Regional Refugee Response for the Ukraine Situation

Protection Working Group (PWG)
Comments on Implementation of Temporary Protection
(7 July 2023)

I. Introduction

On 1 March 2023, the legal status of Temporary Protection (TP) became available to the 103,200 Ukrainian nationals who had fled the armed conflict in Ukraine and had been residing in the Republic of Moldova, as well as to certain third country nationals, in particular those benefitting from international protection as refugees or stateless persons in Ukraine. The TP legal regime was approved by Government Decision 21/2023, issued on 18 January 2023. While TP has long existed as a possible legal status under the Law on Asylum in Moldova (Law No.270/2008), this was the first time the TP regime was activated and implemented in practice. As such, and as expected, implementation has been a "learning process" for all, as government officials, service providers, humanitarian partners, refugees and members of the host community adapt to emerging issues.

The Protection Working Group (PWG) of the Refugee Coordination Forum (RCF) in the Republic of Moldova is the main interagency forum for discussion of protection issues in the humanitarian response to the Ukraine crisis.[1] Members of the PWG include legal service providers, refugee-led organizations, UN agencies, and organizations dedicated to such protection issues as child protection; prevention, risk mitigation and response to gender-based violence; anti-trafficking; support to persons with specific needs and marginalized groups (older refugees, refugees with disabilities, ethnic Roma, persons with diverse Sexual Orientation, Gender Identity, Gender Expression and Sex Characteristics (SOGIESC)); and community outreach and support. PWG members are engaged in activities throughout the Republic of Moldova, including the region of Transnistria.

In coordination with partners in other relevant sectors of the RCF,[2] the PWG offers the below comments and recommendations with the aim of sharing lessons learned to date and supporting the government of Moldova in ensuring that TP remains accessible to all those who are eligible and seek to benefit from it. Since the government decision on TP was approved, PWG members have been listening to, talking to, and supporting as they can, refugees with questions and concerns about what TP means for them and how to apply. It is these exchanges with refugees that inform the comments provided here.

The PWG provided comments to the draft government decision on TP in November 2022. The PWG recognizes that the government decision on TP, along with the Law on Asylum, is the controlling legal framework in the country for TP, absent any changes by competent government bodies. The comments below are focused primarily on implementation of the TP legal regime as adopted.

II. Legal Background

Until recently, the legal stay and rights of Ukrainian refugees and many third country nationals were controlled by the emergency law in the Republic of Moldova and decisions of the Commission on

[1] The PWG includes the Child Protection Sub-Working Group and the Gender-Based Violence Sub-Working Group, as well as the Roma Task Force, the Disability and Age Task Force, and the Anti-Trafficking Task Force.
[2] Other relevant RCF sectors include education, health, accommodations and livelihoods.

Exceptional Situations (CES). The decisions of the CES allowed for derogations from existing law to respond to the specific challenges of the refugee influx from Ukraine, challenges which were not necessarily anticipated when the existing laws were initially adopted.

Particular CES decisions of note include:

- **CES Decision 1 (February 2022)**: allowing foreigners coming directly from Ukraine to cross the state border based on an expanded list of identity documents, including those with expired validity.
- **CES Decisions 2 (February 2022), 9 (March 2022)**: allowing access to medical assistance under the system of compulsory health insurance (AOAM) to foreign citizens who are refugees from Ukraine in cases of COVID-19 or in cases of medical or surgical emergencies.
- **CES Decision 4 (March 2022)**: allowing Ukrainian citizens the right to work in Moldova during the state of emergency without obtaining temporary residence for work purposes.
- **CES Decision 10 (March 2022):** granting refugee children access to Moldovan educational institutions as auditors.
- **CES Decisions 14 (April 2022), 23 (May 2022), 32 (August 2022), 45 (August 2022):** granting Ukrainian refugees access to medical services included in the AOAM based on the profile of the refugee (e.g., children, women between the ages of 18-55) or the type of service provided (e.g., reproductive health services, dialysis) with reimbursement of costs incurred by the National Health Insurance Company (CNAM) covered by certain UN agencies (UNICEF, UNFPA, IOM).
- **CES Decision 14 (April 2022):** establishing an intersectoral cooperation mechanism for the identification, assistance and monitoring of children in situation of risk coming from the territory of Ukraine.
- **CES Decision 21 (May 2022):** allowing Ukrainian citizens and members of their families who entered Republic of Moldova during the state of emergency, as well as those who were legally on the territory of the Republic of Moldova when the state of emergency was declared, to remain in Moldova beyond 90 calendar days during any period of 180 calendar days.

On 18 January 2023, the government issued **Government Decision (GD) 21/2023**, approving the granting of temporary protection to Ukrainian nationals and certain third country nationals in the Republic of Moldova, effective 1 March 2023. As of 1 March 2023, Ukrainians and eligible TCNs could pre-enroll for TP, with in-person interviews to take place no earlier than 10 working days later, at which point they could receive TP documentation.

As of 1 March 2023, two legal regimes were in effect for those who fled Ukraine: (1) the emergency law and the CES decisions issued under it and (2) the temporary protection regime. The one exception was with regards to health care. On 1 March 2023, the CES issued Decision 61 annulling or amending with immediate effect CES Decision 2 of 25 February 2022 (point 20), CES Decision 14 of 14 April 2022 (point 13), CES Decision 23 of 30 May 2022 (point 2), and CES Decision 32 of 8 August 2022 (point 2), such that Ukrainian refugees could only access primary health care if they had temporary protection status and were registered with a family doctor. Given that in-person documentation for TP did not take place until 15 March, this meant that for at least two weeks, no Ukrainian refugees had access to non-emergency health care services in Moldova. The continuing low enrolment rates for TP mean that few Ukrainian refugees have had access to these health care services since then.

On 10 May 2023, the CES issued Decision 68, annulling a number of previous CES decisions regarding the stay of Ukrainian refugees in Moldova, including, most notably, CES Decision 21, which allowed Ukrainians to remain in Moldova legally throughout the period of the emergency laws. As a result, as of 15 May, Ukrainian nationals previously residing in Moldova under the emergency laws were given 90 days to regularize their status, i.e., by 13 August 2023. CES Decision 4, granting Ukrainians the right to work without a temporary residence permit, was also repealed, effective 15 May, as were certain other CES decisions related to employment and stay of Ukrainians and their family members.

