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UKRAINIANS ABROAD:

Access to Public Services in the Context
of Temporary Protection Status and
Expected Return

December 2025

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**PREFACE BY
THE UKRAINIAN
PARLIAMENT
COMMISSIONER FOR
HUMAN RIGHTS**



Since the onset of full-scale armed aggression by the Russian Federation, millions of Ukrainian citizens have been forced to leave their homes and seek safety abroad. Most of them still have temporary protection or similar statuses, while remaining citizens of Ukraine who are entitled to proper communication with their state and access to its services.

The State of Ukraine bears direct responsibility for ensuring these rights, regardless of where its citizens are located. This is true for consular, social, pension and educational services, as well as general support for people who wish to maintain ties with their homeland or plan to return.

Over the past few years, the Commissioner's Secretariat has been systematically monitoring the observance of the rights of Ukrainians who have been affected by the war and found themselves outside the country. We have direct communication with citizens, Ukrainian communities, foreign diplomatic missions and partner organisations. In 2025, the Commissioner's Secretariat held 12 legal education webinars for Ukrainians in European and North American countries, as well as conducted monitoring visits abroad to communicate directly with Ukrainian citizens, authorities in their countries of residence, local self-government bodies and Ukrainian diplomatic missions. This experience allowed us to identify both individual cases of violations and systemic problems — those that require a comprehensive response from the State.

This policy brief summarises the findings from these activities. It is based on legal awareness webinars conducted by the Commissioner's Secretariat and monitoring visits to countries with large Ukrainian communities, as well as on feedback from citizens who have contacted the Commissioner's Secretariat regarding access to public services.

In addition to identifying existing problems, this document aims to outline ways to address them, including through enhanced digitalisation, interagency coordination, development of consular services, creation of reintegration mechanisms and formulation of a comprehensive state policy regarding Ukrainian citizens abroad.

I firmly believe that the practical implementation of the recommendations set out in the brief will help to strengthen citizens' trust in the State and ensure better protection of their rights.

I would like to express my appreciation to everyone who participated in the study.

Ukrainian Parliament Commissioner
for Human Rights

DMYTRO LUBINETTS

INTRODUCTION

Background and key challenges

According to the United Nations Refugee Agency (UNHCR)¹, as of mid-November 2025, more than 5.88 million people from Ukraine continue to reside abroad under various forms of temporary or humanitarian protection². Most of them are citizens of Ukraine who need guarantees that their rights will be protected and that they will be able to maintain contact with the State. In turn, Ukraine has a duty to ensure this connection — in legal, social and informational dimensions — by protecting the rights of Ukrainian citizens abroad and creating conditions for their dignified and voluntary return once international protection mechanisms have expired³.

For many citizens abroad, everyday life remains closely linked to Ukraine: not only through family, professional and cultural ties, but also through regular interactions with state institutions. Issuing passport documents, certifying and requesting documents, confirming disability status, assigning pensions, social benefits and ensuring access to education — all these issues are relevant for citizens living abroad. Despite measures taken by the State to expand opportunities for service delivery abroad — digitisation of services, opening of new institutions abroad, launch of online services — access to public services remains limited and patchy. Many countries lack the personnel and technical capacity, nor do they have comprehensive solutions to deliver the necessary services. Another challenge is low awareness of the services available.

At the same time, the European Union (EU), similarly to other countries of destination for refugees from Ukraine, is preparing to phase out the temporary protection regime. This could mean extending temporary protection regimes at the national level, gradually transitioning Ukrainian citizens to other forms of legal residence — i.e., residence permits linked to work, study or family reunification — or voluntary return to Ukraine.

In this regard, Ukraine requires a coordinated policy regarding its citizens abroad, which would ensure stable access to public and social services, maintaining connections with Ukrainian educational, social and legal systems, as well as creating an environment for informed and safe return in compliance with the European Convention on Human Rights.

1. UNHCR. Portal of operational data on Ukraine refugee situation.
<https://data.unhcr.org/en/situations/ukraine> (Last accessed: 16 November 2025).

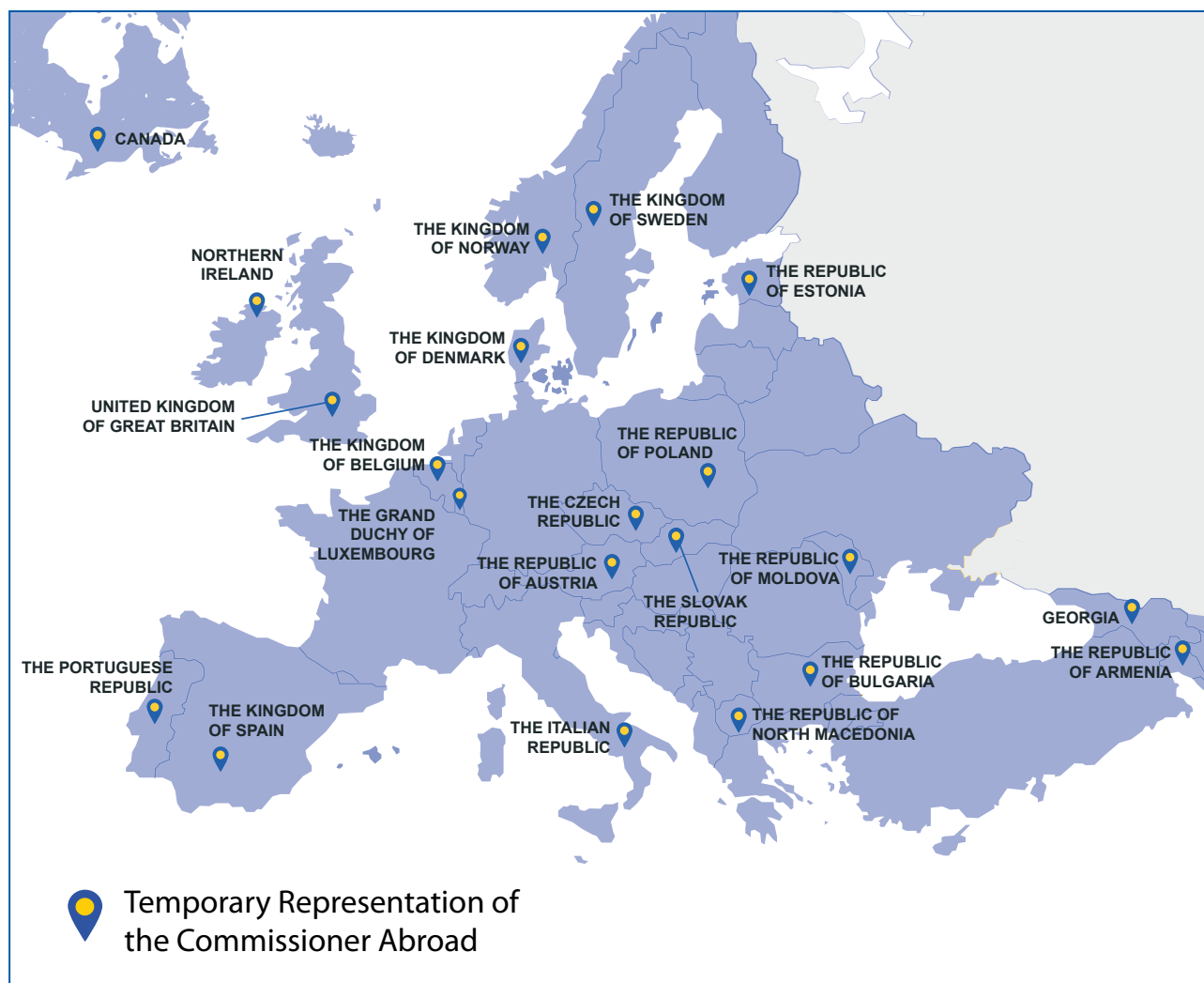
2. In this policy brief, temporary and humanitarian protection refers to various forms of legal status granted by the authorities of host countries to Ukrainian citizens who left the country due to the full-scale invasion of 2022 or were unable to return, and which provide the right to residence, access to the labour market, basic services and social protection.

