





European Migration Network Inform

November 2022

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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, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK) collected via a Common Template developed by the EMN NCPs to ensure, to the extent possible, comparability. National contributions were largely based on desk analysis of existing legislation and policy documents, reports, academic literature, internet resources and reports and information from national authorities rather than primary research. The listing of the EMN Member and Observer Countries in the inform following the presentation of synthesised information indicates the availability of relevant information provided by those EMN Members and Observers Countries in their national contributions, where more detailed information may be found and it is strongly recommended that these are consulted as well.

It is important to note that the information contained in this inform refers to the situation in the abovementioned EMN Members and Observer Countries up to 1st September 2022 and specifically the contributions from their EMN National Contact Points.

EMN NCPs from other Member States could not, for various reasons, participate on this occasion in this inform, but have done so for other EMN activities and reports.

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() 1. INTRODUCTION

This inform analyses the arrangements European Union (EU) Member States have put in place for accommodation and housing for beneficiaries of temporary protection, in the context of the activation of the Temporary Protection Directive (TPD) (2001/55/EC),¹ triggered in response to Russia's invasion of Ukraine on 24 February 2022.² Article 13(1) of the TPD requires Member States to ensure that persons entitled to temporary protection have access to suitable accommodation or, if necessary, receive the means to obtain housing.

According to the Office of the United Nations High Commissioner for Refugees (UNHCR), as of 15 November 2022, over 7.8 million people (mainly women and children) had left Ukraine in search of safety, arriving primarily in neighbouring EU and third countries.³ Eurostat data catalogues the numbers of Ukrainians granted temporary protection from March to September 2022, for those Member States for which data are available, demonstrating the magnitude of the situation.⁴ The large number of persons fleeing Ukraine resulted in high demand for immediate support and Member States responded by

2. KEY POINTS

- The majority of responding Member States use several housing and accommodation options in parallel, primarily reception centres established host persons fleeing Ukraine, as well as accommodation offered by private individuals and legal entities. Some responding Member States also make use of existing reception facilities for asylum seekers/beneficiaries of international protection.
- Financial support for accommodation is provided to municipalities/entities offering housing and/or directly to persons fleeing Ukraine. Some responding Member States have activated schemes that provide financial support to private individuals housing persons fleeing Ukraine.
- There are attempts to coordinate the provision of accommodation by private individuals. This is done through central/local level coordination, but

offering a combination of housing and accommodation options.

This inform is complementary to the Safe Home initiative announced in March 2022 by the European Commission to support Europeans voluntarily hosting those fleeing the war, notably by mobilising dedicated EU funds and instruments for initial housing solutions and for longterm accommodation. In July 2022, the Commission introduced the Safe Homes guidance,⁵ endorsed by the Solidarity Platform, advising EU countries how to provide safe and suitable accommodation for people fleeing the war in Ukraine. It outlines the key principles for supporting hosts, as well as matching and ensuring safe and suitable housing for those in need. The guidance also looks at sustainable housing solutions for the future, particularly the possible role of community sponsors in welcoming newcomers.

The analysis in this inform is based on contributions provided by 24 Member States,⁶ with information updated as of 1st September 2022.⁷

also often relies on coordination by civil society and non-governmental organisations (NGOs). However, such coordination efforts do not preclude the existence of private housing initiatives outside the official system.

Challenges encountered by Member States related to housing and accommodation include limited housing capacity and availability of emergency accommodation, meeting the specific needs of those arriving, especially vulnerable groups, and short timeframes to allocate people to housing options. Specific challenges reported in relation to private accommodation include the temporary nature of this type of accommodation, financial burden for Member States, language barriers between persons fleeing Ukraine and host families, and the risk of exploitation and abuse.

3. MAIN FORMS OF ACCOMMODATION OFFERED

The majority of Member States use a combination of different forms of accommodation to host persons fleeing Ukraine: **Reception centres:** Most of the responding Member States⁸ established new reception centres for people fleeing the war in Ukraine, while some⁹ (also) make use of existing reception centres intended for applicants or beneficiaries of international protection.

- Eurostat data, available at: https://ec.europa.eu/eurostat/web/products-eurostat-news/-/ddn-20221110-2, last accessed on 18 November 2022.
 European Commission, 'Safe Homes guidance', https://home-affairs.ec.europa.eu/safe-homes-guidance_en, last accessed on 18 October 2022.
- European Commission, 'Safe Homes guidance', https://home-affairs.ec.europa.eu/safe-home
 AT, BE, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, SE, SI, SK.
- Based on information provided through the EMN ad hoc query (AHQ) mechanism (AHQ 2022.18 and AHQ 2022.23).
- 8 AT, BE, CZ, DE, EE, EL, ES, FI, FR, HR, HU, IT, LT, LU, NL, PL, SE, SK.