Not surprisingly, CES Decision 68, while not unexpected by many, has created significant anxiety among the Ukrainian refugee community, as it requires them to regularize their legal status in Moldova in some manner (e.g., TP, asylum application, stateless status application, residence permit) by 13 August 2023 or risk becoming undocumented in the country. If undocumented, they would lose access to a variety of government services, as well as become more vulnerable to protection risks and human-rights violations. They would also potentially be subject to deportation to Ukraine, although officials with the Ministry of Internal Affairs and the General Inspectorate of Migration have stated publicly on various occasions that the government would not forcibly return refugees to Ukraine in light of international obligations related to *non-refoulement*.

III. Registration for Temporary Protection

As of 3 July 2023, four (4) months after Temporary Protection went into effect, 10,368 individuals had pre-enrolled for TP, out of whom 6,026 had been issued TP documentation. While these numbers have increased more significantly over the past few weeks, they remain relatively low overall, raising the question of what more can be done to increase registrations. Everyone agrees that TP should be as accessible as possible to those who are eligible for it, both to ensure access to protection and services and to avoid thousands of Ukrainians applying for asylum to regularize their stay, which would place further strain on an already overburdened asylum system.

A. Refugee Intentions and Experiences Applying for TP

Since TP went into effect, PWG partners have been monitoring refugee experiences in applying for it. From 14 - 20 March 2023, the National Congress of Ukrainians in Moldova (NCUM) conducted a rapid survey of Ukrainian refugees on their intentions to apply for TP and their experiences in doing so.[3] Other PWG partners also captured refugee experiences with TP, albeit in a more qualitative form.

PWG partners expanded the NCUM survey tool to capture additional information and deployed it in late April 2023. The results of the PWG survey are attached at Annex 1. An interactive dashboard of the TP survey results, which allows for disaggregation based on different criteria, can be found here: Dashboard

Based on this survey, as of 30 June, 661 adult individuals had been surveyed, a statistically significant number of respondents. Respondents reside throughout the Republic of Moldova, including the region of Transnistria, and live in a variety of housing arrangements (34.6% in RACs; 25.7% renting apartments; 19.7% hosted by family members; and 13.3% hosted by non-family members). Like the refugee population overall, the majority of adult respondents were female.

[3] The results of that survey can be found at: https://data.unhcr.org/en/documents/details/99722.

When asked if they had applied had for TP, respondents were almost evenly split between those who had applied (47.8%) and those who had not (52.2%). For those who had not applied for TP, when asked why they had not done so, 60.7% stated it was because they did not intend to remain in Moldova. 10.8% cited "no particular reason." When asked, though, if they planned to apply, 69.3% of those who had not yet applied said they planned to do so. **This means that 84% of those surveyed had applied or intended to apply for TP.** The percentage of those who had not yet applied but planned to do so increased from 57% to 75.6% between those surveyed before and after 15 May 2023, when the 90-day clock to apply for TP began. These statistics show a strong interest to apply for and be granted TP in Moldova.

Of concern, however, are the responses of those who intended to apply for TP but had not yet done so. Thirty percent (32%) of this group said they had not yet applied because they did not have proof of residence. Of those surveyed after 15 May, this figure rose to 36.3%.

Additional positive results relate to the experiences of the 47.8% of respondents who had applied for TP. Of these, 79.6% said that they did not face any major difficulties with the TP application and interview process as a whole. When asked specifically about their experience with the on-line pre-enrolment form, though, some 63% said they either needed someone to help them or had specific problems with parts if it.

The results of the PWG survey largely align with those of the rumour tracking regularly conducted by the Information Unit of the NGO Laolalta, a member of the AAP Task Force of the RCF. Laolalta regularly monitors one of the biggest refugee help groups in Moldova *Ajutor UA* in Moldova, which has almost 100,000 members. Starting from Mach 2023, rumour tracking showed great interest in TP, but also significant concerns, in particular related to proof of residency. Other concerns that were highlighted included access to mobile teams, fears of what would happen if they (refugees) did not register for TP, and technical problems in the TP registration process (fingerprint capture, problems with on-line pre-enrolment system).

B. Information Campaign

The PWG is aware of, and appreciates, the information campaign that IGM has launched around TP, with the support of UNHCR, as well as the information sessions that IGM staff provided to local authorities and service providers throughout the country. The materials developed by IGM provide information to Ukrainian refugees about the benefits of TP and how to apply for it. The PWG understands that materials are being adapted to meet the information needs of Roma refugees and persons with disabilities. Additional materials are being developed on specific issues, such as the situation of unaccompanied and separated children and on specific rights under TP (health, employment, education etc.). The PWG also appreciate the creation of a "Frequently Asked Questions" (FAQs) document for Ukrainian refugees and service providers, which addresses specific issues around TP as these arise.

It is important that these information efforts continue and be strengthened. The PWG's TP survey found that of the refugees who intended to apply but had not yet done so, 25% said they either did not know how to apply for TP or did not have enough information about it. Based on discussions with civil society organizations in the Transnistrian region, the PWG is aware that lack of information is a particular difficulty for refugees residing in this region, in part due to the absence of an organized government information campaign there.

PWG members are providing information to refugees to the extent they can, including through information sessions and individual counseling.

The ***PWG would recommend*** the following to strengthen information and outreach efforts:

- In the absence of a government information campaign, provide guidance to service providers / NGO workers on how they can circulate information to refugees and CSOs in the Transnistrian region;
- Develop and deploy information materials targeting Moldovan landlords and property owners, as well as RAC managers, on the need to facilitate documentation of proof of residence for Ukrainian refugees (see Section F, Documentation Issues, below). Moreover, there is a need to inform generally Moldovan citizens on what is Temporary Protection.
- Ensure government staff in different ministries are fully aware of the Temporary Protection legal regime and the role of their ministries in its implementation terms, as well as the procedures in place to ensure access to rights and services for TP beneficiaries related to the work of their Ministry.
- Increase outreach to, and develop TP information for, local public authorities, given their possible role in the registration process (e.g., proof of residence), as well as provision of services to TP beneficiaries.
- Simplify the language of the FAQs wherever possible to ensure proper understanding of what is required of applicants.
- Supplement the FAQs promptly to address issues as they arise and make them available to humanitarians and public servants. Clarify in the Q&A TP eligibility for certain groups, especially those with dual nationality, as there are many questions on this issue (see Section D, Eligibility Criteria, below).
- Publish information on government websites in the Ukrainian language, as they are the official source of information.
- Ensure information material is adapted to the needs of vulnerable groups (see Section H. Older Refugees and Persons with Disabilities, below).