3. In this policy brief, the term “citizens of Ukraine abroad” means persons who have Ukrainian citizenship and temporarily reside outside the State. For the sake of conciseness, the shorthand term “Ukrainians” is also used. This brief is limited in that it does not cover access to public services for foreign nationals and persons with refugee status or subsidiary status who were permanently residing in Ukraine prior to February 2022 but who left the country after the full-scale invasion began and obtained protection in another country. This issue requires separate research.

Activities of the Commissioner's Secretariat

In this context, the Secretariat of the Ukrainian Parliament Commissioner for Human Rights (the Commissioner's Secretariat) monitors the observance of the rights of citizens affected by the armed aggression of the Russian Federation. Within its mandate, the Commissioner's Secretariat monitors respect for human rights, including the rights of persons displaced by the war, both within the country and abroad. Its activities include monitoring living conditions, access to social and administrative services, documenting violations of rights and cooperating with international partners to strengthen protection in host countries.

Furthermore, it is worth noting that in 2022, the Commissioner's offices were expanded abroad: Order 85.15/22 dated 20 October 2022 approved the Regulation on Temporary Representation of the Commissioner Abroad. These offices receive applications, respond to violations of rights, cooperate with human rights bodies of host countries, and raise citizens' awareness about protection mechanisms⁴. As of November 2025, the Commissioner's temporary offices are operating in:



4. Ukrainian Parliament Commissioner for Human Rights. Order 85.15/22 dated 20 October 2022 "On Approval of the Regulation on the Temporary Representation of the Ukrainian Parliament Commissioner for Human Rights Abroad for the Duration of Martial Law in Ukraine".

Within its mandate, the Commissioner's Secretariat initiates analytical studies, legal awareness activities and monitoring visits aimed at identifying systemic barriers and improving state policy in the field of protection of the rights of displaced persons. For instance, in 2024, together with the Council of Europe Office in Ukraine, a thematic study "Forced Displacement Abroad"⁵, was conducted, enabling the key problems faced by people from Ukraine abroad to be systematised, and a series of monitoring visits were made to countries where large numbers of Ukrainian citizens reside.

The Commissioner's Secretariat continued this activity in 2025, focusing on the practical aspect of access to public services. With the support of Council of Europe Project "Facilitating access to human rights and essential services for internally displaced persons and returnees at the community level - Council of Europe Office in Ukraine", a series of legal awareness webinars for Ukrainians in European and North American countries was organised, as well as monitoring visits. Between May and November 2025, the Commissioner's Secretariat held 12 legal awareness webinars for Ukrainians in the Republic of Poland, the Federal Republic of Germany, Canada, the Kingdom of Spain, the Kingdom of Belgium, the Kingdom of the Netherlands, the Portuguese Republic, the Italian Republic, the Slovak Republic, the Czech Republic, the United Kingdom of Great Britain and Northern Ireland and Ireland. At the same time, monitoring visits were held to the Republic of Austria, the Kingdom of Norway, the Republic of Finland, the Swiss Confederation, the Federal Republic of Germany and the Italian Republic. In total, more than 1,000 people took part in the webinars, including Ukrainian citizens living abroad, representatives of civil society organisations, diaspora associations, experts and government bodies.

Purpose and limitations of the policy brief

The purpose of this brief is to summarise the main problems faced by Ukrainian citizens abroad in accessing public services, including consular, administrative, pension and social ones, as well as to develop practical recommendations to make state policy in this area more effective. Special emphasis is placed on analysing these issues in the broader context of the end of the temporary protection period and the need to adapt mechanisms of state support for Ukrainians abroad and returnees.

The findings are based on questions and feedback received from webinar participants, observations during monitoring visits and official clarifications from government agencies provided during these events. The brief does not claim to cover all countries where Ukrainians reside⁶, instead focusing on the most typical and systemic challenges that are relevant to the development of state policy on access to services abroad. Certain aspects, such as school education for children abroad, were not discussed during the webinars. They were only included in the analysis of secondary sources.

5. Ukrainian Parliament Commissioner for Human Rights. Analytical report "Forced Displacement Abroad". Kyiv: Office of the Ukrainian Parliament Commissioner for Human Rights, 2025. URL: <https://www.ombudsman.gov.ua/storage/app/media/uploaded-files/forced-displacement-abroadv1-1.pdf>

6. Among other things, the brief does not address the issues and problems that Ukrainians may have in the United States of America (USA), where no visits or webinars were held.

7. The topics of the webinars were determined based on the most common requests received by the Commissioner's Secretariat from Ukrainian citizens temporarily residing outside Ukraine.

**TEMPORARY
PROTECTION:
CURRENT TRENDS
IN MAJOR HOST
COUNTRIES AND EXIT
SCENARIOS**

Since Russia launched its full-scale invasion of Ukraine in 2022, more than 5.88 million Ukrainian citizens have been living abroad, benefiting from various forms of temporary or humanitarian protection⁸. In the fourth year of various types of temporary protection or similar mechanisms, more and more countries are moving away from the general, blanket approach to providing protection, where all Ukrainian citizens are automatically recognised as needing asylum. There is instead a growing trend towards individualised assessment, which assumes that certain regions of Ukraine are currently considered relatively safe, and therefore internal displacement or return is possible without significant threat to life or persecution. This evolution of policies indicates a gradual shift from a purely humanitarian logic to a managed migration response model.