¹ Council Directive 2001/55/EC of 20 July 2001 on minimum standards for giving temporary protection in the event of a mass influx of displaced persons and on measures promoting a balance of efforts between Member States in receiving such persons and bearing the consequences thereof, https://eur-lex.europa.eu/legal-content/EN/TX-T/?uri=celex%3A32001L0055, last accessed on 18 October 2022.

² Decision 2022/382 of 3 August, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L_2022.071.01.0001.01.ENG&toc=OJ%3AL%3A2022%3A071%3ATOC, last accessed on 18 October 2022.

³ UNHCR data, available at: https://data2.unhcr.org/en/situations/ukraine, last accessed on 18 November 2022.

⁹ AT, DE, EL, ES, FI, MT (only), PL (this possibility applies to persons to whom a certificate confirming they are beneficiaries of temporary protection has been issued at the Office for Foreigners, however in practice it is not often used because most of them decided to live outside the centre for foreigners), SE, SI (only), SK.

- Hotels/hostels: Member States often make use of hotels/hostels,¹⁰ which are the main form of accommodation provided in Bulgaria,¹¹ Cyprus¹² and Ireland.¹³ Hotels/hostels are mostly used as emergency accommodation, during registration, and before a more permanent solution is found.¹⁴
- Temporary housing offered by private households: In the majority of Member States, private citizens have made their homes available to persons fleeing the war in Ukraine (this does not include forms of accommodation for which beneficiaries of temporary protection have signed a rental agreement, or accommodation offered to them by family or friends). However, Member States do not have available statistics on all private housing initiatives beyond those coordinated by NGOs or the state.
- Other forms of emergency or temporary accommodation¹⁵ included tents or campsites;¹⁶ sports halls, schools, cultural centres and other governmental or municipal facilities;¹⁷ industrial and office buildings, social housing, and monasteries;¹⁸ as well as ships.¹⁹

A few Member States²⁰ could provide data on the **use of accommodation in private households** (i.e. private citizens/ households hosting beneficiaries through their own initiatives or via schemes coordinated by the state or NGOs) compared to other forms of accommodation. In the Netherlands, 1 866 of beneficiaries of temporary protection were housed through RefugeeHomeNL (a collaboration of three NGOs financed by the Ministry of Justice and Security), which matches private households to persons fleeing the war in Ukraine. However, there is no available data on the number of beneficiaries hosted privately outside of RefugeeHome (e.g. with family, friends or other private initiatives).²¹ In the Slovak Republic, the share of accommodation provided by private individuals was approximately 55 % and in Latvia, it amounted to 66 %. In Germany, observations suggest that the share of private accommodation ranged from about 10 % to 80 %, depending on the municipality. Croatia, Italy and Latvia estimated that the share of displaced persons in private accommodation offered by private households (including accommodation provided by friends and family) was around 85-90 %. In Belgium, it was around 66-80 %, depending on the region, and in Finland, it was estimated at 52 %.²² The share of private housing is expected to decrease in Belgium as more structural solutions for alternative housing will be provided by the regions in the medium to long term.

4. FORMS OF FINANCIAL ASSISTANCE FOR HOUSING OFFERED

The forms of financial assistance provided by Member States to support housing offered to beneficiaries of temporary protection vary. Some Member States provide financial assistance directly to beneficiaries of temporary protection (section 4.1), others direct the funding towards private households offering to host beneficiaries of temporary protection (section 4.2), while still others assist through local institutions and municipalities in charge of organising suitable housing (section 4.3). This section does not take into account other forms of benefits and financial assistance that Member States may provide to beneficiaries of temporary protection (see EMN Inform on access to services and benefits for beneficiaries of temporary protection).

Financial assistance offered to beneficiaries of temporary protection

Article 13(1) of the TPD stipulates that, if necessary, persons enjoying temporary protection should receive the means to obtain housing.

Seven Member States²³ provide specific financial allowances directly to beneficiaries of temporary protection to cover/assist with the costs of their accommodation in certain circumstances (excluding living allowance). In the Netherlands and the Slovak Republic,²⁴ this allowance is only paid in situations where the person is not housed in a (temporary) reception centre. Other Member States, such as Finland and Sweden, provide free housing and therefore do not offer an additional allowance.