C. TP Statistics

IGM currently shares statistics on TP pre-enrolments and issuance of documents on a weekly basis. For those issued TP documents, the number of adult and child beneficiaries is also provided.[4] To ensure a full and common understanding of TP registration to date, the ***PWG recommends*** that the following statistics also be shared on a weekly basis:

- Number of TP applicants whose applications were denied due to lack of proper documents or for failure to meet eligibility requirements.
- Gender and age (adult/child) of persons who have pre-enrolled for TP and who have been issued TP documentation.
- Breakdown of pre-enrolments and issuance of documentation by IGM office;
- Number of individuals requesting mobile units and number of people issued documentation through mobile units.

[4] *See* IGM Facebook account, at https://www.facebook.com/migratieMDA.

- Raion of residence in Moldova of TP applicants and status of their applications.

D. Eligibility Criteria

The government decision on TP sets out the criteria for persons to be eligible for TP. Those eligible include Ukrainian citizens residing in Ukraine before 24 February 2022; Ukrainian citizens on the territory of the Republic of Moldova before 24 February 2022; stateless persons and third country nationals who benefited from international protection or an equivalent national protection in Ukraine before 24 February 2022 and who cannot safely return to their country or region of origin; and family members of the above persons. GD 21/2023, Art. 1.

The PWG is aware of certain cases, however, where questions about TP eligibility have been raised. These include:

- **Non-Ukrainians with children who are Ukrainian citizens (e.g., born in Ukraine).**

  In principle, according to the GD, if a child is Ukrainian, his or her non-Ukrainian parents should be eligible for TP as family members. This avoids family separation and is in the best interest of the child.

  PWG partners are aware of IGM officials not allowing children with Ukrainian citizenship to apply for TP if they are eligible to apply for Moldovan citizenship. While Moldovan law allows for dual citizenship, Ukrainian law does not. As such, by requiring Ukrainian children to apply for Moldovan citizenship to obtain a secure legal status, the government is placing these children at risk of losing their Ukrainian citizenship. The PWG encourages IGM to reconsider its position regarding these cases.

- **Non-Ukrainian family members who reside in Moldova, with the Ukrainian family member (e.g., spouse, father) still in Ukraine or in another country.**

  The PWG would encourage the MIA to interpret or amend the eligibility criteria for TP under the terms of GD 21/2023 to allow for non-Ukrainian family members of Ukrainian nationals who are still residing in Ukraine to access TP in Moldova. This would allow the family members to remain in close contact with each other, especially if the Ukrainian family member cannot leave Ukraine, for example, due to conscription requirements.

- **Arrival in Moldova before 24 February 2022**

  GD 21/2023 provides that Ukrainians who were on the territory of the Republic of Moldova before 24 February 2022 are eligible for TP. Art. 1(b). It is not clear, however, how much before 24 February 2022 is permissible. The Information Note to GD 21/2023 states that *"temporary protection is given to Ukrainian citizens who fled Ukraine shortly before 24 February 2022, when tensions intensified, or who were on the territory of the Republic of Moldova on that date (for example, on vacation or for professional reasons) before this date and who, as a result of the armed conflict, cannot return to Ukraine."* It would be helpful to provide more clarity on the time-period contemplated by this provision.

The ***PWG recommends*** that IGM clarify the eligibility of the above family members for TP and ensure that all IGM registration officers are so informed. If IGM considers that the above individuals are not eligible for TP under the terms of GD 21/2023, the PWG recommends that GD 21/2023 be amended to include them.

E. Travel to and from Ukraine

It is well-known that many Ukrainian refugees residing in Moldova undertake brief trips to Ukraine for various reasons, including to visit family, check on property, and manage administrative and/or legal matters. Many refugees must travel to Ukraine to obtain Ukrainian identity documents or other civil documentation, either due to delays in obtaining them through the consular offices of Ukraine in Moldova, which are overworked, or the inability to obtain certain documents abroad. Visits to family have been particularly important for the Ukraine refugee crisis as most Ukrainian adult men are required to remain in the country due to conscription requirements and many older family members have chosen to remain in the country despite the dangers of doing so. Many refugees have chosen to reside in Moldova due to its proximity to Ukraine. Visits to Ukraine are always accompanied by a degree of risk of death or serious harm due to Russian bombings or fighting between the parties to the conflict.

Under GD 21/2023, beneficiaries of TP who are outside of Moldova for more than 45 cumulative days before 1 March 2024 will lose their TP status.[5] Art. 29(c). IGM has since clarified that those who lose their TP status as a result of the 45-day absence limit may re-apply and that the renewed application would be examined on a case-by-case basis.[6]

Refugees have told PWG members that a major point of reluctance in registering for TP is the 45-day limit on absence from the country. Many are unaware that they can re-apply for TP if they lose their status, or, if they are aware, are still concerned that the status may not be granted anew if they need to re-apply. At a minimum, this causes many Ukrainians to delay their registration for TP for as long as possible, so as to shorten their period of TP status during which the 45-day cumulative absence period would apply.

As well, it is understood that some Ukrainians are reluctant to apply for asylum, in the event they are unable to apply for TP, as they would need to surrender their passport to the IGM and, in principle, not be allowed to leave Moldova. See, art. 59(2)(a), Law on Asylum, Law No. 208/2018 (implicit renunciation of asylum application if the applicant leaves the territory of the Republic of Moldova).

To ensure that the 45-day provision of the government decision on TP or the travel restrictions on asylum-seekers do not become unnecessary impediments to registration for TP or asylum by Ukrainians displaced from Ukraine, ***the PWG recommends*** that the IGM:

- Make clear in its information that individuals who exceed the 45-day limit on cumulative absence are able to reapply for the TP.
- Provide reassurances that brief absences from Moldova to visit family, property, etc., will not affect their eligibility for TP if they must re-apply.

[5] The PWG is aware that the Office of the Ombudsman in the Republic of Moldova has challenged the legality of this provision, arguing that it exceeds the grounds for cessation of temporary protection under the Law on Asylum, Law No. 270/2008.

[6] See FAQs, at 14.

- Clarify situations where an absence for more than 45 days would also be permissible (e.g., sailors).

F. Documentation Issues

To register for TP, otherwise eligible applicants must provide documentation of their nationality, legal status in Ukraine (if they had refugee status or stateless status in Ukraine), family relationship and proof of residence in the Republic of Moldova.