European countries implementing temporary protection mechanisms⁹

Introduced by Directive 2001/55/EC¹⁰, the temporary protection regime was activated by the Council of the EU on 4 March 2022 in response to Russia's full-scale invasion of Ukraine. This mechanism enabled Member States to quickly grant Ukrainians legal residence status, access to the labour market, housing, education and healthcare services without the need for asylum procedures. In June 2025, the regime was officially extended until 4 March 2027¹¹.

Statistics: numbers, dynamics, demographic profile

As of late September 2025, there were approximately 4.39 million people from Ukraine residing in countries within the European Economic Area and Schengen Area who were granted temporary protection status¹².

In 2025, a moderate increase in their number was recorded: in May, the number of people increased by 10.8 thousand people (+0.3%), mainly due to Germany, the Czech Republic and Spain, while Bulgaria, France and Slovakia saw a decline. These fluctuations likely reflect the internal mobility of beneficiaries within the EU. In September 2025, 79,205 new decisions on granting temporary protection were issued — 49% more than in August, marking the highest figure in two years¹³. The increase is likely due to the decision of the Government of Ukraine in late August 2025, which allowed men aged 18 to 22 to travel abroad, which led to an increase in new applications¹⁴.

The main share of recipients of temporary protection is concentrated in a few countries, which together accepted more than half of all persons who left Ukraine: Germany (28%), Poland (24%) and the Czech Republic (9%).

8. UN High Commissioner for Refugees (UNHCR). Portal of operational data on Ukraine refugee situation. URL: <https://data.unhcr.org/en/situations/ukraine> (Last accessed: 16 November 2025).

9. Directive 2001/55/EC on temporary protection applies exclusively in EU Member States. However, a number of countries that are not members of the EU but are part of the European Economic Area or Schengen Area (including Norway, Iceland, Liechtenstein and Switzerland) have implemented national mechanisms consistent with the principles of the Directive, providing a similar level of protection for Ukrainian citizens.

10. Council Directive 2001/55/EC 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. URL: <https://eur-lex.europa.eu/eli/dir/2001/55/oj/eng>.

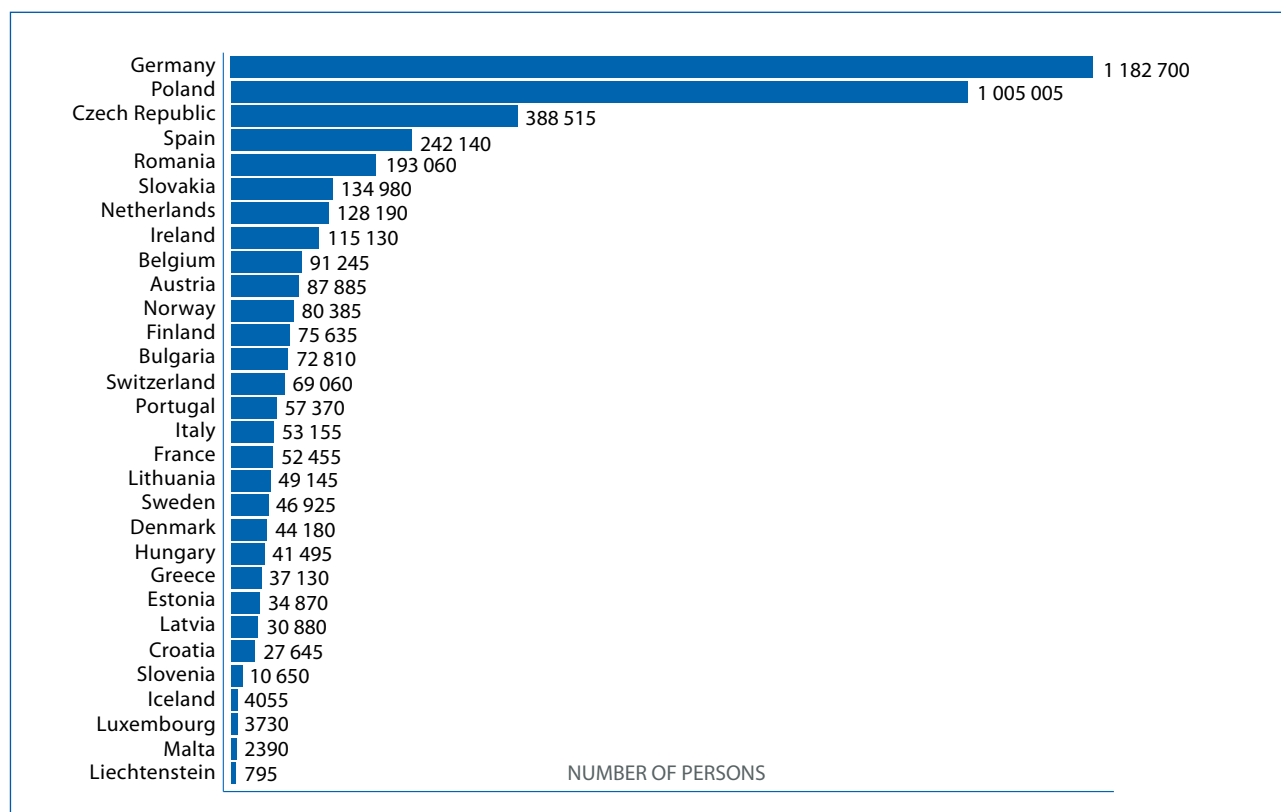
11. Council of the European Union. (2025). EU member states agree to extend temporary protection for refugees from Ukraine. URL: <https://www.consilium.europa.eu/en/press/press-releases/2025/06/13/eu-member-states-agree-to-extend-temporary-protection-for-refugees-from-ukraine/>

12. Eurostat. (n.d.). Beneficiaries of temporary protection at the end of the month by citizenship, age and sex – monthly data (data code: MIGR_ASYTPSM). URL: https://ec.europa.eu/eurostat/databrowser/view/migr_asytpsm_custom_18835195/default/table

13. Eurostat. (10 November 2025). Temporary protection decisions highest in 2 years. URL: <https://www.consilium.europa.eu/en/press/press-releases/2025/06/13/eu-member-states-agree-to-extend-temporary-protection-for-refugees-from-ukraine/>

14. Cabinet of Ministers of Ukraine. (26 August 2025). Resolution 1031 "On Amendments to the Rules for Crossing the State Border by Citizens of Ukraine". URL: <https://zakon.rada.gov.ua/go/1031-2025-%D0%BF>

Number of Ukrainian citizens with the temporary protection status, as of the end of September 2025 (Eurostat)



Temporary protection: current political discussions in the EU on the exit strategy

Today, temporary protection is positioned in EU countries as a mechanism that requires planning for a phase-out. Article 4 of the Directive stipulates that the mechanism is valid for a maximum period of three years, and currently, the temporary protection is in fact exceeding its initial scope¹⁵.

