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Polina and Oleksandr are refugees from Ukraine. © Vincent Tremeau/UN Human Rights

The human right to equality and non-discrimination: the experience of refugees from Ukraine on both banks of the Dniester/Nistru River

**Republic of Moldova
2025**

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Executive Summary

The Discrimination assessment Report titled **“The human right to equality and non-discrimination: the experience of refugees from Ukraine on both banks of the Dniester/Nistru River”** was prepared by UN Human Rights Moldova within the framework of the project “Improving equal access to services and assistance for refugees with special needs and the most vulnerable members of the host community in Moldova, including the left bank of the Dniester/Nistru River”, funded by DGECHO.

The comprehensive assessment aims to determine whether the most vulnerable refugee groups have experienced any discrimination or marginalization in their attempt to access public services or humanitarian assistance since their arrival in Moldova, including the left bank of the Dniester/Nistru River, and how such experiences of discrimination (if any) have affected their lives. The assessment explored issues related to social cohesion and social tensions between refugees and host communities.

The main findings show that the entry into force of the Government Regulation “On Providing Temporary Protection to Persons Displaced from Ukraine” in March 2023 has provided refugees with a more predictable legal status, although some still lack legal status. Roma refugees have applied for Temporary Protection less frequently, but generally had positive experiences, largely due to the support from the Roma community mediators. In contrast, Third-Country Nationals (TCNs), especially citizens of the Russian Federation, faced negative attitudes and discrimination based on nationality and/or citizenship when applying for refugee status.

Geographical location significantly influenced refugees’ experiences:

- ⇒ **Right Bank of the Dniester/Nistru River:** Refugees had relatively better access to services and support networks. They benefited from improved infrastructure, stronger legal support, and better coordination between governmental and non-governmental organizations. However, challenges persisted, including bureaucratic difficulties, occasional discrimination in accessing services, and difficulties with labor market integration.
- ⇒ **Left Bank of the Dniester/Nistru River:** Refugees faced more severe challenges, particularly regarding legal documentation, access to healthcare and employment opportunities. Discrimination in healthcare access was a serious problem on both banks but was more acute on the left bank, especially for Roma refugees and people with disabilities. Barriers included limited services availability, physical and informational inaccessibility, affordability and poor quality of healthcare services.

Negative attitudes from healthcare providers and a lack of understanding of the legal framework were common on both banks but were more pronounced on the left bank of the Dniester/Nistru River.

Recommendations include improving data collection on refugees with Temporary Protection, raising awareness among public servants and healthcare professionals about non-discrimination principles, and fostering social cohesion between refugees and host communities.

This executive summary highlights the need for ongoing efforts to address discrimination and enhance the inclusion of refugees in Moldova, with attention to vulnerable groups and geographical disparities between the right and left banks of the Dniester/Nistru River.

Methodology

UN Human Rights' assessment took place in two phases. The **first phase consisted of a desk review of secondary data** undertaken in November 2023, which sought to identify available information on discrimination faced by refugees from Ukraine, including by specific groups, in accessing different human rights. The desk review focused on the topics such as crossing the State border; access to humanitarian assistance; access to housing (including experiences with Refugee Accommodation Centers (RACs) on the right bank of the Dniester/Nistru River and renting apartments); education; healthcare; and employment. The desk review also examined tensions between refugees and host communities stemming from perceived favoritism in aid distribution and competition for resources. Overall, UN Human Rights reviewed twenty different sources, including Concluding Observations from Treaty Bodies; recommendations adopted by the Republic of Moldova in the last cycle of the Universal Period Review; studies by the National Human Rights Institutions; reports by UN agencies, international non-governmental and civil society organizations.

The **second phase** of the assessment **involved the collection and analysis of primary data**, aiming to fill gaps identified in the desk review and corroborate or refute the secondary data. UN Human Rights used a mixed methodology to collect primary data, consisting of:

- ⇒ 1,334 **individual interviews** with refugees from Ukraine residing on both banks of the Dniester/Nistru River (carried out between July 2023 and April 2024), ensuring wide geographical coverage;
- ⇒ **Seven Focus Group Discussions (FGDs)** involving a total of 67 participants (including 42 women);
- ⇒ **Seven Key Informants Interviews (KIIs)** with representatives from National Human Rights Institutions, UN agencies, INGOs and CSOs (conducted between mid-January and mid-April 2024).