In Lithuania, the housing allowance to which beneficiaries of temporary protection may be entitled to is the same as that made available to Lithuanian nationals. In Ireland, beneficiaries of temporary protection renting on

- 10 BG, CY, CZ, DE (in some federal states), EE, FR, HR, IE, IT, LT, LU, NL, PL, SK.
- BG provides accommodation in places included in the national Tourist Register or in the Register of places for accommodation that was specifically created as part of the Programme for the Benefit from Humanitarian Aid by Persons Seeking Temporary Protection in the Republic of Bulgaria as a Result of the Military Actions in Ukraine.
 In CY, 3 000 hotel rooms have been secured until end of April 2022.
- 13 The majority of beneficiaries of temporary protection who arrive seeking accommodation are housed in emergency accommodation in hotels in the first instance.
- 14 BE, CZ (emergency accommodation (usually up to 90 days), DE (in some federal states), EE, FR, IE, LV.
- 15 In DE, the provision of other forms of emergency or temporary measures may differ between the federal states.
- 16 IE, LU, PL, SK.
- 17 BE, BG, CZ, FR, IT, LT, LU, LV, NL, PL, SE, SK.
- 18 BE, CZ, LT, LU, NL, SK.
- EE (Tallinn Group's passenger ship MS Isabelle, as a temporary measure from 7 April 2022), FR (the state asked Corsica Linea to make its Mediterranean ferry available to Ukrainian refugees for two months during spring 2022; up to 1 600 persons can be accommodated on this ferry), NL.
 BE, DE, FI, HR, IT, LV, NL, SK.
- 21 In the Netherlands, as of 1 September, there were 76090 persons registered at municipalities, 59014 of those were housed in municipal reception centres and 17076 persons in other types of accommodation.
- 22 As no data are available, it is not possible to distinguish between private accommodation by private individuals who are not family members or close friends and private accommodation by private individuals who are family members or close friends.
- 23 AT, DE, EE, ES, IE (beneficiaries of temporary protection renting on the private market may be entitled to certain payments related to housing costs), LT, NL (only if the beneficiary of temporary protection stays with private individuals).
- 24 According to the Law on Asylum, this option exists in SK, but has not been used since the outbreak of the war.

the private market may be entitled to certain payments related to housing costs that are also available to Irish nationals. In Latvia, if beneficiaries rent an apartment from private persons, the latter can receive \in 400 in

compensation, including utilities for a maximum of 120 days and no longer than 31 December 2022. Table 1 provides an overview of the financial support available for housing for beneficiaries of temporary protection.

Table 1. Specific financial support for housing for beneficiaries of temporary protection

Member State	Type of support
Austria	Monthly allowance: Beneficiaries of temporary protection in private accommodation, who cannot provide for themselves financially and are therefore entitled to basic care benefits, receive inter alia rent subsidy of up to ≤ 165 for a single person and ≤ 330 for families as well as money for daily necessities of up to ≤ 260 for an adult and ≤ 145 for a child.
Germany	Until 31 May 2022, financial benefits for housing were granted in accordance with the Asylum Seekers' Benefits Act. Since 1 June 2022, beneficiaries of temporary protection enjoy the same social benefits as German citizens if they meet the necessary requirements. However, benefits in accordance with the Asylum Seekers' Benefits Act may be granted to cover the transitional period until beneficiaries are fully processed and found eligible for general social benefits. Such financial benefits may be used to cover certain expenses (e.g. rent, daily allowances, utility costs). Decisions on the amount of the financial support are taken by the local government. The duration and the amount granted depend on the individual case.
Estonia	One-off payment – People/families who initially stayed in state-provided temporary housing are entitled, when transferring to more permanent accommodation arrangement, to coverage of one-time expenses related to entering into a rental contract for a dwelling granted for use to a beneficiary of international protection. The support is paid by local municipalities and is up to six times the subsistence level of family (currently $6 \times \epsilon 200 = \epsilon 1 200$). Like any other resident of Estonia, beneficiaries can apply for needs-based support to cover monthly rental costs, including utilities.
Ireland	Beneficiaries of temporary protection who incur rent costs may qualify for rent supplement at equivalent rates to Irish nationals and others with permission to reside in Ireland. Criteria for rent supplement have been specifically adapted for beneficiaries of temporary protection.
Lithuania	Same housing allowance as nationals.
	Ukrainian individuals or families can receive allowance for their rent, if: they have declared their assets and income and whose income does not exceed the limits can apply for housing rent compensation; do not own a dwelling in Lithuania (or the dwelling they own is not suitable for living); have rented housing in the municipality for at least one year and have declared their place of residence.
	The amount of compensation depends on the municipality in which the person or family rents the apartment, the size of the apartment and the number of persons in the family. Ukrainians can also apply for one-off settlement allowance.
The Netherlands	Monthly allowance - Beneficiaries housed in private homes receive an additional housing allowance of \in 215 per adult per month and \in 55 per minor.
Slovenia	Beneficiaries can apply for financial assistance for private accommodation. The amount depends on the number of family members and their incomes, and is measured as a percentage of the basic amount of the minimum income, which is currently \in 421.89 (1 person 100 %, 2 people 130 %, 3 people 160 %). The specified amounts are maximum, i.e. if a lower amount is specified in the rental agreement, the contractual amount is considered. The decision to receive financial assistance is issued for a period of three months. If beneficiaries want to continue to receive funds, they must submit a new request before the expiry of the valid decision.
Spain	Monthly allowance - The allowance ranges from a maximum \in 376/month for one person, to \in 780/month for a family unit of eight. A complementary allowance is available to cover the deposit, the services of a real estate agency and home insurance.