Starting from 2024, more and more countries are introducing restrictions on the admission of new refugees from Ukraine. For example:

- In January 2025, Norway stopped automatically granting collective protection to residents of 14 regions in the central and western parts of Ukraine, declaring them “relatively safe” and referring such applicants to individual asylum procedures¹⁶;
- From 1 November 2025, Switzerland has also switched to a selective approach to granting temporary protection, reserving it only for persons who lived in areas of active hostilities or occupied territories¹⁷;
- Several countries (the Czech Republic, Poland, Switzerland, Norway) no longer grant temporary re-protection: Ukrainians who have already used this status in one state cannot obtain it again¹⁸.

15. Platform for International Cooperation on Undocumented Migrants. (4 March 2025). Three years since the activation of the Temporary Protection Directive: from emergency to longer-term solutions. URL: <https://www.picum.org/blog/three-years-since-the-activation-of-the-temporary-protection-directive-from-emergency-to-longer-term-solutions/>

16. Directorate of Immigration (UDI). (2025, 13 January). More areas excluded from the right to collective protection. URL: <https://www.udi.no/en/important-messages/more-areas-excluded-from-the-right-to-collective-protection/>

17. State Secretariat for Migration SEM. Protection status S to remain in place, but new regulation for seven Ukrainian regions. URL: <https://www.sem.admin.ch/sem/en/home/asyl/ukraine/regelung.html>

18. Visit Ukraine. In which EU countries you can get re-protection in 2025 (conditions and required documents). URL: https://visitukraine.today/uk/blog/3548/in-which-eu-countries-you-can-get-re-protection-in-2025-conditions-and-required-documents?srltid=AfmBOqnTduv0mzc-E_PjYqITBsYvnUJCPeStlv6tGZGkKssbjPauFnc#otrimannya-timcasovogo-zaxistu-pislya-perebuvannya-v-insii-krayini-jes

Thus, temporary protection is no longer universal and increasingly depends on the geographical origin, individual vulnerability and previous legal status of applicants.

With regard to planning the phase-out for those who already have temporary protection, in 2025, the Council of the EU adopted a Recommendation on a coordinated approach to the transition out of temporary protection for displaced persons from Ukraine¹⁹, in order to avoid a legal vacuum after March 2027 and prevent a large number of persons with unregulated status. At the same time, most countries have not yet introduced special transitional mechanisms, providing that beneficiaries of protection should switch to general residence permits. One exception is Poland, which has adopted a law on three-year residence permits (CUKR card) for Ukrainians who have been in the country for more than a year, regardless of their employment²⁰. Similar mechanisms have been developed or are currently being developed in Czechia, Italy, and Germany.

Some European countries have introduced support programmes for those who wish to voluntarily return to Ukraine (e.g., in the Czech Republic, the Netherlands)²¹.

Protection and support for Ukrainian citizens in countries outside the EU: the UK, Canada and the USA

Outside the European Union, the governments of several countries, including the United Kingdom, Canada and the United States of America (USA), are implementing programmes similar to temporary protection mechanisms that provide Ukrainians with the right to legal residence, employment and access to social services. In the UK, there are about 217 thousand people²², living under the Ukraine Family Scheme and Homes for Ukraine scheme, and the validity of their permits has been extended until 2028²³. In Canada, there are about 300 thousand people under the Canada-Ukraine Authorisation for Emergency Travel programme²⁴, with open work permits valid until 2026. In the USA, there are about 187 thousand Ukrainians living under the Uniting for Ukraine programme²⁵, and their temporary residence permit has been extended until April 2026. In general, similarly to EU countries, there is a trend towards the gradual phasing out of emergency protection regimes and a transition to stabilisation forms of residence: governments extend existing permits for those who have already arrived, but do not open new programmes, focusing on the integration of Ukrainians into host societies.

19. Council of the European Union. Council Recommendation on a coordinated approach to the transition out of temporary protection for displaced persons from Ukraine (ST 12015/2025 – INIT). Brussels: Council of the European Union, 8 September 2025. URL: <https://data.consilium.europa.eu/doc/document/ST-12015-2025-INIT/en/pdf>

20. Urząd do Spraw Cudzoziemców (Office for Foreigners of the Republic of Poland). Informacja w sprawie wniosków o wydanie tzw. karty pobytu CUKR. URL: <https://www.gov.pl/web/udsc/informacja-w-sprawie-wnioskow-o-wydanie-tzw-karty-pobytu-cukr>

21. Voluntary return: an overview of policies and practices. URL: <https://rm.coe.int/voluntary-return-overview-july-2025/488028edbf>

22. House of Commons Library. Adjournment debate on Homes for Ukraine and the Ukraine Permission Extension Scheme (Research Briefing CDP 2025-0168). London: House of Commons, 17 July 2025. Available at: <https://commonslibrary.parliament.uk/research-briefings/cdp-2025-0168/>

23. UK Visas & Immigration (Home Office). Applying to the Ukraine Permission Extension scheme. GOV.UK. Published 26 November 2024, last updated 11 November 2025. Available at: <https://www.gov.uk/guidance/applying-to-the-ukraine-permission-extension-scheme>

24. Immigration, Refugees and Citizenship Canada. Canada extends some temporary measures for Ukrainians. Government of Canada, 27 February 2025. URL: <https://www.canada.ca/en/immigration-refugees-citizenship/news/2025/02/canada-extends-some-temporary-measures-for-ukrainians.html>