All interviews and FGDs were conducted in person. The tools used included questions on discrimination faced by refugees from Ukraine in different spheres of their life in Moldova, including the right bank of the Dniester/Nistru River, such as arrival to Moldova and access to legal status, humanitarian assistance, housing, education, healthcare, and employment.

UN Human Rights conducted all data collection exercises in alignment with fundamental human rights monitoring principles, including *Do No Harm*, respect of confidentiality, informed consent, and integration of gender and disability aspects of respondents.¹

The seven FGDs were conducted as follows:

- ⇒ One with Third-Country Nationals (citizens of the Russian Federation)² previously residing in Ukraine and currently living on the right bank of the Dniester/Nistru River;
- ⇒ Two with refugees with disabilities including some older refugees (one on the Right Bank and one of the left bank of the Dniester/Nistru River);
- ⇒ Two with refugees of Roma ethnicity (one on the Right Bank and one of the left bank of the Dniester/Nistru River);
- ⇒ Two with Roma community mediators (one on the Right Bank and one on the left bank of the Dniester/Nistru River).

To ensure the confidentiality of the information provided and to protect the sources, this report withholds any Personal Identifiable Information (PII).

¹ UN Human Rights, Manual on Human Rights Monitoring, Chapter 02, Basic principles of human rights monitoring. <https://www.ohchr.org/sites/default/files/Documents/Publications/Chapter02-MHRM.pdf>.

² UN Human Rights focused on this specific group of asylum seekers to address a gap in information that was noted in the humanitarian response, in alignment with the Leave No One Behind principle.

Findings are based on a thorough analysis of information that was assessed as credible and reliable, based on UN Human Rights standard of proof of “*reasonable grounds to believe*” that the facts took place as described. Findings were validated during two public consultations taking place on 12 and 27 June 2024 on the right and the left banks of the Dniester/Nistru River, respectively. All information in this report is used in full respect of free, prior and informed consent of all sources.

Chapter 1: Arrival to Moldova and legal stay

Part I: Context overview

From the beginning of the Russian Federation large-scale invasion of Ukraine on 24 February 2022, the government of Moldova has welcomed refugees onto its territory and took prompt measures to extend them protection, in line with the Global Compact on Refugees.³ The government immediately declared a State of Emergency for an initial period of 60 days, which was extended multiple times until 30 December 2023.⁴ During this period, the Commission for Emergency Situations (CES) regulated refugees' legal stay in the country.

On 18 January 2023, the government adopted a decision granting Temporary Protection to displaced persons from Ukraine.⁵ The Temporary Protection legal regime was activated on 1 March 2023, ensuring access to a more stable and predictable legal status for displaced people from Ukraine.⁶ On 10 May 2023, the Commission for Emergency Situations adopted a new decision regulating the stay in Moldova of Ukrainian citizens and Third Country Nationals (TCNs) fleeing Ukraine.⁷ This Government Regulation "On Providing Temporary Protection to Persons Displaced from Ukraine" established that, as of 15 May, Ukrainians and TCNs had time until 15 August 2023 to apply for Temporary Protection. Failure to do so would result in falling outside of legal status. This measure led to a significant increase in Temporary Protection registrations, which continued in the following months. On 28 February 2024, the government decided to extend the Temporary Protection regime until 1 March 2025.

According to data of the Government of the Republic of Moldova and UNHCR, as of 31 January 2025, **127,786** refugees from Ukraine were recorded in the country.⁸ The Moldova Inter-Agency Refugee Response Plan for 2023 (RRP 2023) indicates that the refugee' population consists mainly of women (68%); children (33%); and older persons (21%). Other groups facing greater marginalization include children; persons with disabilities; older persons; Roma people; persons living with HIV; LGBTIQ+; single mothers; families with many children.

As of 7 October 2024, 76,202 people were registered in the General Inspectorate for Migration (IGM) information system, and 60,711 of them (including 15,902 minors) were issued Temporary Protection Identity Documents. While this data is disaggregated by gender, age, and place of residence, it does not include details on disability status or ethnicity. Of these, 3,824 individuals residing on the left bank of the Dniester/Nistru river have Temporary Protection legal status.⁹ Although no official data exists on the total number of refugees residing on the Left Bank, initial estimates since the beginning of the refugee influx place the figure at 8,000 to 10,000. This suggests that a high proportion of refugees living on the left bank of the Dniester/Nistru river obtained Temporary Protection.