Financial support for private households hosting people

Several²⁵ of the Member States using accommodation offered by private households have specific

schemes in place to financially support or recognise the contribution of host households. The amounts and duration of these payments vary (from seven days to several months, up to a maximum of one year) and are often based on the number of people hosted. Rates for children are often lower than those for adults. In Germany, where reception and housing are decentralised, local governments set their own rates.

A majority of Member States reported not providing cash support to private households for hosting persons fleeing Ukraine,^{26,27} although some pointed to financial support for subsistence. Belgium and the Netherlands, for example, reported that people from Ukraine could choose to

use their financial assistance to contribute to the private household hosting them. In Slovenia, only beneficiaries can apply for financial assistance, but if they and the landlord agree, the financial assistance can be transferred directly to the landlord. Table 2 provides a summary of the main types of financial support provided for private households hosting people fleeing the invasion of Ukraine.

Table 2. Financial support for private householdshosting people fleeing Ukraine

Member State	Type of support
Croatia	The support offered depends on the number of people hosted and ranges from HRK 50-100 (\in 6-12) per day for each person accommodated. It is limited to HRK 3 600 (\in 478) per month per household.
Czech Republic	A solidarity allowance of CZK 3 000 (approximately \in 125) is provided per hosted person, per calendar month, and for a maximum of four hosted persons.
Germany	Rates are decided by the local governments and differ between states. The local rent index is one of the metrics used to determine the exact allowance in each individual case, and may vary substantially between the municipalities. The person's individual financial situation is also taken into account.
Ireland	A tax-free recognition payment of \in 400 per month is available to households hosting bene- ficiaries of temporary protection. Payment is per pledged property, not per person hosted, and is based on a minimum hosting commitment of six months. The payment is available to those hosting in their own home or providing accommodation in a vacant property. It is not intended to cover costs incurred by hosts.
Latvia	Private citizens hosting Ukrainian nationals have the right to receive compensation of \in 100 per month for the first hosted person and \in 50 per month for each next hosted person, up to a total of \in 300 per month for all persons accommodated in one housing unit, and for a maximum duration of 120 days.
Lithuania	The amount of compensation for the provision of accommodation to Ukrainian nationals depends on the number of people hosted: \in 150 for one person, with \in 50 for each additional person living in the same housing. To benefit from this allowance, the first month of accommodation has to be offered for free.
Poland	A natural person providing accommodation to Ukrainian citizens may be granted, at their request, a cash benefit of PLN 40 (\in 9) per person per day, for no longer than 120 days. The period of payment of the benefit may be extended for a period longer than 120 days in the case of providing accommodation and meals to a citizen of Ukraine who, due to special personal conditions (e.g. disability, old age, single parent of at least three children, pregnancy) cannot become independent.
Slovakia	The contribution amounts to \in 8 per night of accommodation for a person with temporary protection who has reached the age of 15, or \in 4 for a person under the age of 15.