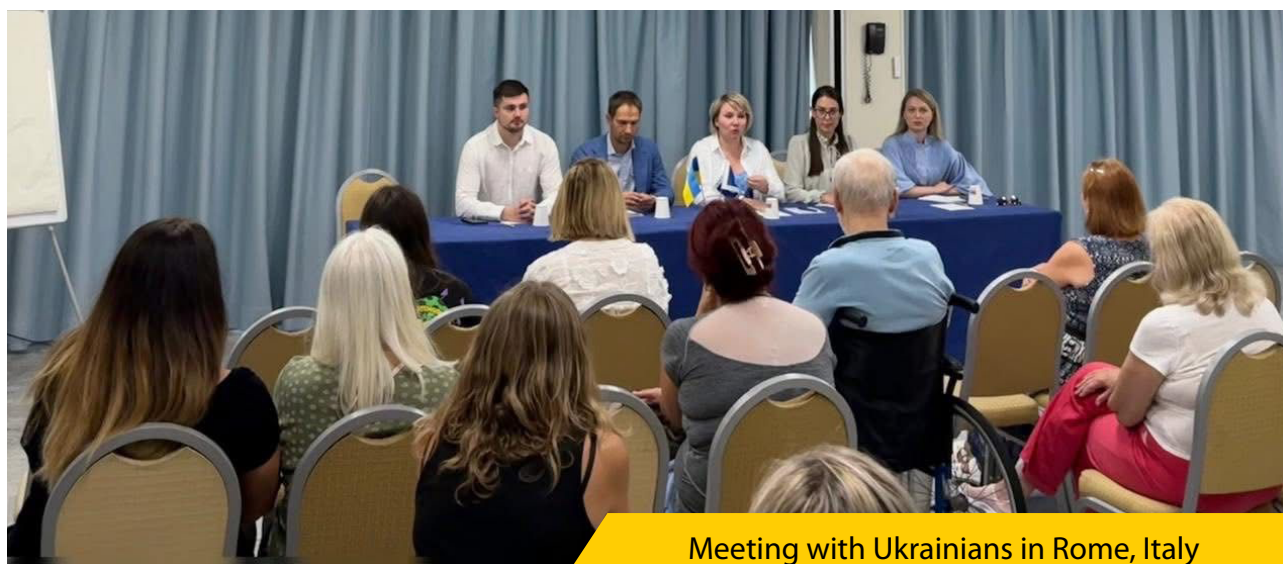
25. NBC Connecticut. "What to know about the 'Uniting for Ukraine' program in US." 24 February 2025. Available at: <https://www.nbcconnecticut.com/news/local/what-to-know-about-the-uniting-for-ukraine-program-in-us/3505740/>

Possible return scenarios

In the context of these processes — phasing out temporary protection, narrowing the criteria for its granting and the emphasis on the integration of Ukrainians in host countries — the issue of their potential return to Ukraine is becoming increasingly relevant. According to various analytical reports^{26, 27}, a large-scale return of Ukrainians should not be expected before 2027. Return remains limited due to a combination of several interrelated factors. These primarily include the adaptation of a significant number of Ukrainians in their host countries, the extension of temporary protection regimes, as well as high security and economic risks existing in Ukraine.

Obviously, the decisive factor that will determine the scale of return is the progress of the war and the extent of security stabilisation in Ukraine. In a scenario where hostilities continue until 2028, with the intensity of attacks remaining the same or even increasing, the return will be minimal: according to models developed by UNHCR and Brunel University²⁸, their number could be around 266,000 people in 2025–2028. However, in case of de-escalation or end of active hostilities, regardless of whether it will be due to Ukraine's victory, political compromise or gradual easing of hostilities, a significant increase in the number of returnees is expected. The most optimistic estimates suggest that their number could reach approximately 2.8 million by the end of 2028.

The Brunel University study also shows that older people who own non-destroyed property in Ukraine are most likely to return. In contrast, Ukrainians employed abroad are less likely to return: according to UNHCR, about 73% of those planning to return were not involved in the employment market before leaving. In addition, the returns are not expected to be evenly distributed across the country, as approximately 38% of potential returnees may settle in



Meeting with Ukrainians in Rome, Italy

26. UNHCR. Policy Brief: Forecasting refugee return to Ukraine amid ongoing war and uncertainty (Doc. No. 117421). URL: https://data.unhcr.org/en/documents/details/117421?_gl=1*183vf87*_gcl_au*OTYxNzY0MjgwLjE3NDY2MjYzMjU.*_rup_ga*MTg2Mjk3NTQ2LjE3NDY1NTg1MTg.*_rup_ga_EVDQTJ4LMY*cE3NTixNTA3MTEkbzgwJGcxJHQxNzUyMTUyMjMxJGo2MCRsMCRoMA..*_ga*MTg2Mjk3NTQ2LjE3NDY1NTg1MTg.*_ga_X5VF-GG5PY9*cE3NTixNTA3MTEkbzkkZzEkdDE3NTixNTIvMzlkaiYwJGwwJGww

27. National Bank of Ukraine. (2025). Inflation report. 2025 Q3 (IR_2025-Q3). URL: [IR_2025-Q3_eng.pdf](#)

28. UNHCR. (2025). Policy Brief: Forecasting refugee return to Ukraine amid ongoing war and uncertainty (Doc. No. 117421). URL: <https://data.unhcr.org/en/documents/details/117421>

regions other than their home regions, mainly due to the destruction or lack of housing and fears of a new escalation of the conflict.

Coordination of returns by the Government of Ukraine

Despite the growing attention to the problem of demographic recovery, the rhetoric of the Government of Ukraine regarding the return of citizens from abroad still remains largely declarative. It is not backed up by systemic institutional mechanisms or specialised programmes aimed at encouraging return or reintegration. As indicated in Ukraine's Demographic Development Strategy until 2040²⁹, return migration is considered one of the areas of state policy aimed at overcoming depopulation trends and renewing the workforce. That said, the document contains no operational goals, clear performance indicators or a designated responsible body, which shows a lack of an integrated approach to planning return policy.

Following the reorganisation of the Ministry of National Unity of Ukraine (formerly the Ministry of Reintegration of Temporarily Occupied Territories) in 2025, its powers regarding internal displacement and return were transferred to the Ministry of Social Policy, Family and Unity of Ukraine, which now plays a key role in shaping policy on support for internally displaced persons and Ukrainian citizens abroad. The Ministry of Social Policy has recently announced that it is working on a National Strategy for the Return and Reintegration of Ukrainians from Abroad, which is to be completed by the end of 2025³⁰.



Meeting with Ukrainians in Oslo, Norway

29. Cabinet of Ministers of Ukraine. (2024, September 30). Order No. 922-r: On the Approval of the Demographic Development Strategy of Ukraine for the Period up to 2040. Kyiv.

URL: <https://zakon.rada.gov.ua/laws/show/922-2024-%D1%80>

30. Interfax-Ukraine. Uliutin: Ministry of Social Policy is working on a Strategy for the Return of Citizens from Abroad to Ukraine.

URL: <https://interfax.com.ua/news/general/1115230.html>

**CURRENT
PROBLEMS
OF ACCESS TO
GOVERNMENT
SERVICES
ABROAD**

Having analysed individual appeals from citizens abroad, the Commissioner's Secretariat organised a series of webinars aimed at raising legal awareness and identifying the main difficulties faced by Ukrainians abroad when accessing public services. This section presents a summary of the issues raised by webinar participants in the areas of consular, social, pension and other administrative services and outlines the most common challenges faced by Ukrainian nationals abroad in their interactions with the state of Ukraine.

Consular services and functioning of foreign diplomatic missions

Typical services that Ukrainians abroad seek from consular offices include: issuing passports for travel abroad, notarial acts (powers of attorney, statements, etc.), and requesting civil status documents.

