.

Austria and Poland use a financial allowance as an alternative to in-kind housing as a continuous component of their reception system. In Austria, applicants for international protection are either accommodated at centralised facilities or receive a monthly sum to help finance private accommodation as part of a package covering their basic care.¹³ In Poland, in addition to the option of staying in reception centres, asylum applicants can receive a cash benefit to cover the cost of private accommodation.

The three remaining EMN member countries¹⁴ use financial allowance schemes as an alternative to in-kind housing when their reception capacity faces particular pressure. In France, when asylum seekers need accommodation and do not have access to free housing arrangements due to the capacity constraints of the national reception system, the amount allocated for asylum seeker accommodation (*Allocation pour demandeurs d’asile, ADA*)¹⁵ is increased by an additional daily sum to enable applicants to find housing on their own.¹⁶ Similarly, Cyprus reported providing financial allowances to cover the rent of private accommodation and other basic needs through its social welfare services when reception centres do not have available accommodation.

In Ireland, financial allowance schemes as an alternative to in-kind housing were initially used when their reception capacity faced particular pressure. Following an acute housing shortage in the International Protection Accommodation Service (IPAS) in 2023, an increase of the daily expense allowance was provided to those applicants IPAS

6 Directive (EU) 2024/1346 of the European Parliament and of the Council of 14 May 2024 laying down standards for the reception of applicants for international protection (recast), accessed 23 January 2026.

7 Recast Reception Conditions Directive 2024, Article 19(2).

8 European Commission, *Communication on the Action Plan on Integration and Inclusion 2021–2027*, accessed 30 May 2025.

9 The reporting period included in this inform is from January 2020 to October 2025.

10 AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, NL, PL, SE, SI, SK.

11 European Migration Network, *Access to autonomous housing in the context of international protection – EMN inform*, February 2024, accessed 29 October 2025.

12 AT, CY, FR, IE, PL.

13 Reportedly €165 per month for an individual and €330 for a family.

14 CY, FR, IE.

15 ADA is a daily allowance for asylum seekers who have accepted the reception offer and meet defined age and income requirements.

16 ADA increased by an additional €7.40 per day. Asylum seekers may later be offered accommodation within the national reception system, in which case the increased ADA is terminated.

was unable to accommodate.^{17,18} In rare circumstances IPAS may provide a financial allowance as an alternative to housing in-kind when an individual can no longer be suitably housed in IPAS accommodation.

Germany uses financial allowances exceptionally in some federal states. Accommodation provision is a shared responsibility of the federal states and local government. While the Asylum Act determines that applicants for international protection must reside at reception centres,¹⁹ under the Asylum Seekers' Benefits Act the costs of accommodation may be provided as cash or in-kind.²⁰ On that basis, federal states can use alternatives to in-kind housing for applicants with particular needs. These alternatives include direct payments to landlords, transfers to payment cards or, exceptionally, cash allowances.

Box 1. Alternatives to in-kind housing in Sweden

Before 1 March 2025, applicants for international protection in Sweden had the right to a daily allowance, regardless of whether they lived in reception centres assigned by the Swedish Migration Agency (SMA) or voluntarily opted to live in self-arranged housing. However, applicants living in self-arranged housing were entitled to a higher amount than those living in accommodation assigned by the SMA, to help cover the costs of their housing arrangements.²¹

After an amendment to the Act on the Reception of Asylum Seekers and Others entered into force in 2025, the entitlement to a daily allowance became clearly linked to an applicant's accommodation at a reception centre. As of 1 March 2025, newly arrived applicants are required to reside in accommodation

assigned by the SMA in order to be entitled to a daily allowance and, as of 1 September 2025, applicants of international protection are required to live in accommodation assigned by the SMA to be entitled to a daily allowance. Though exceptions to the accommodation requirement may be granted where special grounds exist (e.g. health related reasons or applicants staying with resident family members), applicants that live in self-arranged housing risk are no longer entitled to a daily allowance in Sweden.

3.1. Circumstances for the implementation of alternatives to in-kind housing provision

The circumstance driving alternative arrangements to in-kind housing vary between countries. In Austria, alternatives to in-kind housing are a continuous feature of the reception system. In France, they are used as both a structural component of the reception system and as a response to reception capacity constraints during periods of high pressure. In Ireland, they are used as a response to in-kind reception capacity constraints during periods of high pressure. Applicants are made in-kind accommodation offers as soon as space becomes available. Cyprus and Poland implement their alternatives to in-kind housing under all three conditions: during periods of high pressure, as a continuous component of their reception systems, and as part of their preparedness measures. Similarly, federal states in Germany can make use of alternatives to in-kind housing under all three conditions.