Half of the Member States²⁸ offering financial support observed that the compensation offered could act as an incentive for private households to offer their accommodation. Poland noted that obtaining compensation was often an important factor for hosts. In Lithuania, compensation serves as a stimulus to encourage private households with additional housing and other suitable living quarters to provide accommodation for Ukrainians. In Germany, some federal states reported that financial support could be relevant, while others could not yet determine if it made a material difference. The Slovak Republic observed that as the need for accommodation became more long term in nature, the importance of financial compensation increased.

Financial assistance offered to municipalities or other institutions

In addition to funding beneficiaries of temporary protection and private households offering accommodation directly, several Member States²⁹ provide financial support to municipalities or other institutions housing displaced people from Ukraine. In Finland, financial support is given to municipalities that accommodate beneficiaries in furnished apartments through a so-called municipality

28 DE, LT, PL, SK.

²⁶ AT, BE, BG, CY, EE, ES, FI, HU, IT, LU, MT, NL, SE, SI.

²⁷ FR plans to propose a cash support of \in 150-200 for private households, but the measure has yet to be implemented.

²⁹ BE, BG, CZ, EE (temporary measure), FI, FR, LV, NL, SK.

model and rental rates vary by municipality. In Belgium (Flanders), local authorities receive a subsidy for the accommodation of beneficiaries of temporary protection on the basis of their registration in the Belgian National

Register.³⁰ In Latvia, the costs incurred by municipalities for accommodation services are covered up to a maximum of \in 15 per person per day.

5. COORDINATION OF PRIVATE ACCOMMODATION INITIATIVES

Private housing constitutes one of the main accommodation options for beneficiaries of temporary protection across the EU. In some Member States, private housing initiatives are coordinated by central³¹ and/or regional/local³² authorities. In France, for example, private individuals wishing to offer 'citizen hosting' (hébergement *citoyen*) are invited to fill in a form on an online platform, specifying the type, location and availability of their accommodation. Once submitted, the prefecture, through a local referral association, matches the accommodation offers of private individuals with the needs of displaced persons from Ukraine. In Austria, private individuals or organisations with vacant real estate or rooms can register via an online form. The Federal Agency for Reception and Support Services reviews the offers and forwards them to the provinces.

Several Member States³³ have set up multi-actor coordination mechanisms between a central authority, regional/ local authorities, and/or civil society organisations such as the Red Cross. In Austria, the Federal Agency for Reception and Support Services coordinates accommodation in close cooperation with the Ministry of the Interior, the provinces and civil society organisations. In the Czech Republic, small-scale private housing initiatives are coordinated by the National Assistance Centre for help to Ukraine and managed by NGOs and regional and local authorities. In Luxembourg, the National Reception Office and the Ministry of Family Affairs are supporting a joint

Red Cross/Caritas initiative to collect and verify offers by Luxembourg residents and match them with beneficiaries.

In many cases, civil society organisations play a leading role in coordinating the placement of beneficiaries of temporary protection in private households.³⁴ The Red Cross is a leading coordinator of private accommodation initiatives in four Member States.³⁵ In Lithuania, the main private hosting initiative is coordinated by the national volunteer support coordination centre, 'Strong Together', with oversight and support from the government. In Spain, La Caixa Foundation coordinates a family placement programme that matches Ukrainian families with foster families (see box below).

In **Spain**, the Department of Inclusion, Social Security and Migration, in collaboration with La Caixa Foundation, coordinates a family placement programme that matches Ukrainian families with host families. The Caixa Foundation has set up several Foster Offices to screen the requests of volunteer families wishing to take in a Ukrainian family. If the request is accepted, it will be referred to the Department of Inclusion, Social Security and Migration, which matches displaced families with the foster families that can best meet their needs. The pilot family placement programme is underway in Barcelona, Madrid, Málaga and Murcia, which have received most displaced Ukrainians.

6. CHALLENGES IN PROVIDING ACCOMMODATION

The main challenges identified by Member States related to their already **limited housing capacity**³⁶ and lack of emergency accommodation.³⁷ In some Member States, these challenges were particularly noted in bigger cities.³⁸ Germany reported that while it was common for those seeking protection to prefer urban areas, this preference was even stronger among beneficiaries of temporary protection from Ukraine. Several Member States mentioned that they had to³⁹ - or would soon need to40 - resort to territorial redistribution to

manage the situation. In Sweden, on 1 July 2022, a new law was introduced requiring municipalities to take over the responsibility for arranging housing for beneficiaries of temporary protection. The aim of the new law is for Sweden's municipalities to share the responsibility of arranging housing, schooling and care for people who have fled the war in Ukraine.

Other key challenges highlighted were the need to respond within a **short timeframe**⁴¹ and meeting the many needs of those arriving,⁴² as it put strains on

- AT, BE, CZ, EE, FR, HR, IT, PL, SK. AT, BE, CZ, ES, HR, FR, IE, LT, SK. 32 33
- 34

35 FI, IE, LU (with Caritas), NL (with two other NGOs). 36

- BE. DE (may differ between federal states). IE. SK. 37
- CZ, DE, LT (preference for cities with Russian-speaking schools plays a role), LV. FI, FR. 39
- CZ, LV (Riga reported at almost maximum capacity at the beginning of April; once maximum capacity is reached, the state will begin redistribution). 40
- 41 BE. DE. FI. IE. LU.
- BE, DE (may differ between federal states), ES, FI.

³⁰ The grant for accompaniment is calculated by multiplying the number of beneficiaries of temporary protection in the municipality registered in the national register by 400 and by 0.45 (i.e. number of beneficiaries in the municipality x 400 x 0.45). In addition, Flanders provides subsidies to local authorities to create public accommodation (a one-off lump sum of € 1 000 per public accommodation place) and for the availability of specific places in the welfare and tourism sector (a daily amount depending on the type of specific place, e.g. \in 35 per hotel room and \in 15 for a holiday home in a holiday park).

AT, BE, ES, HR, IT, SK.

AT, CZ, ES, FI, FR, HU, IE, NL (only in the private housing financed by the ministry (RefugeeHomeNL)), LU, LV.

BE, DE, CZ, EE, FI, FR, IE, LV, LT, NL, SE, SI, SK.

already limited resources, including staff capacity.⁴³ Lithuania reported a cyber-attack on the database of Stronger Together, the NGO coordinating accommodation options on 8 March 2022. Its website is the main information point on accommodation places available, volunteers offering transport services, etc.

Austria and the Slovak Republic reported difficulties in finding adequate housing and/or nursing places for people with physical or mental disabilities and for those requiring specialised medical care (e.g. cancer patients), while Germany referred to difficulties in finding accommodation for entire orphanages, or homes for the elderly as well as suitable nursing staff. Belgium, Estonia, Finland, Ireland and the Slovak Republic encountered challenges housing people who brought their pets, as reception centres and/ or hotels often do not allow animals. In response, Finland asked for flexibility from reception centres, then created a pet-friendly reception centre near Helsinki, which is also used for the mandatory 30-day quarantine (for pets and their owners) on arrival.

The reliance on **accommodation provided by private persons**, while allowing for a more rapid response and creating additional capacity, comes with some significant risks. Several Member States found it challenging to ensure the sustainability of the accommodation offered by private households, as many offers were temporary.⁴⁴ Luxembourg reported that hosting beneficiaries in private households could only serve as a temporary solution for the massive inflow of beneficiaries of temporary protection but could not be considered a long-term sustainable solution. Similarly, Finland reported the lack of predictability and continuity of private accommodation as potentially stressful for displaced persons who had to move to a reception centre when the private host was no longer willing to make their accommodation available.

The **financial costs** associated with private accommodation were considered challenging.⁴⁵ Poland highlighted difficulties in finding further state funding to support these private households. In addition, the rise in energy and heating prices is constantly analysed as part of the increase in the cost of maintaining collective accommodation.

Another challenge was that private hosts may not be able to provide adequate support given the vulnerabilities or special needs of the displaced persons.⁴⁶ The **language barrier** was highlighted as an issue by several Member States.⁴⁷ In Luxembourg, some interpretation services are provided for administrative steps.

Some Member States noted that private accommodation represented **a higher risk of abuse and exploitation**, especially where it is not properly coordinated or regulated.⁴⁸ Luxembourg and the Slovak Republic reported that many displaced persons did not wait for the official procedure and looked for a host family via social media, which increased the risk of exploitation.

⁴³ BE, DE (may differ between federal states), EE, ES.

⁴⁴ AT, BE, CZ, DE, ES, FI, FR, HR, LV, LU, PL, SK.

⁴⁵ BE, CZ, DE, ES, FR, HR, LT, LV, PL, SK. 46 BE, DE, FR.

⁴⁶ BE, DE, FR. 47 BE, DE, LU.

⁴⁸ BE, DE, FI, LU



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