Furthermore, as of 7 October 2024, 1,468 people were registered in the asylum system, including:

- ⇒ 1 person with refugee status;
- ⇒ 193 beneficiaries of humanitarian protection, and
- ⇒ 1,274 asylum seekers with pending applications.¹⁰

³ [Ukraine Situation: Regional Refugee Response Plan - January-December 2023, Moldova chapter.](#)

⁴ [Decision No. 41 of 24.2.2022 of the Parliament of the Republic of Moldova declaring a state of emergency.](#)

⁵ [Government decision No. 21 of 18.1.2023 on the granting of Temporary Protection to displaced persons from Ukraine.](#)

⁶ [Ukraine Situation: Regional Refugee Response Plan - January-December 2024, Moldova chapter.](#)

⁷ [Commission for Exceptional Situations of Moldova, Disposition number 68 of 10 May 2023.](#)

⁸ [UNHCR Operational Data Portal, Republic of Moldova.](#)

⁹ [Weekly statistics of the General Inspectorate for Migration, lastly accessed on 25 May 2024.](#)

¹⁰ [Protectia internatională și documentarea ucrainenilor în Republica Moldova - Inspectoratul General pentru Migrație | Ministerul Afacerilor Interne \(gov.md\).](#)

In the Republic of Moldova, there are four forms of international protection: **refugee status, humanitarian protection, temporary protection, and political asylum**, as defined by Law 270/2008 on asylum.¹¹ **Refugee status** is granted based on the 1951 Refugee Convention, ratified by Moldova in 2001. **Humanitarian protection** is given for risks not covered by the Convention. **Temporary protection** addresses mass influxes of displaced persons, while **political asylum** is granted by the President in exceptional cases.

The Republic of Moldova activated the Temporary Protection regime for the first time during the Ukraine refugee crisis. Eligible persons included:

- ⇒ Ukrainian citizens residing in Ukraine before 24 February 2022;
- ⇒ Ukrainian citizens already in Moldova before that date;
- ⇒ Stateless persons and third-country nationals who had international or equivalent protection in Ukraine before 24 February 2022 and cannot safely return to their country;
- ⇒ Family members of these groups.

Part II. Findings

UN Human Rights protection monitoring data revealed that 71% of respondents (75% on the Right Bank and 59% on left bank of the Dniester/Nistru River) applied for Temporary Protection status. Of those who applied, 91% received it (91% on the Right Bank and 88% on left bank of the Dniester/Nistru River). These figures need to be interpreted considering the sample size of UN Human Rights interviews. Among the 29% who did not apply, reasons included seeking other legal statuses, not seeing benefits, and lacking knowledge on how to apply. In 2024, UN Human Rights observed an increased interest in obtaining Temporary Protection status, as having that status directly affects the possibility of realizing other rights (legal status and avoidance of fines for violation of the terms of stay, receipt of cash payments, enrolment of children in school, etc.). Since October 2023, enrolment in Temporary Protection has increased, partly due to changes linking legal status to cash assistance eligibility.¹²

The following section will analyze the experience of arrival to Moldova, including the left bank of Dniester/Nistru River and legal status for different groups of persons displaced from Ukraine.

Arrival to Moldova and legal status for Third Country Nationals who arrived from Ukraine

According to protection monitoring data, 7 out of the 11 interviewed Third Country Nationals had applied for and received Temporary Protection. This includes individuals included citizens of Russia, Azerbaijan, Tajikistan, and Turkey who, at the time the war in Ukraine began, had residence permits in Ukraine or were family members of a person's eligible for Temporary Protection.

UN Human Rights documented the specific situation of seven citizens of the Russian Federation who applied for asylum. Despite having Russian citizenship, most of them had lived in Ukraine for a large part of their lives and had a residence permits. When the war started, they were deprived of their residence permits and ordered by the authorities to leave Ukraine within one month due to their citizenship. Overall, crossing the border from Ukraine to Moldova did not pose any significant challenge for this group, including for those with expired Russian passport.

¹¹ <https://cda.md/usefulinformation-for-beneficiaries/>

¹² <https://help.unhcr.org/moldova/2023/12/05/refugee-cash-assistance-updates-in-moldova/>.