Table 1. Circumstances for implementation of alternatives to in-kind housing

EMN Member Country	Continuous feature of the reception system	Used during periods of high pressure on reception centres	Preparedness measure
Austria	✓		
Cyprus	✓	✓	✓
France	✓	✓	
Germany (some federal states only)	✓	✓	✓
Ireland		✓	
Poland	✓	✓	✓

17 Allowance increased by €75 per week.

18 This practice was challenged before the High Court of Ireland by the Irish Human Rights and Equality Commission (IHREC), the national human rights institution and equality body. The High Court found that the state had failed to meet the needs of applicants for international protection by leaving them without accommodation or the means to access accommodation, violating their right to human dignity guaranteed under Article 1 of the Charter of Fundamental Rights of the European Union (the Charter). This case was later appealed by the state and the Court of Appeal ruled that there was not sufficient evidence to prove that the physical and mental health of applicants was undermined, or that these were in a state of degradation incompatible with human dignity. Following an application by the IHREC for permission to appeal the Court of Appeal's decision before the Supreme Court, the Supreme Court ruled in November 2025 that it will hear the appeal. European Union Agency for Asylum (EUAA), 'Case Law: Irish Human Rights and Equality Commission v Minister for Children, Equality, Disability, Integration and Youth & Ors', accessed 28 November 2025; Irish Human Rights and Equality Commission (IHREC), 'Supreme Court grants Commission leave to appeal in unaccommodated international protection applicants case', 7 November 2025, accessed 8 January 2026.

19 Asylum Act, Section 47.

20 Asylum Seekers' Benefits Act, Section 3(2).

21 The daily allowance amounts were defined with the introduction of the Act on the Reception of Asylum Seekers in 1994 and have not been adjusted since. A single adult in self-arranged housing would have been entitled to a daily allowance of SEK 71, while a single adult residing in accommodation assigned by the SMA would be entitled to a daily allowance of SEK 24.

3.2. Determining the amount of financial housing allowance

The EMN Member Countries²² that provide a financial allowance as an alternative to in-kind housing take two distinct approaches to determining the amount of support: national fixed-rate systems and locally determined rates.

In four EMN Member Countries,²³ the financial housing allowance is calculated according to a fixed-rate system, typically set by ministerial decision or regulation. In Cyprus, the social welfare services determine the amount based on national standards of living, with no variation across regions. In France, the starting ADA varies by family size, but the additional amount for housing remains fixed, regardless of family size or location.²⁴ Ireland provides a standardised weekly payment to applicants who are not offered in-kind housing. This amount is reportedly in line with the amounts paid by other European countries to applicants for international protection that are not in state

supported accommodation.²⁵ In Poland, the amount of financial support is defined by ministerial regulation setting fixed rates depending on household size.

By contrast, Austria applies locally determined rates. Maximum rates²⁶ are set nationally, but provinces retain discretion to adjust the amount based on individual needs considerations. However, provinces may only settle an amount up to the maximum rate with the federal government.

In those federal states in Germany that make use of alternatives to in-kind housing in exceptional cases, the amount of financial assistance is determined by the local benefits authority area, not by the federal state. No flat-rate system is applied; instead, the amount is determined by such an authority on a case-by-case basis, depending on the adequacy of the housing space available to and used by the applicant.

Table 2. Determination of financial allowance

EMN Member Country	Fixed-rate system	Locally determined rate
Austria		✓ (maximum rates set nationally)
Cyprus	✓	
France	✓	
Germany (some federal states only)		✓
Ireland	✓	
Poland	✓ (depending on household size)	



4. ELIGIBILITY CRITERIA FOR ALTERNATIVES TO IN-KIND HOUSING

Eligibility for alternatives to in-kind housing is generally determined through a **combination of administrative requirements and vulnerability assessments** but may also be linked to reception capacity constraints.

Three EMN Member Countries²⁷ have specific eligibility criteria to access alternatives to in-kind housing. In Austria, individual decisions are made at provincial level. As a general rule, applicants are required to provide evidence of the need for financial support to cover their housing arrangements (e.g. rental agreement).