Since the outset of the full-scale invasion, one of the key organisational challenges has been the high workload on Ukrainian consular institutions abroad. Based on discussions held at webinars and monitoring visits, people mentioned having a hard time getting into the appointment booking system and limited options for getting consular services in a timely manner. In most countries where webinars were held, the consular section employs only a few staff members, usually two or three, which greatly hinders the processing of a large number of applicants, both new arrivals and those who had been living in these countries before the displacement began. These problems are particularly acute in large or geographically remote countries, such as Canada, where there are no offices of the State Enterprise "Document" and access to services often involves long and costly trips to consulates.

In response to the growing workload on consular institutions, the Ministry of Foreign Affairs of Ukraine (MFA) has introduced an electronic queue as a basic tool for managing appointments. It is part of the e-Consul system and is designed to allow to make advance appointments for personal visits to the consulate. At the same time, the e-Consul system is not limited to electronic queuing. It is further designed to digitise the provision of certain administrative services (e.g. notary services).



Meeting with Ukrainians in Sarpsborg, Norway

Based on information collected during webinars and monitoring visits, most consular offices open appointments six months in advance, and all available time slots are usually filled within the first few days after opening. Applicants can either reserve a distant appointment date or join a waiting list in case a vacancy arises due to another person cancelling or failing to confirm their appointment. This format raises considerable dissatisfaction among users, who consider the system to be inaccessible and non-transparent, given that the services citizens seek are often urgent and they cannot wait for six months. Another issue raised during the webinars and monitoring visits was that authorisation for registration requires a biometric passport, the Diia application or ID-bank, which creates an additional digital barrier for citizens who do not have biometric documents or a bank account in Ukraine.

According to both service recipients and the MFA, cyber fraud related to the electronic queue is currently a widespread problem. Unidentified intermediaries offer Ukrainians paid services for “consulate appointments”, using the electronic keys and digital signatures of trusting individuals to book slots in bulk. According to statements by the MFA and foreign diplomatic missions during webinars and monitoring visits, to counter these schemes, the MFA cooperates with the Cyber Police and the National Police of Ukraine, monitors online platforms and regularly raises public awareness about the risks of using intermediary services.

Alongside the main electronic appointment system, some consular offices have introduced a walk-in mechanism for certain categories of citizens who are considered to be vulnerable. However, according to webinars and monitoring visits, this mechanism remains inconsistent in its application, as there are no clearly defined rules governing the procedure and criteria for access. Representatives of consulates, including those in the Federal Republic of Germany, confirmed that there is a systemic problem with the electronic queue for military personnel undergoing treatment or rehabilitation abroad: in the absence of a separate category, such persons are forced to wait in the general queue.

Another contentious issue during the discussion was the effectiveness of e-Consul as a platform for providing online services. In the summer of 2025, the MFA introduced automated notarial services that allow users to upload documents, select templates and draft notary documents online. According to the MFA, this cut down on the number of visits to the consulate, reduced the average service time to 5–7 minutes when receiving documents, and let staff focus on more complex procedures, such as issuing passports. At the same time, webinar participants indicated that they are unable to register for these services, while they require the documents urgently. Consequently, they are turning to private notaries to obtain these services for a fee.

The role of the State Enterprise “Document” in providing services abroad

Following the onset of the full-scale invasion, the State Migration Service of Ukraine expanded the activities of the SE “Document” by opening a number of its offices in European Union countries. This decision has enabled consular offices to reduce their workload, particularly in terms of processing passport documents. In the first months of the war, a significant number of citizens left Ukraine without foreign travel passports, which led to a pressing need to obtain documents abroad. As of 2025, the situation has slowly stabilised: the demand for passport processing has decreased, while still remaining high.

Participants in webinars and monitoring visits have repeatedly indicated that the offices of the SE “Document” are unevenly distributed. These offices are already operating in the EU countries (namely, in Poland, the Czech Republic, Germany, Spain, Italy, Bulgaria and Moldova), while in a number of other European countries (such as the UK, Ireland,

the Scandinavian countries) Ukrainians have to travel to neighbouring states to use the services. The situation remains particularly challenging in Canada and some other overseas countries, where there are no branches of the SE “Document”, and all the workload related to passport documents falls on consular offices.

The participants of the webinars have repeatedly appealed to the Government to expand the geography of the SE “Document”, notably in countries with a large Ukrainian community outside the EU.

Appointment and renewal of pension payments and social benefits

Pensions

Following the findings of webinars and monitoring visits, the main difficulties associated with the appointment, renewal or receipt of pension payments by Ukrainians living abroad are mainly of an informational nature. A significant part of the participants were not aware of the legal consequences of not undergoing identification, which can cause the temporary suspension of payments. However, this procedure may legally be done remotely from outside Ukraine. According to the current procedure, pensioners can pass identification in one of three ways: through the web portal of electronic services of the Pension Fund of Ukraine (PFU) using a qualified electronic signature (QES) or Diia.Signature; via a video conference with an authorised employee of the PFU; by personally applying to a consular institution of Ukraine to issue a document confirming that the person is alive.

In practice, access to these methods remains uneven. Some elderly people do not have a QES or the technical ability to use digital services, while consular offices are limited in terms of staff resources and cannot quickly confirm that a person is alive. This leads to a temporary suspension of pension payments, and renewing them can take several months or even years. As a working solution, the PFU recommends passing identification via video conference, which does not require a QES or Diia.Signature and is accessible to most pensioners. However, in some complex cases, renewing pensions may still require a face-to-face appointment, according to the PFU.

At the same time, for persons who have moved abroad before reaching retirement age, a remote pension can only be granted if they have a QES.

Another difficulty is the recognition of work experience gained outside Ukraine. As of 2025, Ukraine has bilateral social security agreements in force with a limited number of countries (mostly the Commonwealth of Independent States and Central European states). These agreements enable the mutual recognition of pensionable service periods for the purpose of determining eligibility for a pension. Such agreements have not yet been concluded with most EU countries, nor with the UK and Canada.

However, in 2025, the PFU introduced regulatory clarifications to the procedures for recording pensionable service, allowing data on work abroad to be taken into account, provided that it is documented, even in the absence of a bilateral agreement. This is used solely to determine eligibility for a pension. The amount of the pension is calculated only for the period of service acquired in Ukraine.

The PFU also underlines that a comprehensive solution to the issue of mutual recognition of pensionable service is only possible through intergovernmental agreements. These processes are subject to political decisions, intergovernmental negotiations and coordination with the competent social security authorities of other countries, and therefore their implementation is a long-term prospect.

A separate issue raised by Ukrainian citizens abroad concerned the right to temporarily refuse to receive pension payments. In a number of countries, receiving a Ukrainian pension may affect the scope of social assistance or benefits provided by the host country, which is why some citizens have expressed a desire to suspend their pension payments at their own request. In response to such appeals, amendments were made to the Law of Ukraine “On Mandatory State Pension Insurance” that supplemented Article 49, giving pensioners the right to suspend receiving pension payments at their own request for the period of temporary residence abroad.