All the focus group participants were ineligible for Temporary Protection status, as they did not fulfill the stipulated criteria for third-country nationals. Specifically, they were not beneficiaries of international protection, or an equivalent national protection conferred by Ukrainian authorities prior to 24 February 2022, which could not safely return to their countries of origin but given residence permit.¹³ These residence permits were effectively revoked by the Ukrainian authorities following the outbreak of the war. Consequently, they were excluded from the Temporary Protection framework and subsequently sought refugee status in Moldova.

A few participants reported **negative attitudes by employees of the General Inspectorate for Migration**. Remarks such as: *"You have a Russian passport, do not even think about getting legal status"* or *"The war in Ukraine started because of people like you"* were cited. Five participants had their asylum applications rejected and appealed in court. The remaining participants of the focus group discussion were awaiting a response to their inquiry at the time the discussion was conducted.

Arrival to Moldova and legal status for Roma refugees from Ukraine

Roma refugees residing on **the right bank of the Dniester/Nistru River, who participated in the focus group discussion**, reported an overall positive experience with the border crossing from Ukraine to Moldova and warmly received by volunteers who demonstrated a welcoming attitude. All respondents had sought Temporary Protection and successfully received it, with no reported incidents of negative attitude or discrimination during the registration process. Nonetheless, UN Human Rights received a report from a civil society organization representative in the northern part of the country regarding the denial of Temporary Protection registration to a Roma refugee, coupled with an incident of physical violence.

Roma refugees on **the left bank of the Dniester/Nistru River** faced various challenges upon arrival in Moldova and in securing legal status. UN Human Rights received reports of illegal border crossings from Ukraine through the Transnistrian region, resulting in arrests, fines, and expulsion to the right bank of the Dniester/Nistru River. Also, Roma refugees faced rejection when trying to pass from the right to the left bank of the Dniester/Nistru River. The main reason for refusal was that Roma refugees could not prove they had relatives on the Left Bank, even in cases where such relatives existed. Securing longer or permanent registration, which is essential for employment on the Left Bank, posed significant challenges. A de facto rule required refugees to have relatives with permanent registration on the Left Bank to qualify for permanent registration themselves. Despite these barriers, some Roma refugees have had positive experiences of moving between the banks, as well as with registration and obtaining Temporary Protection.

UN Human Rights data on the basis of individual interviews found that 68% of Roma refugees (71% on the Right Bank and 56% on the left bank of the Dniester/Nistru River) applied for Temporary Protection status. Of those who applied, 77% (76% on the Right Bank and 80% on the left bank of the Dniester/Nistru River) received a Temporary Protection Identity card. Among the 22% who did not apply, the main reason cited was their belief that there were no benefits in obtaining Temporary Protection status.

Additionally, a representative from NGO "OSORC" reported that Roma refugees are barred from entering the RAC "Solnechnyi" facility due to a past incident involving property destruction by a Roma family. This ban highlights ongoing challenges and discrimination towards Roma refugees in accessing essential services and facilities.

¹³ During the "Public consultations on the report on discrimination faced by refugees from Ukraine in Moldova" held on 12th June, the Ombudsman recommended that the State expand the eligibility criteria for Temporary Protection to allow Third-Country Nationals (TCNs) to apply.

Arrival to Moldova and legal status for refugees from Ukraine with a disability

UN Human Rights protection monitoring data found that 67% of refugees from Ukraine with disabilities (70% on the Right Bank and 60% on the left bank of the Dniester/Nistru River) applied for Temporary Protection status. Of those who applied, 92% (95% on the Right Bank and 81% on the left bank of the Dniester/Nistru River) received a Temporary Protection Identity card. Among the 33% who did not apply, the main reasons were seeking another legal status and not knowing how to apply.

With regards to the host community's attitudes and treatment towards refugees with disabilities on both banks of the Dniester/Nistru River, UN Human Rights recorded many instances of sympathy and solidarity, as well as reports of verbal offenses.

For example, one refugee in Tiraspol mentioned being insulted for speaking Ukrainian, while another noted that Ukrainians were blamed for local issues. However, **no reports of discrimination based solely on disability were received.**

A local organization from the left bank of the Dniester/Nistru River reported that individuals with serious medical conditions on the Left Bank face significant challenges in accessing legal status on the right bank of the Dniester/Nistru River. To register for Temporary Protection status, they must be transported to a right bank of the Dniester/Nistru River office for fingerprint scanning. However, ambulances from the Right Bank do not operate on the left bank of the Dniester/Nistru River, making it difficult to access the legal status, including the necessary treatments available only in Chisinau.