Box 2. Eligibility criteria for alternatives to in-kind housing in France

In France, to be eligible for the ADA, all applicants for international protection are required to hold a valid asylum application certificate, have resources below the statutory threshold (*revenu actif de solidarité, RSA*), and have accepted an offer of material reception conditions made by the French Office for Immigration and Integration (*Office français pour l'immigration et l'intégration, OFII*), as well as the geographical orientation determined by the OFII under the National Reception Scheme for Asylum Seekers and Refugees (*Schéma National d'Accueil des Demandeurs d'Asile et des Réfugiés, SNADAR*). As in-kind housing is prioritised for people identified as vulnerable, OFII conducts

²² AT, CY, FR, IE, PL.

²³ CY, FR, IE, PL.

²⁴ ADA increased by a flat rate of €7.40 per day.

²⁵ Department of Children, Equality, Disability, Integration and Youth, 'Response to parliamentary question 2672/24', 2024, accessed 25 October 2025.

²⁶ Maximum amount is €165 for individuals and €330 for families per month.

²⁷ AT, FR, PL.

a vulnerability assessment interview when the asylum application is registered, to assess the suitability of granting an alternative to in-kind housing and any potential special reception needs. To benefit from the increased ADA including the daily amount granted as an alternative to in-kind housing, the applicant for international protection must meet all eligibility criteria, have expressed a need for housing, and not have access to free housing within the national reception system or to any other housing made available to them without cost. The applicants themselves may express their housing need when registering their asylum application, at which point OFII offers in-kind housing or the increased ADA as an alternative.

In Poland, eligibility for the cash allowance to live outside reception centres is defined in legislation and includes several scenarios: organisational necessity, safety concerns (particularly for single women), public order considerations,

preservation of the family unit, and preparation for independent living following the asylum procedure. These criteria are assessed by the Head of the Office for Foreigners, who then authorises or denies the provision of financial support.

In Cyprus, eligibility for alternatives to in-kind housing is linked solely to the unavailability of in-kind accommodation as financial allowances are provided primarily in cases where reception centre capacity is insufficient.

In Ireland, alternatives to in-kind housing are available for applicants who temporarily cannot be accommodated in reception centres due to capacity constraints. Ireland prioritises families, couples and single women for IPAS accommodation. As a consequence, single adult men are the main group offered an alternative to in-kind housing in the form of a financial allowance. Vulnerability triage assessment prioritises those within this cohort for any IPAS accommodation that may become available (e.g. those with urgent health needs).

Table 3. Eligibility criteria

EMN Member Country	Eligibility criteria
Austria	- Foreigner's need for assistance and protection - Appearing generally suitable providing evidence of the need for support (in particular a rental agreement).
Cyprus	No specific criteria. Eligibility solely linked to unavailability of in-kind accommodation at reception centres
France	- Acceptance of reception conditions offered by OFII - Express need for accommodation and no access to free housing
Germany (some federal states only)	Individual needs assessment
Ireland	- Lack of availability of in-kind accommodation at reception centres - Suitability for scheme in accordance with vulnerability triage assessment
Poland	Criteria include organisational necessity, safety concerns, public order considerations, preservation of the family unit, and preparation for independent living following the asylum procedure



5. ENSURING MANDATORY PROVISION OF SERVICES

Provision of essential services such as legal support, psychological assistance and healthcare remains a central component of the reception framework of all countries implementing alternatives to in-kind housing. Despite differences in delivery models, several common themes emerge in how these services are ensured for applicants residing outside reception centres.

Four EMN Member Countries²⁸ provide applicants with access to mainstream public services available to their nationals or residents or provide those services through reception centres irrespective of housing arrangements. France and Ireland have systems of support to ensure continuity regardless of accommodation type. In France, applicants not housed in reception centres are supported

through the Initial Reception Establishment for Asylum Seekers (*Structure de premier accueil des demandeurs d'asile*, SPADA) association, which provides administrative and social assistance, including guidance on legal aid and access to social rights (including healthcare). After three months of continued residence in France,²⁹ all applicants, regardless of where they are housed, become eligible for universal healthcare protection (*Protection Universelle Maladie*, PUMa). To access this protection, applicants must submit their application through the local primary health insurance fund (*Caisse Primaire d'Assurance Maladie*, CPAM). Applicants living outside reception centres receive support from SPADA to submit this application. However, even before affiliation with PUMa, applicants living outside reception centres can access urgent healthcare services

²⁸ AT, DE, FR, IE.

²⁹ Three-month eligibility for PUMa is not applicable to minors, who are eligible immediately.

through hospital healthcare access points. These include treatment for any life-threatening risk, serious deterioration of health, and pregnancy or postnatal care.

In Ireland, a vulnerability triage assessment ensures that applicants with serious health concerns receive in-kind accommodation. Regardless of where they are housed, all applicants receive information booklets accompanied by in-person explanations of how to access medical and emergency services and contact details for legal aid. Ireland relies primarily on service provision available to all of its nationals and residents, while non-government organisations (NGOs) operate a network of clinics and supports for applicants.

Austria applies an approach centred on independent living for applicants living outside reception centres, while

maintaining the same overall entitlements as applicants receiving in-kind housing. As the system emphasises self-sufficiency, individuals in private accommodation are expected to arrange and attend healthcare and other essential services independently. If additional support is needed, applicants can get in touch with the respective reception authority to request it.

Poland has developed specific mechanisms to provide services to applicants living outside reception centres. Medical and psychological services for applicants for international protection are provided by a designated medical provider based on a contract with the Office for Foreigners. Applicants residing outside reception centres access these services through specific facilities cooperating with their medical provider, with a hotline to schedule appointments and fill prescriptions.

Table 4. Ensuring mandatory provision of services

EMN Member Country	Provision of services
Austria	Same overall entitlements as applicants receiving in-kind housing, but applicants arrange and attend healthcare and other essential services independently
Cyprus	Access to public health services available to all nationals and residents. Legal support provided by NGOs
France	Same services provided through the reception centres, regardless of housing arrangements
Germany (some federal states only)	Access to public health services available to all nationals and residents. Other support services provided equally, regardless of housing arrangements
Ireland	Access to public services available to all nationals and residents
Poland	Specific mechanisms to provide services to applicants living outside reception centres

Box 3. Specific measures for applicants with special reception needs in alternative to in-kind housing programmes

The six EMN Member Countries³⁰ with alternatives to in-kind housing schemes have specific measures to support applicants with special reception needs, including unaccompanied minors, single parents, persons with disabilities, and individuals with vulnerabilities. These support measures include provision of in-kind housing at reception centres or dedicated housing facilities. In France, some accommodation places are reserved for vulnerable asylum seekers, with additional resources for enhanced security and support. There are dedicated places for women victims of violence and/or human trafficking and their children, *as well as*

LGBT+ friendly centres. Some facilities also provide accessible units for people with reduced mobility.

In Poland, applicants with certain special reception needs may remain eligible for alternative to in-kind housing programmes and therefore have access to specific services. The Head of the Office for Foreigners determines whether an applicant qualifies for special support, which may include dietary adjustments or access to specialised care.

In those of Germany's federal states that apply alternatives to the provision of in-kind housing, the local benefits authority assesses individual needs and decides on any necessary support measures in accordance with the Asylum Seekers' Benefits Act.



6. SYSTEMS USED TO MONITOR APPLICANTS IN ALTERNATIVES TO IN-KIND HOUSING SCHEMES

The six EMN Member Countries³¹ that have implemented alternatives to in-kind housing take different approaches to monitoring applicants residing outside reception centres. Austria, France and Poland have mechanisms

to monitor applicants for international protection residing in alternatives to in-kind housing. Although not necessarily specific to applicants in private housing arrangements, they can provide oversight and ensure that financial housing

30 AT, CY, DE, IE, FR, PL.

31 AT, CY, DE, FR, IE, PL.

allowances are still required by the applicant. Cyprus and Ireland rely on applicants' obligations to keep updated records, while local authorities in Germany track applicants.

Austria maintains a data network system for the administration of all applicants in need of assistance and protection, with applicants obliged to attend regular appointments with authorities (typically every one to two months). These checks are in addition to checks on the need for assistance. France operates an automated national reception system (*DN@-NG*), which records personal data and monitors all recipients of the ADA, including those not housed in reception centres. Poland requires applicants receiving financial assistance outside reception centres to provide a current address and conducts regular checks.

These include verification of benefit collection and home visits to confirm continued eligibility and presence.

Cyprus has no monitoring mechanism to track applicants in alternatives to in-kind housing. As per its Refugee Law, it relies on applicants' obligation to register any new address with the District Immigration Police.

In some federal states in Germany, the local authorities that approve alternatives to in-kind housing for applicants for international protection are obliged to track these applicants and their associated benefits. This system is similar to Germany's tracking of social aid schemes, where recipients have to prove their continued need for support and benefits are adapted as their situation changes.

Table 5. Applicant monitoring systems for alternative to in-kind housing schemes

EMN Member Country	Established monitoring mechanisms	Reliance on self-reporting by applicant	Other
Austria	✓		
Cyprus		✓	
France	✓		
Germany (some federal states only)			✓ Local authorities
Ireland		✓	
Poland	✓		



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