Social benefits

During webinars and monitoring visits, citizens abroad raised a number of issues related to the payment of social benefits. According to Resolution 641 of the Cabinet of Ministers of Ukraine dated 30 June 2023, as amended, effective 1 July 2025, the PFU became a designated authority for assigning, paying, and monitoring the provision of social benefits. The discussions revealed that the transition phase is fraught with organisational difficulties, particularly due to the gradual digitisation of processes:

- Lack of an online service for submitting applications at the initial stage: at the time of the webinars and monitoring visits, the service was in the beta testing stage;
- The PFU databases are incomplete: since social protection agencies were decentralised and due to the temporary occupation, the PFU database lacks complete information on all benefit recipients, especially those who received payments based on special resolutions.

It was also noted that childbirth assistance (the so-called “baby package”), delegated to the PFU for administration, has not yet been integrated into the e-Consul system. Its provision abroad requires additional changes to laws and regulations, as well as the coordination of procedures between the MFA, the Ministry of Social Policy, Family and Unity and the PFU.

Recognition of disability documents and disability registration

Yet another issue raised during webinars and monitoring visits was the re-registration of disability by Ukrainians abroad. In Ukraine, disability is usually established for a specific period, after which the individual must undergo a reassessment to confirm or change their disability category. For many citizens who have been forced to leave the country, this poses significant difficulties, as the procedure traditionally required personal attendance at the medical and social expert commission (MSEC). Following the reform that came into effect on 1 January 2025, these commissions were abolished and their functions transferred to newly established expert teams at healthcare institutions that assess the level of functioning of individuals. Moreover, the process has been digitised, and the new rules provide for the option of remote or distance assessment, but the procedure for its application to citizens abroad remains unclear.

During webinars and monitoring visits, citizens most often asked how medical documents from abroad could be transferred to Ukrainian institutions, whether foreign medical certificates were recognised, and how documents were translated and legalised. Citizens located in countries without intergovernmental social security agreements (e.g., Germany, Italy, Portugal, the UK) reported difficulties with remote confirmation, lack of access to

Ukrainian doctors and the risk of losing their status due to the inability to physically attend a reassessment. The situation is especially tricky for injured military personnel who are getting treatment abroad, in case they need remote confirmation of the reasons for their disability. In general, participants insisted on the need for clear official explanations, unified procedures and interagency coordination between the Ministry of Health (MOH), the MFA and the PFU, which would allow people with disabilities to exercise their rights regardless of their place of residence.

Recognition of education certificates

During the series of webinars and monitoring visits, a special focus was placed on the recognition of Ukrainian degrees and qualifications in host countries, primarily in EU member states. Although this issue was not brought up in every webinar, it is important in the context of access to decent employment in destination countries and preventing the loss of skills during displacement.

Among the key characteristics of Ukrainian refugees' employment in Europe is marked deskilling, i.e. employment in positions that do not correspond to their level of education or previous professional qualifications. According to a survey of refugees conducted by Impact Initiatives in Poland in April and May 2025³¹, among the same cohort of Ukrainians who left due to the full-scale invasion and were staying in Poland as of April 2025, the share of those employed in the lowest-skilled jobs increased from 5% before displacement to 48% after displacement. A similar trend can be observed in other EU countries.³² There are multiple factors behind this phenomenon. First and foremost, language barriers remain the main obstacle to finding employment in the relevant field. At the same time, the non-recognition of Ukrainian degrees or the complicated recognition procedures exacerbate the effect of deskilling, especially in fields with high standards for admission to the profession, such as medicine, pharmacy or engineering.

Difficulties in recognition are caused by a number of institutional and regulatory factors, including: differences between national education systems, varying lengths of study, inconsistencies in curricula and accreditation criteria and the lack of a common approach to regulated professions. Although Ukraine is a party to the Lisbon Convention on the Recognition of Qualifications concerning Higher Education in the European Region (1997), the practical implementation of its principles is left to the discretion of each individual state. Consequently, the process of recognising Ukrainian degrees is decentralised and depends on the national legislation of the host country, which significantly limits Ukraine's ability to influence these procedures at the intergovernmental level. The Ministry of Education and Science of Ukraine, through the National Information Centre for Academic Mobility (ENIC Ukraine), primarily serves a coordinating and awareness-raising function: it provides advice, confirms the authenticity of documents, affixes apostilles and facilitates communication with the network of European recognition centres. Still, the influence of the Ministry of Education and Science on national recognition procedures in host countries remains limited, which highlights the need to strengthen educational diplomacy, develop international partnerships and expand cooperation aimed at the recognition of qualifications.

31. IMPACT Initiatives. (2025). Longitudinal Situation Overview: Ukrainian women in Poland. URL: https://repository.impact-initiatives.org/document/impact/afc76776/IMPACT_Longitudinal_Situation_Overview_Ukrainian_women_in_Poland-1.pdf

32. Although it also depends on the national policy of each country. For instance, in Germany, this trend is not as pronounced due to the German Government's different approach to integration: see IMPACT Initiatives. Situation overview. Housing, language and employment: Are Ukrainian refugees finding a stable footing in Germany in the third year of the full-scale invasion? Longitudinal study of Ukrainian refugees, Round 25. 2024. URL: https://repository.impact-initiatives.org/document/impact/6baece0d/IMPACT_Longitudinal_Situation_Overview_R25_refugees_from-Ukraine_in_Germany.pdf

As per the questions asked during webinars and monitoring visits, for most Ukrainians abroad, the key challenges remain the need for information, limited access to documents due to martial law, differences in the structure of educational cycles and a lack of advisory and digital services from Ukrainian institutions.

Access to the secondary education

According to various estimates³³, from 568,000 to 859,000 school-age children who left due to the war live outside Ukraine as of the beginning of 2025. According to estimates by the Institute of Educational Analytics,³⁴ approximately 356,000 of them remain enrolled in Ukrainian educational institutions and continue their studies in a distance or hybrid format. A large number of children are simultaneously enrolled in schools in their host countries, following local curricula, and in Ukrainian institutions through distance learning.

According to UNHCR's regional socio-economic survey of refugee children in Europe³⁵, 79% of refugee children from Ukraine in Europe receive formal education in their host country. Of these, approximately 50% study exclusively in schools in the host country, 29% combine study in the host country with distance learning under the Ukrainian curriculum, 16% study only remotely under the Ukrainian curriculum, and 6% are not enrolled in any educational programme.

The situation regarding children residing in the temporarily occupied territories of Ukraine has been separately investigated and presented in the Special Report of the Ukrainian Parliament Commissioner for Human Rights on Access to Education for Children and Youth from the Temporarily Occupied Territories of Ukraine³⁶.