Proof of Nationality

GD 21/2023 allows for a wide range of identity documents to be used to prove Ukrainian nationality. See art. 3. In general, the Ukrainian refugee population in the Republic of Moldova is well-documented. Based on UNHCR's ongoing Regional Protection and Profiling, very few Ukrainians in Moldova lack a Ukrainian identity document. (Those lacking biometric passport (4%), internal passport (1%), ID card (1%)).[7]

The above said, it is known that documentation of nationality can be particularly challenging for certain groups, in particular ethnic Roma refugees, many of whom are undocumented. 5.7% of Ukrainians surveyed by PWG partners who had not yet applied for TP but wanted to do so cited lack of identify documents as a reason. PWG members will continue to support those lacking identity documents in obtaining them, including identity certificates issued by the Embassy of Ukraine where possible. For those unable to obtain an identity document, PWG members will inform them of the option to seek another form of legal status, including asylum or stateless status.

Proof of Family Relationship

Of those Ukrainians surveyed by PWG partners who had not yet applied for TP but wanted to do so, 4.4% cited lack of proof of family relationship as a reason for not yet doing so. To date, PWG partners have not seen major issues in the ability of Ukrainian refugees to obtain these documents.

Proof of residence

As noted above and as expressed during the Commission's meeting on 5 June, proof of residence remains a major obstacle for Ukrainian refugees wishing to apply for TP. According to the PWG's TP survey, approximately **one-third** of those surveyed who stated that they intended to apply for TP had not yet done so due to problems providing/demonstrating proof of residence. The PWG appreciates the meeting that IGM convened on 14 June with partners to discuss this matter further.

Under GD 21/2023, to demonstrate proof of residence, an applicant must submit one of the following documents:[8]

- declaration of acceptance in the housing space by the owner or co-owners of the dwelling - natural person.

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[7] See https://data.unhcr.org/en/dataviz/250?sv=0&geo=680.

[8] According to the FAQs approved by IGM (rev 29 March 2023), TP applicants must actually provide **two** documents: (1) declaration of occupancy by the owner or co-owners of the dwelling (natural or legal person); and, (2) document proving residence and/or ownership of the property. It is not clear if this requirement is consistent with GD 21/2023. *See* Temporary Protection: Republic of Moldova: Frequently Asked Questions, at 5-6, available at https://drive.google.com/drive/folders/1qleKY_MGN5rQNj0ACR2zgJmXG8VIQLd9.

- declaration of acceptance in the housing space by the owner or co-owners of the dwelling - legal person.
- document certifying the right of ownership or use of the dwelling, in accordance with point 106 of the Regulation on the issuance of identity documents and keeping records of residents of the Republic of Moldova, approved by Government Decision no. 125/2013.[9]

With regards to the declaration, IGM requires either that the declaration of acceptance in the housing space by the owner or co-owner be notarized or, in the absence of a notarized declaration, that the owner or co-owner accompany the TP applicant to the TP interview at the IGM office.[10] The average cost of a notarial service to certify a single document can be as much as 400-500 Moldovan lei.

Many Ukrainian nationals are unable to satisfy the proof of residence requirement in Moldova, in large part due to the unwillingness of landlords or property owners to sign and/or provide the documents needed by a refugee to prove residence. 43% of Ukrainians renting apartments in Moldova surveyed by PWG partners who wished to apply for TP but had not yet done so cited proof of residence as an obstacle (as compared to 32% of all those surveyed.) Refugees have reported that landlords or property owners refuse to cooperate because, inter alia, they have not declared their rentals to the Moldovan tax authorities and fear financial penalties if the rentals became known, they are abroad and unwilling to take the necessary actions to confirm the refugee's residence, or they fear that the declaration will provide refugees with rights over the property itself. Landlords are also unwilling to take the necessary time to either notarize a declaration or to accompany a refugee to IGM registration sites.

As well, it is recognized that some Ukrainians are renting properties indirectly through Moldovan nationals, for example, through formal or informal sub-letting arrangements. This is often done due to the unwillingness of property owners to rent to Ukrainian nationals whose ability to maintain a regular status in the country was uncertain under the emergency laws.

Refugees residing in the Transnistrian region face the additional obstacle that documents proving ownership of the property in the Transnistrian region (e.g., technical passport for the property) are not recognized by IGM. The PWG also understands that if a landlord from the Transnistrian region lacks the Moldovan ID code, the IGM will disregard the declaration.

Finally, the PWG is aware of contradictory information being provided by different actors regarding the acceptability of documents such as tax declarations and notarized applications/contracts, and whether just one or both is needed. To ensure a uniform practice, it would be helpful for IGM clarify this matter.

The PWG urges the MIA to simplify its proof of residence requirements to address these issues. Many countries in the EU either do not require proof of residence to obtain TP or have less cumbersome

[9] It is noted that the Regulation on the issuance of identity documents and keeping records of residents of the Republic of Moldova under GD 125/2013 was approved over a decade ago and was not envisioned as a gateway to the regularization of legal status for a hundred thousand people displaced from Ukraine. Indeed, the decisions of the CES derogating from existing law in a variety of areas are a recognition of the need to adapt existing laws to the requirements of the current displacement crisis.

[10] *Id.*

procedures.[11] The PWG appreciates IGM's preparedness to discuss this issue with partners and government officials, as it did at the working group meeting on 14 June. The PWG also appreciates recent clarifications by IGM that documents provided to IGM by property owners will not be shared with tax authorities and for IGM's public messages to Moldovan citizens calling on them to cooperate in the provision of documents required for Ukrainian refugees to prove residence.[12] More efforts, however, are needed to overcome this challenge.

In light of the above, the ***PWG recommends*** the following:

- Simplify the proof of residence requirements to the extent possible to ensure that TP is accessible to Ukrainian refugees in light of the particular circumstances surrounding their displacement and residence in the Republic of Moldova. Options include:
    - Self-declaration by Ukrainian refugees confirming their residence;
    - Elimination of requirement that declarations signed by landlords/property owners be notarized or that landlords/property owners accompany refugees to TP interviews at IGM offices.
    - Acceptance of other documents proving residence, such as proof of school enrolment, proof of services provided by government authorities or civil society, etc.
- If property ownership documents and lease agreements are required to prove residence, confirm if the documents themselves are acceptable and sufficient or if notarization is required.
- Utilize other government resources to confirm residence in the Republic of Moldova, such as entries and exits from the country, which would indicate if a TP beneficiary is actually residing in Ukraine or another third country.
- Consider modifications on proof of residence requirements for refugee residing in the Transnistrian region to the extent that documents issued by the *de facto* authority is not accepted on the Right Bank, to ensure equal access to TP.
- Continue to support efforts to incentivize property owners to cooperate in the production of the necessary documents to prove residence for Ukrainian refugees and to use the information campaign to address any concerns they may have in doing so (e.g., fear of tax consequences, fear of refugees gaining rights to their property, etc.).
- With humanitarian actors providing cash assistance to Moldovan host families, consider financial incentives to reimburse host families for any costs incurred in facilitating the documentation of refugee residence in Moldova.
- Clarify, if only through the FAQs, the acceptability of documents such as tax declarations, in lieu of notarized applications/contracts.

[11] EU countries that do not require proof of residence include, e.g., Spain, Germany, Romania and Austria. The Czech Republic need only provide "proof of accommodation," which can be satisfied by a signed declaration that is not notarized.

[12] See IGM Facebook page, at https://www.facebook.com/migratieMDA.

G. Technical issues related to the TP registration process

The TP registration process involves two steps: (1) on-line pre-enrolment, and (2) in-person interview and documentation at a designated IGM office.

As noted earlier, according to the PWG's TP survey, of the 47.8% percent of respondents who stated they had applied for TP, 79.6% said that they did not face any major difficulties with the TP application and interview process as a whole. Some 63%, however, said they did have difficulties in completing the on-line pre-enrolment form or that they needed the assistance of someone else to complete it.

To date, PWG members have been informed of the following technical problems related to the TP registration process:

- inability to capture fingerprints on the machines used at the IGM registration locations, requiring refugees to go to other government offices to obtain ink fingerprints and then return to the IGM office to finalize the TP registration process and obtain their TP card.
- inability for social workers (as legal guardians for unaccompanied and separated Ukrainian children) or NGO service providers to use the same phone number to pre-enroll multiple individuals.

The ***PWG recommends*** *that* IGM to review the technical problems and address them as soon as possible, especially in light of the anticipated increased demands on the system as the 13 August deadline to regularize status approaches.

H. Older Refugees and Persons with Disabilities

Approximately 10% of refugees in Moldova are living with a disability[13] and 22% of refugee households have at least one family member with specific needs, such as a disability or serious medical condition. About 15% of Ukrainian refugees are over 60 years old.[14] For these individuals, access to TP carries with it additional obstacles. These include, for example, difficulties in traveling to IGM registration locations, difficulties in accessing information materials and TP registration documents, and difficulties in understanding information related to TP.

Mobility issues

The ability of refugees with serious mobility issues, either due to a disability or serious medical condition or because of their age, to travel to an IGM registration site is of particular concern. PWG partners surveyed 75 individuals over the age of 60 who stated that they had some or a lot of difficulty walking. Of those who had not yet applied for TP but wished to do so, nearly 25% cited difficulties reaching an IGM registration site as an obstacle. The PWG is pleased that the IGM mobile units for registration of persons with mobility issues and the option to request a mobile unit when pre-enrolling for TP are now available. According to statistics provided by IGM at the 5 June Commission meeting, only 47 people had been registered as of that date through the IGM mobile units.

Now that the IGM mobile units are operational and can be requested on-line, it is important that the criteria for deployment be clearly understood as PWG members have reported continued difficulties in

[13] See https://cdpd.md/wp-content/uploads/2023/03/@Needs-Assesment-UA-Refugies-final_eng_red.docx
[14] UNHCR regional protection profiling and monitoring tool. https://data.unhcr.org/en/dataviz/250?sv=0&geo=680

arranging mobile unit visits. The PWG understands that IGM has developed SOPs for the mobile units, which is much welcomed. PWG members have received reports of IGM offices refusing to deploy mobile units if only one or two people in a given location are in need of it. While the PWG appreciates the need for IGM to efficiently use its resources, it is important that any person in need of and eligible for mobile registration be able to access this service within a reasonable period of time after a request is made, regardless of the number of requests made from a given location.

In terms of the criteria for deployment of the mobile units, the PWG encourages IGM to be as flexible as possible in terms of the level of disability required. For those not eligible for registration by an IGM mobile unit, but who otherwise have mobility problems, PWG members will continue to try and facilitate transportation to IGM registration sites wherever possible.

A major concern for PWG members is the ability of refugees with serious mobility issues residing in the Transnistria region to access IGM registration sites given the inability of IGM mobile units to operate there. To the extent possible, PWG members will seek to facilitate the transportation of refugees with disabilities on the Left Bank to the Right Bank for TP registration, although some CSOs are concerned about the ability of Ukrainians to re-enter the Transnistrian region after traveling to an IGM office to register for TP due to restrictions on entry imposed by the *de facto* authorities.

Even if these transportation efforts are successful for most of those with mobility issues, the PWG is aware of some Ukrainian refugees who are bedridden in the Transnistrian region and are physically unable to travel at all. The Disability and Age TF is working to identify those cases. A solution needs to be found for these individuals. The PWG encourages IGM to develop alternative registration procedures for these individuals, such as remote registration, perhaps without a fingerprint capture. Presumably the number of such individuals is small.

Visual and Intellectual Disabilities

The Multi-Sector Needs Assessment (MSNA)[15] conducted in September 2022 by REACH in Refugee Accommodation Centers (RACs) and host communities across Moldova found that among the households surveyed, 19% reported at least one member with difficulties seeing. It is also known that many Ukrainian refugees suffer from intellectual disabilities, such as those with Down Syndrome or other mental impairments.

Different accommodations are needed to ensure that these individuals have meaningful access to TP. These include ensuring that information materials and documents are accessible to those with visual impairments, including through large type fonts and Braille. Similarly, and as noted earlier, information material should be as easy to read as possible for those with intellectual disabilities.

As well, many of those with visual or intellectual disabilities will need assistance in completing the on-line enrolment form and traveling to IGM registration sites. The PWG is pleased that the IGM developed the online registration form which is accessible for refugees with visual impairment using screen readers. PWG members will continue to assist where they can but encourage IGM to make its mobile teams available to the extent possible for them as well.

[15] https://reliefweb.int/report/moldova/moldova-multi-sector-needs-assessment-msna-key-findings-september-2022

Based on the above, the PWG recommends that IGM:

- Make clear and publicize the criteria for deployment of IGM mobile units for TP registration.
- Apply flexible criteria in terms of the level of disability required for mobile registration.
- Ensure that those requesting and eligible for mobile registration are registered within a reasonable period of time and that requests are not denied simply because the numbers of those in need of this service are not enough in a given location.
- Deploy to the extent possible IGM mobile units to assist with the TP registration of refugees with serious visual or intellectual disabilities.
- Develop alternative registration procedures for refugees in the Transnistrian region who are physically unable to travel to the Right Bank due to a disability or serious medical condition.
- Ensure that TP information material and TP registration documents are accessible to those with visual and intellectual disabilities.
- Ensure people with disabilities are able to access IGM offices safely and independently to complete the application procedures.

I. Gender Differentiation

Nearly 70% of Ukrainian refugee adults residing in the Republic of Moldova are women. Among the refugee population overall, 83% are women and children. PWG partners have also reported that some Ukrainian men are anxious about registering for TP in Moldova if they are of conscription age in Ukraine. Given the above, it is important that the government and humanitarian partners remain aware of any gender differentiation in the implementation of TP for otherwise eligible persons.

To this end, the ***PWG recommends*** that the government collect statistics on TP enrolment and documentation by gender and age (adult/child) and analyze this data to understand any gender differentials in terms of access to TP for women, men, girls and boys of different ages as the registration unfolds. PWG partners are prepared to support IGM in this exercise, as well as to examine data available from other sources that capture disability-related information, to ensure that all eligible individuals are able to meaningfully access TP.

J. Unaccompanied and Separated Children (UASC)

According to the Ministry of Labor and Social Protection, it is estimated that as of early June 2023, approximately 591 unaccompanied Ukrainian refugee children and 1439 separated children[16] had entered Moldova since the beginning of the war, many of whom having since left the country. This number does not include separated children who entered Moldova with a caregiver in possession of a power of attorney.

MIA and the Ministry of Labour and Social Protection (MLSP) have stated that UASC can only be registered for TP by their parent or legal guardian. A power of attorney document issued by Ukrainian authorities to a caregiver is usually not a sufficient legal basis to register a child for TP, as most power of attorney documents do not grant the temporary caregiver the authority to apply for a legal status for the child. If

[16] A separated child is any child who is separated from both parents, or from his or her previous legal or customary primary caregiver, but not necessarily from other relatives. Separated children, therefore, include those accompanied by adult family members, such as grandparents and aunts and uncles, who did not care for the child in the country of origin.

a Ukrainian child does not have a legal guardian in Moldova, then the Guardianship Authority will step into this role. Once appointed, a social worker with the Guardianship Authority can apply for TP for the Ukrainian child. It is not clear how many UASC have been registered for TP to date by the IGM.

The PWG understands that many caregivers and local authorities are not aware of the registration requirements for UASC, or that they need support in doing so, which risks Ukrainian UASC not being registered for TP. The PWG is also concerned that not all IGM registration staff are necessarily aware of who should be considered a UASC and what documents are needed to register them.

As noted earlier, the PWG appreciates the planned information materials on registration of UASC for TP, which should help fill this information gap. The PWG hopes these materials are developed and issued soon. The PWG also appreciates the training that was provided by IGM and CDA to staff working with the Guardianship Authority on TP registration procedures for UASC. The PWG would recommend that IGM registration staff receive a brief training on UASC so that they can identify UASC seeking registration and ensure that the proper procedures are followed. Members of the Child Protection Sub-Working Group would be pleased to assist with this.

There are also certain registration scenarios involving UASC and enrolment impediments that need to be addressed. Most urgently, the issue of UASC residing in the Transnistria region requires attention. It is assumed that IGM will not recognize the *de facto* authorities in the Transnistrian region responsible for child welfare as the legal guardian of a Ukrainian UASC for purposes of registration for TP. It is also understood that the Guardianship Authority of MLSP cannot act as a legal guardian for a child residing in the Transnistrian region for this purpose. The child would need to move to the right bank for the Guardianship Authority to assume this role. If neither the *de facto* authorities on the Left Bank nor the Guardianship Authority on the Right Bank can act as the child's legal guardian, it is unclear how the child can register for TP. This needs to be resolved and clearly communicated to caregivers of UASC on the Left Bank.

In sum, the PWG makes the following recommendations related to UASC:

- Finalize and disseminate as soon as possible information materials, including youth friendly materials, related to the registration of UASC for TP.
- Provide trainings to IGM registration staff on identification of UASC and TP registration procedures (the Child Protection Sub-Working Group would be happy to provide these).
- Clarify the necessary procedures to register for TP for UASC residing in the Transnistrian region.
- Provide additional support to Guardianship Authority staff on the procedures for them to register UASC.
- In case a child's caregiver is not eligible for TP, provide access to some kind of legal status so that the caregiver can remain in the country with the child and avoid family separation.
- Enable social workers (as legal guardians for unaccompanied and separated Ukrainian children) to use the same phone number to pre-enroll multiple individuals for TP.

K. Roma refugees

It is estimated that there are between 4,000-6,000 Roma refugees from Ukraine in the Republic of Moldova. Many reside in the Transnistrian region. Registration of Roma refugees for TP carries with it particular challenges, including:

- Lack of documentation by many Roma refugees, including with regards to nationality, family relationships and residence in Moldova.
- Illiteracy and limited education of many Roma adults.
- Distrust of government authorities, as well as of many CSOs, by the Roma community.
- Social isolation and lack of access to information on TP.
- Desire to travel back and forth to Ukraine to see family members add check property (as with other Ukrainian refugees).

The PWG ***recommends*** that IGM:

- Increase deployment of Roma community mediators to share messages on TP registration as well as support pre-enrollment.
- Work closely with Roma community mediators and Roma NGOs on the TP registration process, including through trainings on TP and explanations of other forms of legal status for which Roma refugees may be eligible.
- Consider deployment of IGM mobile units to assist with TP pre-enrolment given low literacy level among Roma communities.
- Work with UN agencies, NGOs and others involved in the refugee response to identify any gender related barriers to registration for Roma women, men, boys and girls as the TP registration progresses.

L. Refugees residing in the Transnistrian region

It is estimated that some 8,000-10,000 Ukrainian refugees reside in the Transnistrian region. Many choose to live there due to the (self-reported) cheaper cost of living, family connections or previous residence there. According to IGM, as of 5 June 2023, 76 refugees residing in the Transnistrian region had been registered for TP, alhtouh the PWG understands the numbers have increased since then.

As noted elsewhere in this document, refugees residing in the Transnistria region face particular obstacles in registering for TP. These include:

- Absence of a TP information campaign.
- Concerns about whether documents issued by property owners or municipal authorities will be accepted by IGM as proof of residence.
- Challenges in obtaining necessary documents to show proof of residence from landlords or property owners who reside outside of the Republic of Moldova, e.g., in the Russian Federation.
- Need for landlords or property owners to accompany TP applicants to their IGM interviews, as declarations notarized in the Transnistria region are not recognized as valid.
- Need for a Moldovan mobile phone number to register for TP, which some Ukrainian refugees do not have, as well as limited telephone service for Moldovan phone numbers in parts of the region.
- Expense for families to travel to IGM registration sites on the Right Bank to register for TP;
- Registration of UASC residing in Transnistria region (see Section J, UASC, above.)
- Difficulties for persons with disabilities or serious medical condition to travel to the Right Bank to register for TP.

- Concerns that refugees who do not have a Moldovan entry stamp in their passport (for example, because they entered through the now-closed "Kuchurgan" crossing point between Ukraine and the Transnistria region) will not be able to register for TP.

The PWG appreciates the proposal by MIA at the 5 June Commission meeting to form a Working Group on TP and the Transnistrian region with the involvement of the Bureau of Reintegration. The PWG also appreciates the participation of the Bureau of Reintegration at the IGM meeting on the information campaign on 15 June 2023. Understanding the government challenges in implementing TP in the Transnistrian region, the ***PWG recommends*** that the following measures be taken to the extent possible to facilitate access to TP for those residing there:

- Discuss with the *de facto* authorities the need to ensure that Ukrainian refugees are aware of the need to register for TP (or another legal status in the Republic of Moldova) to regularize their stay in the country and to access services on the Right Bank, and to discuss and agree upon procedures to facilitate TP registration to the extent possible.
- With regards to proof of residence:
    - Consider modifications of the proof of residence requirement for refugee residing in the Transnistrian region, in particular given that documents issued on the Left Bank may not be accepted on the Right Bank. See options included in Section F, Documentation, above.
    - If notarized documents are requred for TP registration, accept documents notarized in the Transnistrian region. If documents notarized in the Transnistrian region are not accepted, make that clear through the TP FAQs and/or other communication channeles.
    - Clarify whether property owners on the Left Bank must be Moldovan citizens to provide proof of residence for TP beneficiaries, or if third-country nationals also have this right.
    - Confirm if registration forms issued by managers of refugee accommodation centres on the Left Bank are accepted similar to those provided by managers of accredited RACs on the Right Bank.
- Confirm if CSOs/NGOs operating in the Transnistrian region can distribute the TP information materials produced by IGM.
- Confirm TP registration procedures for UASC residing in the Transnistrian region.
- Develop alternative registration procedures for refugees in the Transnistria region who are physically unable to travel to the Right Bank due to a disability or serious medical condition.

IV. Deadline to regularize status and situation of those who fall out of lawful status

Under CES Decision No. 68, Ukrainian refugees who were present in Moldova as of 15 May 2023 have 90 days as of that date to regularize their status, i.e., until 13 August 2023. It can be anticipated that there will be an increased number of enrolments in the weeks before 13 August and that some/many will not be able to secure an in-person appointment before that date. It can also be anticipated that there will be some/many Ukrainians who do not pre-enroll prior to 13 August 2023 and do not obtain an alternative legal status, thereby falling out of status. Some may wish to apply for TP after that date, some may choose to remain undocumented, and some may choose to leave Moldova, either returning to Ukraine or traveling onward to another country.

According to public statements made by MIA and IGM officials, and consistent with the text of GD 21.2023, persons otherwise eligible for TP can apply at any time, under the same procedures that currently exist.

Lawful status in Moldova is not a requirement or eligibility criterion to receive TP. Government officials, however, have indicated that TP applicants who are otherwise on the territory without lawful status may be required to pay a fine.[17]

Importantly, MIA/IGM officials have also stated publicly that the government of Moldova will not forcibly return any Ukrainian nationals to Ukraine, consistent with the government's *non-refoulement* obligations.

legal status would not have access to primary health care, lawful employment, or government social assistance measures. Ukrainian children would continue to have access to education (although it is unclear if they would only be "audience members" or fully enrolled) and all Ukrainian would have access to emergency medical care. It is not clear if Ukrainians without legal status in Moldova would have access to Refugee Accommodation Centres (RACs).

In terms of travel to Ukraine, it is the PWG's understanding that Ukrainians without lawful status seeking to return to Ukraine should generally be able to depart Moldova, although they may be required to pay a fine for being in Moldova irregularly. Should they wish to re-enter Moldova, according to art. 4 of GD 21/2023, they "shall be authorized to cross the state border" using a range of identity documents. It is unclear what, if any, other entry requirements would be applied, although it appears that they would not be permitted to enter if they had already exceeded a 90-day presence in Moldova in any given 180-day period. It is unclear if an intention to apply for TP would be a sufficient basis to re-enter Moldova.

Regardless of any entry requirements that may be applied, or the ability of returning Ukrainians to enter Moldova for the stated purpose of applying for TP, the PWG assumes that any Ukrainian national seeking to enter Moldova who expresses a fear of harm in Ukraine would be permitted to apply for asylum at any border crossing point. Upon entry to Moldova, the individual could, in principle, withdraw his or her asylum application and then apply for temporary protection.

The ***PWG encourages*** the MIA to facilitate the registration for TP of all eligible Ukrainians in Moldova to the extent possible, regardless of legal status, including by reducing if not waiving any financial penalties for those in the country unlawfully as of 13 August 2023 but who wish to benefit from TP. This would especially apply to those who pre-enroll for TP prior to 13 August but are not able to secure an in-person appointment with IGM before the 13 August deadline.

The ***PWG also encourages*** the government to make clear to refugees the consequences of falling out of legal status in Moldova, in particular with regards to access to government services and their ability to travel to and return from Ukraine. At a minimum, this information could be included in the FAQs already being produced and disseminated to service providers.

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[17] According to the Contravention Code of the Republic of Moldova No 218-XVI of 24 October 2008 (Official Monitor of the Republic of Moldova, 2009, No 3-6, Art. 15), art. 333(1), the potential fine would appear to be between 1,000-2,500 Moldova lei. ("Violation by foreign citizens or stateless persons of the rules of residence in the Republic of Moldova by not voluntarily leaving the territory of the country upon expiry of the period of stay or residence granted shall be punishable by a fine of 20 to 50 conventional units." One conventional unit = 50 Moldovan lei.

V. Access to rights

Health care

The PWG continues to remain concerned about the ability of Ukrainian nationals not registered for TP to access primary health care, especially given the obstacles noted above in doing so, such as proof of residence. The PWG is also concerned about the scope of care available to TP beneficiaries given that they do not have access to medical insurance.

As is known, certain UN Agencies (UNICEF, UNFPA, IOM) have bilateral agreements with the state health insurance company, CNAM, to reimburse CNAM for health costs related to Ukrainian children (UNICEF), Ukrainian women between the ages of 18-55 (UNFPA) and persons in need of dialysis (IOM). IOM also has an agreement with a cancer institute to cover the costs of certain cancer treatments. It is the PWG's understanding that, as of 1 March 2023, these reimbursement arrangements with CNAM are now limited to medical services provided to TP beneficiaries under GD 21/2023.

It is in the interest of all, including the government of Moldova, to ensure that those on the country's territory have meaningful access, at a minimum, to primary healthcare, including medications. Proper preventive health care reduces the risk of emergency care being needed, which not only puts refugees' lives at risk, but is also quite expensive for the State. As well, access to primary health care reduces the possibility of Ukrainian refugees trying to access these same services through emergency services, for which they would remain eligible.

The PWG understands that the Ministry of Health has now established a working group on access to health care and TP, which met for the first time on 11 May 2023. It is unclear when the working group is scheduled to meet next.

The ***PWG would urge*** this working group, in coordination with MIA/IGM, to:

- Widely disseminate information on the rights of TP beneficiaries to health care in Moldova.
- Identify a mechanism by which UN agencies can cover health-related costs for Ukrainian refugees in Moldova, regardless of legal status, as initially envisioned under their bi-lateral agreements with CNAM.

Employment

Under CES Decision 68, as of 15 May 2023, Ukrainians are no longer able to work lawfully in Moldova under the emergency laws. Rather, they must either obtain TP or another legal status that allows them the right to work, such as a residence permit based on employment, fulfilling the ordinary requirements that attach to such status.

As of 15 May 2023, according to press accounts, some 1,065 Ukrainian refugees were formally employed in Moldova, based on notifications sent to the National Employment Agency. Refugees and employers have raised questions about the continued validity of these contracts as a result of CES Decision 68. MIA officials have made statements indicating that CES Decision 68 is not to be applied retroactively and that existing contracts should remain valid while affected Ukrainians otherwise seek to regularize their status. The National Employment Agency, through the Livelihoods and Inclusion Working Group, has confirmed that contracts issued before 15 May under the emergency law remain valid for an additional 90 days.

To ensure a smooth transition to the regular legal regime for employment of Ukrainians displaced from Ukraine, the ***PWG would recommend*** the following actions:

- Disseminate information to both refugees and employers regarding the validity of the contracts issues prior to 15 May based on the emergency law, on the steps that Ukrainians must take to maintain employment contracts secured prior to 15 May; as possible, this information should be sent directly to the refugees whose contracts were registered with the National Employment agency as of 15 May 2023, as well as through local and international partners.
- Disseminate information about the fact that a minimum salary equal to the average salary in the Republic of Moldova is not mandatory for beneficiaries of Temporary Protection.
- Prepare and disseminate information materials on the right to employment of beneficiaries of temporary protection and the need for Ukrainian nationals to regularize their status to ensure that they are able to work lawfully.

Accommodations

As of end June 2023 there were some 54 accredited Refugee Accommodation Centres (RACs) operational in Moldova. Since the outset of the refugee crisis, access to RACs has been flexible. Eligible residents have included all persons displaced from Ukraine, including third country nationals and Moldovans with dual Moldova-Ukrainian citizenship who had been residing in Ukraine.

On 25 April 2023, MLSP issued regulations providing additional information on the organization and functioning of temporary placement centres for refugees. Updated regulations were published by MSLP for comment on 26 June, with public comments due by 7 July.

According to art. 15 of the MLSP regulation issued on 25 April, people seeking admission to a refugee accommodation centre (or "temporary accommodation centres") must indicate that they are either applying for TP or will apply for asylum. See articles 14-15, and Annex 2. The draft regulations that were recently published indicate that all persons displaced from other states, including those benefiting from temporary proection, are eligible to reside in the centres. See article 14. Stays are limited to 90 days, although those particularly vulnerable residents included integration and social inclusion programmes who do not have means of support may be able to extend their placement. See articles 42-45.

PWG members are aware of some RAC managers telling residents of RACs that they cannot remain there unless they either apply for TP or asylum. This has proven difficult for persons displaced from Ukraine who are either third country nationals who may not be eligible for asylum or those with dual Moldovan-Ukrainian nationality who have lived in Ukraine for many years and lack support systems in Moldova, as they are not eligible for TP or asylum.

The ***PWG recommends*** that the government

- Allow all persons displaced from Ukraine (and elsewhere) to have access to temporary accommodation centres as needed, as they settle in and take the necessary steps to regularize their stay in Moldova.
- Disseminate widely eligibility criteria, should the proposed text in the draft regulations be adopted.
- Clarify what it means to be "included integration and social inclusion programmes" such that one may be able to remain in an accommodation centre beyond 90 days.

- Make all available efforts to support those who are able to transition to more independent living arrangements.

Education

According to data provided by the ministry of Education and Research (MER) in April 2023, out of the total number of Ukrainian children (47,550 children) registered and staying in Moldova, only around 4% (1,847) are officially enrolled in Moldovan schools. The rest of the Ukrainian children are believed to be accessing education primarily through online schooling provided by the Ukrainian Ministry of Education Platform, although this is not systematically tracked. A Back-to-School campaign was recently launched by MER targeting, among others, displaced Ukrainians residing in Moldova.

MER has established a Webpage for the enrollment of Ukrainian children in Moldovan schools. Updated enrollment procedures were published taking into consideration implementation of temporary protection. *See* https://mec.gov.md/ro/content/v-podderzhku-detey-i-molodezhi-ukrainy.

PWG members have heard that some local schools and universities are not fully aware of how temporary protection affects the ability of refugees to enroll for studies.

The ***PWG recommends*** that MER (1) clarify the enrollment status of Ukrainian children in Moldova who have not applied for TP after 13 August; and, (2) ensure that public schools and universities are fully informed of the temporary protection legal regime and how it affects the enrolment process for Ukrainian children.