Part III. Conclusion and recommendations

The experience of arrival to Moldova and obtaining legal status varied between groups of refugees from Ukraine. Since the activation of the Government Regulation "On Providing Temporary Protection to Persons Displaced from Ukraine" on 1 March 2023, a growing number of refugees have been securing this more predictable legal status. When the Temporary Protection came into effect, displaced Ukrainians could still reside in the country under the emergency laws. This changed, however, on 15 May 2023, when the right to reside under the emergency laws was withdrawn. As a result, those already in the country had 90 days, until 13 August 2023, to regularize their legal status, be it through Temporary Protection, asylum, a statelessness application, or residence permit.

Third-country nationals, in particular citizens of the Russian Federation participating in the focus group discussion, who were not eligible for temporary protection, applied for refugee status instead. During the application process, some of them faced refusal to accept their application and insulting attitudes. These actions of civil servants were accompanied by comments on their ethnicity and nationality, which indicates discrimination on these grounds. In addition, most of them had had their asylum applications rejected. With regards to refugees of Roma ethnicity, UN Human Rights data found that they applied and obtained Temporary Protection at a slightly lower rate than other groups of refugees, but this was also motivated by the fact that many Roma refugees did not reportedly see a benefit in applying for this legal status. Overall, those who did apply for this legal status had a positive experience, also with the support of Roma community mediators.

Overall, except in the situation of third-country nationals UN Human Rights did not find any evidence of discrimination in access to legal status based on ethnicity or disability.

UN Human Rights recommends duty bearers and humanitarian actors:

- ⇒ **To collect, analyze and disseminate data** on the number of refugees with Temporary Protection, disaggregated by the disability ground.
- ⇒ **To ensure access to mobile teams** for all refugees with disabilities and those with limited mobility to facilitate their timely obtaining of Temporary Protection.
- ⇒ **To notify refugees from Ukraine promptly** about the extension of Temporary Protection status or any changes to its provisions, using various available information channels.
- ⇒ **To ensure respect for the principle of equality and non-discrimination** in every case of application for refugee status, irrespective of the applicant's country of citizenship, ethnicity or other characteristics.
- ⇒ **To raise awareness among civil servants and public administration employees** about the principles of equality and non-discrimination in the treatment of refugees from Ukraine.
- ⇒ To take measures **to promote equality and acceptance of diversity** among the host community.

Chapter II: Access to humanitarian assistance

Part I: Context overview

Since the beginning of the refugee crisis, the Republic of Moldova, with the support of the international community, has put in place a comprehensive support system for refugees from Ukraine, displaying great solidarity. According to data from UNHCR and the government, as of 31st January 2025, there are 127,786 refugees from Ukraine in Moldova¹⁴. Over the past two years and a half, humanitarian partners supported the government of Moldova to ensure refugees' access to legal status, protection, and rights; provide targeted assistance to refugees with vulnerabilities; and promote the socio-economic inclusion in the host communities.

Starting with March 2022, refugees from Ukraine in Moldova were enrolled in the cash assistance programme that enabled them to address their basic needs in the critical phase of the emergency. The programme continued throughout 2023 and 2024 and underwent a series of changes in 2024 as the refugee response entered its third year. The first change, which became applicable at the beginning of 2024, was related to the requirement of demonstrating legal status in Moldova¹⁵. The second change, which was communicated in April 2024 and applied from September 2024 relates to the fact that vulnerability-based targeting will determine the eligibility for the continuation of the cash assistance¹⁶.

Part II. Findings

UN Human Rights protection monitoring data found that **refugees' reported most urgent needs** were, in order of priority: **healthcare; financial assistance; food and non-food items**.

Humanitarian assistance represented a controversial issue in the relationship between refugees and host communities. According to UN agencies, INGOs and CSOs, tensions over humanitarian assistance have contributed to straining the relationship between these two groups. For instance, a refugee woman residing on the left bank of the Dniester/Nistru River reported facing judgmental attitudes and negative comments by locals in public transportation, for carrying a box with humanitarian aid. This allegedly made her hide the box inside a bag.