The main challenges in secondary education for children living abroad remain maintaining educational ties with the Ukrainian system, harmonising curricula and ensuring the possibility of a smooth re-entry into Ukrainian schools in the future. Although this topic was not specifically discussed during the webinars and monitoring visits, some parents and teachers raised a number of practical issues that reflect these systemic challenges. The most frequent questions concerned combining local school education with distance learning under the Ukrainian curriculum without overburdening children; whether grades and years of study abroad would be recognised upon return to Ukraine; and how to obtain a Ukrainian education certificate if a child is studying remotely or partially outside the country.

33. UNHCR. (2025). Education of refugee children and youth from Ukraine: An analysis of major trends and challenges in education of refugees from Ukraine in Europe (Document No. 115988). URL: <https://data.unhcr.org/en/documents/details/115988>

34. Horbachov, S. Nearly 356,000 Ukrainian children are studying at two schools simultaneously: remotely in Ukraine and face-to-face abroad. Ministry of Education and Science of Ukraine. New Ukrainian School, 5 February 2025. URL: <https://nus.org.ua/2025/02/05/majzhe-356-tysyach-ukrayinskyh-ditej-navchayetsya-odnochasno-u-dvoh-shkolah-dystantsijno-v-ukrayinskij-i-ochno-za-kordonom-mon/>

35. UNHCR. (2025). Education of refugee children and youth from Ukraine: An analysis of major trends and challenges in education of refugees from Ukraine in Europe (Document No. 115988). URL: <https://data.unhcr.org/en/documents/details/115988>

36. Special Report of the Ukrainian Parliament Commissioner for Human Rights on Access to Education for Children and Youth from the Temporarily Occupied Territories of Ukraine. URL: <https://ombudsman.gov.ua/uk/shchorichni-ta-specialni-dopovidj>

CONCLUSIONS AND RECOMMENDATIONS

Analysis, based on webinars and foreign visits by representatives of the Commissioner's Secretariat indicates that Ukraine's state policy towards its citizens living abroad remains fragmented and unsystematic. The response has been predominantly reactive — decision-making on a case-by-case basis in response to emerging challenges or individual appeals, without a comprehensive long-term strategy. The lack of a coordinated and strategic approach becomes particularly problematic in light of the expected end of the temporary protection regime for Ukrainians in 2027.

At the level of consular services, the system experiences chronic overload due to a high concentration of requests in main countries hosting Ukrainian refugees. The social protection sector continues to face technical and organisational challenges related to incomplete digitisation of processes. Access to pensions is better regulated, but still requires active information dissemination and explanations to a wide range of citizens. The field of education exhibits flexibility, but also structural uncertainty. While most Ukrainian children attend schools in their host countries, the mechanisms for recognising their educational achievements remain unregulated. This creates a double burden on children and teachers, as they must follow both local and Ukrainian curricula, and poses risks to the continuity of the educational process in the case of return to Ukraine. There are similar issues with the recognition of Ukrainian degrees and qualifications: despite the existence of the National Information Centre for Academic Mobility, their recognition and access to information are still quite problematic. In healthcare, especially with regard to establishing and confirming disability, the reform introduced in 2025 has created new opportunities, but the procedure for its remote application is still undefined. This prevents persons with disabilities from confirming their status in a timely manner, which directly affects their access to social benefits.

The overall picture suggests that, despite progress in digitisation and reforming certain areas, the state system for engaging with Ukrainians abroad remains reactive, fragmented and insufficiently integrated. The expected end of temporary or humanitarian protection in 2027–2028 further emphasises the need to develop a systematic return policy, consular support and long-term engagement with Ukrainians abroad.

Recommendations of the Ukrainian Parliament Commissioner for Human Rights

On determining policy on engagement with Ukrainian citizens abroad and their Return.

The Cabinet of Ministers of Ukraine should:

1. Resume the work and ensure the practical implementation of the functions of the Working Group on the Protection of the Rights and Freedoms of Ukrainian Citizens Temporarily Displaced Persons in the Territory of EU Member States and Other States, approved by Resolution of the Cabinet of Ministers No. 425 dated 9 April 2022; include representatives of international organisations and the civil society in the Working Group.
2. Approve a national strategy for the protection of the rights and freedoms of persons forced to leave Ukraine and move abroad, as well as the creation of necessary conditions for their return to Ukraine, and an action plan for implementing this strategy.

The Ministry of Social Policy, Family and Unity of Ukraine should:

1. Develop a national strategy for the protection of the rights and freedoms of persons forced to leave Ukraine and move abroad, as well as the creation of necessary conditions for their return to Ukraine and submit it to the Cabinet of Ministers for consideration.

On issues related to citizens' access to public services abroad.**The Ministry of Foreign Affairs of Ukraine should:**

1. Continue the digitalisation of consular services through the e-Consul platform, ensuring its integration with the passport system and other state registries, as well as expanding user identification mechanisms. In particular, provide alternative authorisation methods for citizens who do not have ID cards or lack access to the DIIA mobile application or Ukrainian mobile banking.
2. Initiate cooperation with the State Tax Service to create a service for obtaining a taxpayer registration number online, since citizens cannot access most consular services without it.
3. Strengthen the staffing capacity of consular institutions by providing additional positions for technical and administrative staff.
4. Increase the number of consular staff in the busiest consulates, primarily in Germany, Poland and Canada.
5. Continue the practice of field consular visits, especially in large or remote countries where Ukrainians reside.
6. Link the opening times of slots to the local time of the country of residence to avoid unequal access.
7. Launch awareness-raising campaigns to explain the risks of transferring electronic keys or signatures to third parties, emphasising that this poses a threat of fraud and abuse.
8. Conduct awareness-raising campaigns on the procedure for obtaining consular services in destination countries.

The Ministry of Social Policy, Family and Unity of Ukraine and the Pension Fund of Ukraine should:

1. Launch awareness-raising campaigns for Ukrainians abroad on exercising their right to pension benefits, including remote identification options, the procedure for assigning or renewing pensions, rules for paying insurance contributions, crediting insurance experience and mechanisms for receiving payments outside Ukraine.
2. Develop digital cooperation and electronic document exchange with countries with which social security agreements have been concluded, in order to cut down on time and simplify pension assignment procedures.

The Ministry of Education and Science of Ukraine should:

1. Strengthen cooperation with educational authorities of host countries in order to harmonise approaches to the education of Ukrainian children, exchange data on their involvement in the education system and adapt curricula.
2. Create a single online information portal with interactive instructions on degree recognition procedures in different countries, document templates, links to national ENIC/NARIC centres and advisory support.

The Ministry of Health of Ukraine should:

1. Launch awareness-raising campaigns for Ukrainians abroad on the procedure for confirming the disability status of persons residing abroad.



Омбудсман України
Ombudsman of Ukraine

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE