



# RECOMMENDATION NOTE – CALL to ACTION

## PROTECTION of HUNGARIAN NATIONALS FLEEING the RUSSO-UKRAINIAN CONFLICT

### Introduction.

Among individuals and families fleeing Ukraine after the escalation of the conflict in February 2022 and seeking protection in Hungary, there are Hungarian nationals who used to reside in Ukraine and hold citizenship of both Hungary and Ukraine. They were forced to leave their homes due to armed conflict and are in need of protection and assistance in Hungary, even though they do not qualify for Temporary Protection (TP). At the same time, as newcomers or first-time residents in Hungary, they do not always enjoy unhindered access to services as citizens due to administrative and bureaucratic hurdles.

This note aims to identify the vulnerabilities and specific challenges this group faces in accessing services and formulate recommendations to improve their protection and inclusion across Hungary.

The note encourages a stronger collaboration with Hungarian authorities to navigate the legal and administrative complexities surrounding the status and rights of dual nationals, ensuring they receive adequate support and protection, as citizens.

Joint partnerships between humanitarian actors, civil society, and the government will facilitate the development and implementation of tailored integration programs that address the barriers Hungarian citizens who fled the war in Ukraine face in accessing services and assistance in Hungary.

This note is a joint effort by Menedek, Hungarian Helsinki Committee, Romaversitas, IOM, and UNHCR, supported by the [Inclusion Working Group](#), [Basic Needs Working Group](#) and the [Protection Working Group](#) within the framework of the [Refugee Coordination Forum](#). It is based on consultation with dual nationals residing in Hungary.

*"In Ukraine we were considered as Hungarians and here we are seen as Ukrainians. We are always in a foreign country, we are always strangers, no matter how well you speak the language."*

*(27-year-old woman from Zakarpatska/Ukraine, living in Budapest with her husband and daughter).*

### KEY TECHNICAL GLOSSARY

Dual Nationals	Permanent Residence	Temporary Protection (TP)	Government Decree 86/2022
Individuals holding citizenship in two countries (for this note, Ukraine and Hungary) and entitled to legal rights and responsibilities in each country. Also known as dual citizens or citizens of two countries.	The address which serves as the basis for a person's rights and obligations. <sup>1</sup>	An exceptional measure activated by the European Union (EU) to provide immediate and temporary safeguarding for displaced persons fleeing the Russo-Ukrainian conflict.	Decree issued by the Hungarian government, implementing the TP regime in the country and defining regulations concerning individuals fleeing the Russo-Ukrainian conflict.

<sup>1</sup> Article 5 (2) of the Act LXVI of 1992 on the registration of personal data and addresses.



## Demographic Insights and Profile.

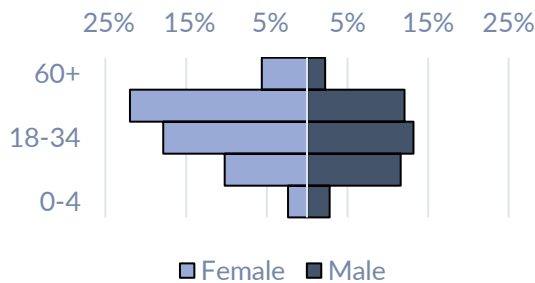
The Ukrainian region of Zakarpattia, situated in the southwestern part of the country, has historically been home to a population of ethnic Hungarians:<sup>2</sup> as per the last [Ukrainian census \(2001\)](#), 156,000 ethnic Hungarians resided in Ukraine before the conflict, mostly concentrated in Zakarpattia (95%). By contrast, the Hungarian minority constitutes 12% of the population in Zakarpattia and 0.3% of Ukraine's total population. Despite the relatively lower conflict intensity experienced in Zakarpattia,<sup>3</sup> the consequences of the war have been palpable there through the influx of 67,000 internally displaced persons into the region, economic and service deterioration, and the introduction of a countrywide martial law.<sup>4</sup> Although exact numbers remain hard to estimate, since February 2022 many have crossed the border to Hungary to seek safety and protection.

The [2023 Multi-Sector Needs Assessment \(MSNA\) in Hungary](#) revealed insights into the demographic

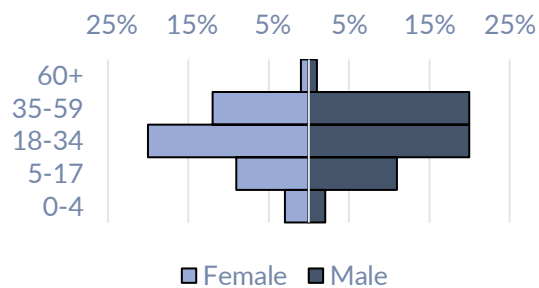
composition and legal status of dual nationals in Hungary. The MSNA helps draw the distinction between the Hungarian minority in Ukraine and dual nationals: while there is a correlation between the two, not all Ukrainian citizens with Hungarian heritage possess Hungarian citizenship, and not all dual nationals self-identify as Hungarian.<sup>5</sup>

The 2023 MSNA shows that dual nationals, with an average household size of 2.1 (consistent with the overall average), tend to reside in Budapest (one-third, consistent with the average) and the Szabolcs-Szatmár-Bereg region (15% vs 8% in average). They favor mainly private accommodation arrangements (69% vs 49% as average) and are more likely to bear full accommodation expenses compared to the overall average (63% vs 33%). Gender and age distributions are shown in the population pyramids, with notable differences in the prevalence of men (40% vs average of 25%).

Demographic profile - All households



Demographic profile - Dual nationals



<sup>2</sup> The history of the Hungarian minority in Ukraine is intertwined with the complex events that have shaped the region over centuries. After World War I and the collapse of the Austro-Hungarian Empire, the Zakarpattia region became part of Czechoslovakia under the Treaty of Trianon (1920) and was later annexed by the Soviet Union (1945). Despite assimilation policies introduced by Moscow, Zakarpattia remained a multicultural region, with Hungarians, Ukrainians, Rusyns, and others coexisting. Since the Soviet Union's disintegration in 1991, Zakarpattia has retained its status as an administrative region within Ukraine.

<sup>3</sup> Since February 2022, Zakarpattia has not been occupied by Russian armed forces and experienced sporadic bombings, with three incidents recorded, making it one of the least affected regions in terms of direct conflict ([ACLEED/Ukraine](#)). See also a study of key conflict dynamics in the region by [International Alert, Situational Analysis - Zakarpattia Region \(2019\)](#).

<sup>4</sup> On February 24, 2022, with the instruction of the Martial Law in Ukraine (Decree No. 64/2022, [Official website of the President of Ukraine](#)), male citizens of Ukraine ages 18–60 are prohibited from leaving their place of permanent residency without the approval of the local military administration ([Library of Congress](#)).

<sup>5</sup> Distinguishing between dual nationals and the Hungarian minority in Ukraine is important, as the latter qualify for TP in Hungary if without Hungarian citizenship. As per MSNA respondents, 1 in 4 self-identified as ethnic Hungarian, with 75% of them reporting both Hungarian and Ukrainian nationality (this means not all self-identified Hungarian background are dual nationals, 25% is not). Among dual nationals, 1 out of 4 do not self-identify as Hungarian but rather as Ukrainian or Roma. Also, a small percentage of respondents preferred not to disclose. These MSNA data point to the complexity and the sensitivity surrounding dual nationality. [Methodological note: a purposely-set 25% cap on dual nationals in sampling affects the figure; also, the nationality was asked at the household level, assuming respondent status applies to all household members].



## Challenges Facing Hungarian Nationals who fled Ukraine.

As Hungarian citizens, dual nationals can enter Hungary anytime and stay without any restrictions. Although not eligible for temporary protection,<sup>6</sup> dual citizens who fled Ukraine to Hungary are entitled to all the benefits that come with the TP status, as they find themselves in a refugee situation and are in need of humanitarian support and assistance. This is unless they are eligible for preferential treatment due to their Hungarian nationality. This provision, defined in Section 8 of Government Decree 86/2022, highlights the government's commendable commitment to equitable treatment and support for all individuals seeking protection and assistance, regardless of their citizenship status, fostering inclusivity and protection in times of crisis.

It may be surprising to note that in the 2023 MSNA, dual nationals were on equal footing with TP holders regarding their level of protection and socio-economic inclusion. The data suggests that even with citizenship status and familiarity with the language, the displacement and war have hindered their potential for inclusion in Hungary. In fact, while dual nationals generally exhibit lower vulnerability<sup>7</sup> and healthcare needs,<sup>8</sup> along with slightly higher employment rates<sup>9</sup> and decreased reliance on social protection benefits,<sup>10</sup> challenges persist in accessing protection, basic services, and socio-economic integration, as evidenced by the non-exhaustive list of barriers described here.

Due to different interpretations of the legal provisions by service providers, administrative hurdles, and cases of discrimination, practical challenges remain. In these instances, some Hungarian nationals fleeing war seem to be deprived of the benefits and support to which the legislator initially intended them to be entitled. Here is a non-exhaustive list of issues.

**Section 8 (1) of Government Decree 86/2022** of 7 March on emergency rules for persons recognized with temporary protection and related acts in Hungary:

*“All benefits and support provided to beneficiaries of temporary protection shall also be provided to Hungarian nationals, who are permanent residents of Ukraine and arrived from Ukraine on or after 24 February 2022, unless they are entitled to more favorable treatment by virtue of Hungarian nationality.”*

**Interpretation of Section 8.** Dual nationals may encounter legal obstacles and legal ambiguities regarding their status, rights, and entitlements upon entering Hungary. Specifically, dual nationals struggle to demonstrate their arrival in Hungary after February 24, 2022, mainly because they habitually use two passports when crossing borders (without a visa or stamp on either passport), which affects the applicability of Section 8. Furthermore, some dual nationals who move their permanent residence from Ukraine to Hungary encounter obstacles in accessing the benefits reserved for TP beneficiaries, including free health care and subsistence allowance, due to service providers' restrictive interpretation of Section 8 to exclude dual nationals who no longer reside in Ukraine.<sup>11</sup>

*“We don't feel at ease here in Hungary, given our lack of socialization and familiarity with legal matters. Personally, I don't find this discomforting, but rather, I actively work to address any issue that arises.” - A 46-year-old man*

<sup>6</sup> As Hungarian citizens, they are also EU citizens and, therefore, not eligible for TP, TP rights, and entitlements in other EU countries. Issues for dual nationals holding TP status are arising, see the re-verification of over 5,000 TP applications with dual nationality in March 2024 in Germany ([RTL](#) and [Spiegel](#)).

<sup>7</sup> Fewer older individuals (2% vs 8% on average), chronic medical conditions (10% vs 21% on average), mental health concerns (2% vs 7% on average), and forms of disabilities (1% vs 7% on average) are recorded.

<sup>8</sup> Lower prevalence of healthcare needs (22% vs 31%) and easier access to healthcare, with a lower prevalence of unmet healthcare needs (4% vs. 12 on average), probably due to the knowledge of the Hungarian language.

<sup>9</sup> Slightly higher rate of households with at least one working member (86% vs 78% on average), even though households' monthly income from employment and expenditure patterns are comparable with that of all respondents.

<sup>10</sup> Lower dependency on social protection benefits in the last 30 days (9.5% vs 28%). While a higher proportion of dual nationals reported having no priority needs (40% vs 25% on average), yet for those who indicated challenges in meeting basic needs, the top 3 areas in which their household needed support, excluding language courses, were similar: accommodation, food and employment.

<sup>11</sup> Many Hungarian nationals from Ukraine establish permanent residence in Hungary upon arrival, to facilitate their day-to-day affairs, in accordance with Section 5 (2) of Act LXVI of 1992 on the Registration of Personal Data and Address of Citizens. This is done by simultaneously terminating their permanent residence in Ukraine.



Such interpretation exacerbates the challenges faced by vulnerable individuals, in particular for chronic conditions, when seeking assistance in Hungary. In addition, while TP holders and Hungarian citizens with residence abroad are provided with a technical ID number to access a range of health services (currently, doctors or healthcare providers provide this ID during the initial visit), healthcare professionals often lack familiarity with this administrative task when dealing with dual nationals with residence in Ukraine (as they think it applies only to TP holders), leading to confusion and potential denial of service.

**Social security.** Hungarian nationals from Ukraine can encounter bureaucratic challenges in accessing insurance status in Hungary, as TAJ number is not based on nationality.<sup>12</sup> A TAJ number is not given automatically to dual nationals from Ukraine. To qualify, they must meet several conditions: they need to either be employed or self-employed in Hungary or be registered as permanent residents of Hungary for at least a year, and they must actively pay social security contributions;<sup>13</sup> or demonstrate eligibility for subsidized social assistance (provided for free by the government, based on the assessment of individual vulnerable circumstances). Dual nationals, in addition, need to produce official documentation from Ukrainian authorities confirming their non-enrollment in the Ukrainian social security system. This last requirement is arduous, expensive, and potentially dangerous due to the ongoing conflict; translation into Hungarian of the document is also requested. Additionally, government offices exhibit inconsistent practices in document requirements for obtaining TAJ cards, exacerbating the situation.

*“Though I’ve been enrolled with the health insurance since 2016, living outside Hungary meant it went unpaid for years. I got cancer, which I could no longer treat in Ukraine due to the war, and we fled to Hungary. But I couldn’t reinstate my social security in Hungary unless I had held a registered Hungarian address for a year. Obtaining accurate information proved challenging.” (27-year-old woman)*

**Information on the specificities of their legal condition.** Dual nationals face challenges accessing comprehensive information regarding their legal status, rights, and entitlements.<sup>14</sup> It is a recurrent observation that dual nationals frequently miss out on subsistence and family allowances due to a lack of information about administrative procedures. While language is not an issue (as it is for most TP holders who only speak Ukrainian or Russian), dual nationals struggle to find accurate and reliable sources of information due to the specificities of their circumstances, entitlements, rights, and responsible authorities.

**Discrimination and stigma.** Hungarian dual nationals (and in general Ukrainians fleeing Zakarpattia) are often perceived as “not real refugees” due to the lower conflict intensity in the area, which in turn affects the way they are treated by accommodation sites, healthcare providers, the access to donations and other social support system. Among dual nationals, there are also Roma families, and many face bias and discrimination, reflecting systemic barriers to essential services and biased attitudes toward the Romani community.<sup>15</sup> They are especially vulnerable due to episodes of hostility and exclusion by service providers. They encounter reluctance from schools to enroll children (and instances of denial of free meals in the absence of a registered Hungarian address), and difficulties renting accommodation. Dual citizenship among Romani from Ukraine poses concerns as it can perpetuate discriminatory practices, leading to Romani individuals being denied benefits due to the administrative hurdles towards Hungarians from Ukraine and prejudicial attitudes towards Roma in general.

*“All my family has Hungarian citizenship; however, we ran into huge problems upon arrival. If you don’t have a residence address, a registered Hungarian address, you can’t apply for social security” (27-year-old woman)*

<sup>12</sup> To access the social security system, including health insurance, pension contributions, and other social benefits, a social insurance identifier is needed in Hungary, the TAJ (*Társadalombiztosítási Azonosító Jel*).

<sup>13</sup> If they are not employed/self-employed, there is a one-year requirement of out-of-pocket social security contribution ([NEAK](#) pages 24-25).

<sup>14</sup> According to MSNA 2023, 32% of households faced challenges accessing information, with difficulties attributed to language barriers (53%), uncertainty about where to find information (40%), and uncertainty about which sources to trust (31%). However, among dual nationals, the percentage reporting challenges dropped to 18%. The main reasons cited were a lack of accessible information sources or trust issues, both at 43%.

<sup>15</sup> For more information: [RCF Note on Inclusion of Romani Refugee Inclusion](#) and Hungarian Helsinki Committee: [The Situation of Romani Refugees Fleeing Ukraine](#) reporting experiences gathered in the framework of the Ukraine refugee crisis response of the Hungarian Helsinki Committee 20 April 2023; and Romaversitas, [The situation of Transcarpathian Romani families fleeing from Ukraine to Hungary, 2022](#).



**Employment.** In practice, dual nationals without a TAJ card face difficulty accessing employment, as employers demand the card as a condition for recruitment despite their responsibility to notify the government office for first-time applicants. Additionally, similarly to TP holders, they are at risk of exploitation, as instances were collected of dual nationals falling victim to misleading promises from employers regarding housing and childcare support associated with the employment opportunity, exacerbating their vulnerabilities and integration challenges (MSNA Focus Group Discussion).

*"Some big employers promised jobs to mothers, with nursery, kindergarten and schooling for children. They did not keep the promise. They took us and the children to a workers' hostel. It consisted of one room. You can't raise a child there; other workers are often drunk. you don't want your child to see that."  
(25-year-old woman)*

*"Employers often don't declare full 8-hour contracts; at least, most of them don't. Even though they work 10, maybe 12 hours, they get only 4-hour declared on the contract. This is a problem; the bank will not give you a loan." (27-year-old woman)*

**Accommodation.** In Hungary, Defense Committees assign subsidized accommodation to new arrivals from Ukraine. The accommodation is restricted to one parent per family. As there is a higher concentration of men aged 18-59 among dual nationals, it is more likely that both parents are in Hungary, making this policy particularly penalizing for them. Individuals not qualifying for subsidized housing can request placement in NDGAP shelters;

however, since the NDGAP primarily serves non-Hungarian nationals, accessing these shelters might prove difficult for dual nationals, particularly in regional offices where they could face rejection.

*"We couldn't find an apartment for a long time; many landlords canceled our application when they heard we were from Transcarpathia and had two children. Others told us they would not rent to us because we are from Transcarpathia. Others did not trust Hungarians from Transcarpathia as they did not behave, didn't take care of the house, and destroyed flats. " (36-year-old woman)*

**Future perspectives.** Like TP holders, Hungarian nationals from Ukraine do not consider current conditions conducive to return. When prompted about long-term intentions, most respondents (2 out of 3) indicated that they are currently not considering returning permanently to Ukraine within the next year, even though they do hope to return permanently one day (half of the respondents). Most respondents (3 out of 4) do not have a concrete timeframe in mind for when to stay and live in Hungary, either saying they do not know or want to remain as long as possible.<sup>16</sup> It is, therefore, important to address these barriers to ensure protection and access to essential services of Hungarian nationals from Ukraine as soon as possible.

*"I don't see any other option in the long term besides remaining in Hungary. I think it will be a long time before we can return home. I don't know what sort of fate awaits us in Ukraine as Hungarians." (27-year-old woman)*

<sup>16</sup> Analysis of results from UNHCR's regional intention survey, refugees from Ukraine who reside in Hungary and originate from Zakarpattia (n=9) were used as a proxy for dual nationals since the legal status did not include this option.



## Key Recommendations.

**R1. Address the legal, administrative, and bureaucratic barriers hindering access to essential services, including healthcare and financial assistance, for Hungarian citizens who have fled the war in Ukraine, and ensure equal access as citizens without discrimination based on their place of residence.**

Upon arrival, for newcomers:

- **Amend Section 8(1) of Government Decree 86/2022:** Consider amending the section to explicitly include Hungarian nationals who used to reside in Ukraine before February 2022, regardless of their current residence status, until they can effectively benefit from rights and services available to citizens. Alternatively, issue a circular to clarify the interpretation of Section 8(1) to ensure equitable treatment, regardless of country of residence.
- **Ease access to Technical ID for Healthcare:** Implement a systematic approach to ensure Hungarian nationals arriving from Ukraine have immediate access to the technical ID required for healthcare services. Consider issuing the special identification number through centralized bodies like local government offices or the NDGAP to streamline the process and prevent potential denials or confusion by healthcare professionals.

For mid- to long-term inclusion:

- **Grant access to social services:** Grant Hungarian nationals access to the full range of social services available under the Social Act, irrespective of where their permanent residence is registered, if they arrive in Hungary on or after February 24, 2022. Also, provide severely disabled Hungarian nationals over the age of 18 with access to the disability allowance, in accordance with Act XXVI of 1998 on rights and equal opportunities for people with disabilities, regardless of their residence status, if they arrive in Hungary on or after February 24, 2022.

- **Streamline Issuance of TAJ Cards:** Facilitate and speed up the issuance of TAJ cards by issuing explicit, official directives outlining the prerequisites for obtaining a TAJ number, including for specific groups such as children, pensioners, etc. This measure aims to prevent discrepancies in procedures across various government offices. Additionally, consider accepting alternative forms of documentation, such as official self-declarations, in lieu of official paperwork from Ukrainian authorities confirming non-enrollment in the Ukrainian social security system (for adults and children).

**R2. Enhance information provision tailored to dual nationals' specific situations, as it is crucial to effectively address legal obstacles and uncertainties upon entering Hungary.**<sup>17</sup> The partnership among relevant authorities, humanitarian organizations, and civil society is essential to ensure easily accessible and reliable information and support services are available (collaborative partnership). Examples of joint activities are tailored information campaigns, integration of dual nationals information in existing community centers,<sup>18</sup> capacity sharing with frontline staff and service providers.<sup>19</sup> Additionally, service providers should ensure that the website/material /hotline is available in Hungarian, clear information is provided on the action required and rights of dual citizens (not just TP holders), and train government service providers on the entitlements of dual nationals. This should be accompanied by expanding legal and paralegal support regarding procedures, rights, and entitlements.

**R3. Promote non-discriminatory socio-economic inclusion for dual nationals: all service providers, governmental and non-governmental, must ensure that dual nationals are treated and engaged with dignity and respect, regardless of their nationality or ethnic origin, and their socio-economic inclusion is promoted, acknowledging that being fluent in Hungarian alone is not sufficient for effective inclusion and meaningful participation into society.**

<sup>17</sup> Among the currently available sources of information for dual nationals: [Safe in Hungary](#) (government) and [Hungarian Helsinki Committee](#).

<sup>18</sup> Consider integrating existing community centers or hotlines where refugees can seek assistance, obtain legal advice, and access other essential services with information for dual nationals as well.

<sup>19</sup> Conduct sessions for frontline staff at immigration checkpoints, community centers, service providers and relevant government agencies. This will enable them to provide accurate information and guidance to individuals in need and ensure timely referrals of cases.



- **Combat Discrimination:** regional and EU-level actors and legal NGOs should actively raise awareness about the instances of discrimination and exclusion experienced by Romani refugees with dual citizenship, the vulnerabilities of marginalized groups outside the scope of the TP, and promote inclusive and culturally sensitive practices through campaigns, workshops, and events organized around the situation of Romani refugees. Also, plan for complex mentorship / support in everyday life and include Roma experts in planning and implementing community projects. The presence of Roma experts and social workers at several shelters helps develop appropriate and culturally sensitive services.
- **Strengthen access to accommodation** through clear regulation on accessing shelters and family support:
  - Provide clear legal regulations detailing the process for placing individuals in accommodation sites. This will ensure transparency and accountability in the placement process.
  - Implement measures to support accommodation sites in accommodating families with minor children. This support should be extended after both parents to prevent the separation of families

and ensure their unity during this challenging period.

- **Engage dual nationals in outlining future integration perspectives** and other sustainable solutions for the post-war period while mainstreaming the inclusion of dual nationals in the general inclusion policies (*'társadalmi felzárkózás*).
- **Organize cultural events** targeting people who live in Hungary for the first time to complement the ones currently (and mostly) organized only in Ukrainian.

**R4. Collect Data: Expand data collection of Hungarian citizens who have fled the war in Ukraine, as most data is currently on TP holders. This should include analysis at the intersection of specific vulnerabilities; publicly available databases on refugees are essential for the design of targeted and appropriate services and for understanding the evolving needs and vulnerability as well as levels of integration.**

## Contacts.

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