Several NGO representatives highlighted an issue concerning Moldovan citizens who had lived in Ukraine most of their lives and returned to Moldova due to the conflict. These individuals, who had acquired residency permits in Ukraine, found themselves in a vulnerable position upon fleeing to Moldova. They lacked a safety network in Moldova and were in as much need of assistance as refugees from Ukraine. Unlike Moldovan citizens residing in Moldova, they were not enrolled in any social protection mechanisms due to their previous residency in Ukraine.

The inequitable distribution of humanitarian assistance from international organizations and NGOs among different groups of refugees, as well as its significant limitation to those residing in accredited Refugee Accommodation Centers (RACs) was cited as another problem.

The next section will analyze more in detail access to humanitarian assistance for different groups of refugees from Ukraine.

¹⁴ UNHCR Operational Data Portal, Republic of Moldova. <https://data.unhcr.org/en/country/mda>.

¹⁵ [Frequently asked questions on UNHCR's cash assistance programme and the linkage to legal status - UNHCR Moldova](#).

¹⁶ [Important Changes in UNHCR Cash Assistance Programme - UNHCR Moldova](#).

Access to humanitarian assistance for Third-Country Nationals who arrived from Ukraine

Most of the interviewed Third-Country Nationals (TCNs) during the focus group discussion where, all the participants were Russian nationality, reported having received humanitarian aid including cash assistance, vouchers for food, and winter clothes. None of the participants felt discriminated against in the distribution of humanitarian aid. With regards to Russian citizens who participated in the FGD, it is important to note that initially they were enrolled in the cash assistance programme. However, as mentioned above, with the entry into force of the new regulations prescribing that receiving cash assistance was contingent upon having legal status (either Temporary Protection or refugee status), they were informed that they were no longer eligible to receive cash assistance because they did not have a legal status.

Access to humanitarian assistance for Roma refugees from Ukraine

During FGDs on **the right bank of the Dniester/Nistru River**, UN Human Rights received information from Roma refugees about derogatory comments and unequal treatment while receiving humanitarian aid. Roma women reported discriminatory remarks about their appearance and clothing, reflecting societal stereotypes. Some faced denial or difficulties in obtaining food vouchers and cash assistance, particularly in case of Roma women with disabilities. An NGO representative and UN Human Rights protection monitoring revealed similar issues of discrimination against Roma refugees from Ukraine in the north of Moldova. These data were confirmed by Roma community mediators, who witnessed multiple episodes of discrimination on ethnic grounds against Roma refugees. During a distribution of non-food items taking place in a municipality in the north of the country, refugees of non-Roma ethnicity were allegedly given entire aid packages, while Roma refugees only received some of the content of those packages and were requested to split the received items among them. The situation was worsened by a rude attitude and shouting by local civil servants.

UN Human Rights examination of access to humanitarian aid for Roma refugees residing on **the left bank of the Dniester/Nistru River** reveals a different situation. Firstly, humanitarian aid is less available on the left bank of the Dniester/Nistru River than on the Right Bank, due to the reduced presence of humanitarian organizations. Nonetheless, most refugees interviewed are enrolled in a cash assistance programme. In addition, refugees from the Roma community rely primarily on the Roma community mediators to receive humanitarian aid (clothing, food, medicine vouchers, etc.). Mediators inform refugees of the available assistance, identify who is most in need, and connect them with relevant NGOs. On the other hand, Roma mediators noted discontent among the local Roma community due to a perceived favoritism towards refugees in the provision of assistance.

Access to humanitarian assistance for refugees from Ukraine with disabilities

Refugees with disabilities on **the right bank of the Dniester/Nistru River** had varied experiences with humanitarian aid. While some reported that their specific needs, such as medical conditions, were addressed, they also faced challenges, including access to humanitarian aid. Refugees with disabilities who either did not bring their disability certificate to Moldova or had not previously applied for official recognition of their disability were particularly vulnerable. This group was, in some cases, excluded from receiving humanitarian assistance, including vouchers to local supermarket "Linella", as certain aid programs were directly linked to the possession of a disability certificate.¹⁷

¹⁷ This information was acknowledged during the "Public consultations on the report on discrimination faced by refugees from Ukraine in Moldova" held on 12th June on the Right Bank.

Additionally, there were reports of delays in cash assistance and inadequate support from hotlines services.¹⁸

On **the left bank of the Dniester/Nistru River**, there were no reported instances of discrimination against refugees with disabilities regarding humanitarian aid. However, like other refugees, many faced negative attitudes from the host community about receiving aid. A local NGO noted challenges in assisting persons with disabilities and older individuals, particularly due to aid providers requiring in-person collection and legal documents, such as powers of attorney. Although mobile groups were established to address these issues, significant difficulties persist.

Humanitarian actors' perspectives

In March 2024, UN Human Rights conducted a survey among international and local non-governmental organizations (INGOs and NGOs) to understand their patterns in providing humanitarian aid to refugees from Ukraine. The survey examined geographical areas of project implementation, factors influencing these choices, specific refugee groups supported, and the sectoral focus of the projects. Representatives from seven organizations participated — six INGOs and one NGO — who either were currently implementing projects for refugees from Ukraine or had done so previously.

The answers, which were anonymous, indicated:

- **Geographical targeting:** All seven respondents reported that their projects included the capital Chisinau. Five organizations implemented projects in a variety of regions but only on the right bank of the Dniester/Nistru River, and only two organizations reported implementing projects on the left bank of the Dniester/Nistru River.
- **Targeting of specific groups:** the most supported groups (for five organizations) included Roma refugees, refugees with disabilities, and older refugees. Four organizations worked with children; three with refugees living in rural areas; and two with ethnic or linguistic refugee minorities, women refugees victims of violence, and asylum-seekers. Only one organization worked with LGBTIQ+ and one with stateless persons.
- **Sectorial focus:** Social assistance and protection was the key area of focus (for five organizations), followed by education, food security, water, sanitation and hygiene, and health.

Part III. Conclusion and recommendations

When it comes to access to humanitarian assistance by different groups, UN Human Rights found that Roma refugees were primarily affected by discrimination. On the right bank of the Dniester/Nistru River, UN Human Rights identified instances of exclusion from assistance; discriminatory remarks by civil servants and humanitarian workers alike. This was not noted on the left bank of the Dniester/Nistru River, although access to humanitarian assistance there was more limited compared to the right bank of the Dniester/Nistru River, often depending on the efforts of the Roma community mediators.

UN Human Rights also found that humanitarian organizations mostly adopt vulnerability-based targeting, focusing on supporting the most vulnerable and marginalized groups, including Roma, refugees with disabilities and older refugees.

¹⁸This information was acknowledged during the “Public consultations on the report on discrimination faced by refugees from Ukraine in Moldova” held on 12th June on the Right Bank.

However, the issue of humanitarian assistance remains controversial, as members of the host community on both banks of the Dniester/Nistru River often felt their needs deprioritized compared to those of refugees.

UN Human Rights recommends duty bearers and humanitarian actors:

- ⇒ **To ensure that the vulnerability criteria** on the basis of which decisions are made on cash assistance for refugees from Ukraine **are open, clear and wide/inclusive**, ensuring accessibility for all refugees
- ⇒ **To ensure an individualized approach to each refugee during the needs assessment process**, including that the decision to refuse cash assistance is in writing, reasoned, understandable and provided in a timely manner. Provide refugees with clear information on the possible process and conditions for appealing the decision.
- ⇒ **To ensure equality in the distribution of humanitarian aid** regardless of ethnicity, age, health status and other characteristics of beneficiaries.
- ⇒ **To ensure that refugees have an effective and, safe complaint mechanism** if they believe to face discrimination in receiving humanitarian aid.
- ⇒ **To ensure that the most vulnerable refugees are included in social assistance programmes** according to their actual current needs.
- ⇒ **To take measures to increase humanitarian aid on the left bank of the Dniester/Nistru River**, including supplies for people with disabilities and people with limited mobility (glasses, canes, wheelchairs, etc.).
- ⇒ **To prioritize social cohesion through programming** that targets both refugees and host communities.
- ⇒ **To put in place mobile teams** and ensure their functioning for distribution of humanitarian aid for refugees with disabilities.
- ⇒ **To raise awareness of equality and non-discrimination among staff**, including staff of humanitarian organizations and points responsible for the distribution of humanitarian assistance.

Chapter III: The right to adequate housing

Part I: Context overview

Access to housing has represented a key priority for refugees from Ukraine arriving to Moldova.¹⁹ While approximately 3% of the total refugees arrived were accommodated in Refugee Accommodation Centers (RACs) during the first months of armed conflict, the majority sought accommodation in host communities or private accommodations. Outside of RACs, refugees faced challenges of affordability, particularly as the large refugee influx led to an increase in housing prices in the real estate market. In addition to these problems, refugees faced a decreased willingness among the host community to welcome them.²⁰

In early 2023, the Ministry of Labour and Social Protection (MoLSP), with support from humanitarian partners, began the RAC Consolidation process, aiming to gradually closing Refugee Accommodation Centers. To support refugee families during this transition, humanitarian partners introduced a Cash for Rent program in summer 2023. This program offered an average of 275 EUR per month per household for up to 6 months, with amounts varying based on property size and partner organization methodology.

Eligibility criteria included vulnerability and sustainability—the ability to independently cover rent after assistance ended. While the program's effectiveness relied on creating long-term income opportunities for refugees or connecting them with government social protection programs, the focus on sustainability as a criterion potentially disadvantaged certain individuals and groups, especially given that less than 10% of the refugees had formal employment at that time.

The government's decision of March 2023 to grant Temporary Protection status to refugees from Ukraine allocated a dedicated budget to ensure refugees' access to accommodation. In addition, special measures were introduced to support refugees with disabilities. The Government Regulation "On Providing Temporary Protection to Persons Displaced from Ukraine" affirms that '*beneficiaries of temporary protection, upon request, shall have access to accommodation within the Temporary Placement Centre for persons in difficulty, which should be accessible to people with specific needs.*' In addition, in recognition of the financial challenges faced by refugees, '*temporary protection beneficiaries are entitled to compensation for their energy bills according to Law No 241/2022 on the Energy Vulnerability Reduction Fund.*'²¹

Part II. Findings

According to desk review data, the rules for establishing RACs did not adequately address the needs of women with small children and older persons. Some RACs lacked private, lockable sanitary facilities for both genders, posing additional challenges. Moreover, the lack of accommodation options for single men led to cases of refusal of accommodation in RACs without alternative solutions, constituting gender discrimination.

UN Human Rights protection monitoring data show that interviewed refugees from Ukraine in Moldova live in different types of accommodation. At the time of the interviews, 47% were hosted for free by relatives or close friends; 37% rented an apartment or a house on their own; 8% were hosted for free by locals; 7% were hosted in RACs; 1% shared an apartment or house with other refugees.

¹⁹ Multi-sector needs assessment Moldova 2023. <https://reliefweb.int/report/moldova/moldova-multi-sector-needs-assessment-msna-protection-key-sectoral-findings-presentation-december-2023>.

²⁰ Hidden Hardship: 1 Year Living in Forced Displacement for Refugees from Ukraine | NRC.

²¹ The Government Regulation "On Providing Temporary Protection to Persons Displaced from Ukraine" .

UN Human Rights data analysis revealed differences in the housing situation between the right and the left bank of the Dniester/Nistru River. The percentage of refugees hosted for free by relatives, friends, or host community members was slightly higher on the left bank than on the right bank of the Dniester/Nistru River. The proportion of those renting apartments was similar on both banks of the Dniester/Nistru River. However, a significant difference was observed in the RACs accommodations, with eight times more refugees residing in RACs on the Right Bank compared to the left bank of the Dniester/Nistru River.

UN Human Rights individual interviews revealed that property owners often refused to rent to refugees from Ukraine, citing concerns over non-payment of rent, property damage, or theft. This refusal disproportionately affected families with children, people with disabilities, older persons, Roma, and third-country nationals. Additionally, the rising living costs due to the refugee crisis contributed to negative sentiments towards refugees, with some perceiving them as responsible for the increased expenses. This, in turn, led to instances of verbal abuse.

The following section examines in more detail access to adequate housing by specific groups of refugees residing on both banks of the Dniester/Nistru River.

The right to adequate housing for Third-Country Nationals who arrived from Ukraine

Most third-country nationals (TCN) arriving from Ukraine and interviewed by UN Human Rights were renting apartments (78%), with a smaller portion residing in RACs (22%). None were hosted by relatives or locals. This finding highlights the differing housing situation of TCNs who had been previously living in Ukraine compared to refugees of Ukrainian nationality.

UN Human Rights also documented the experiences of asylum seekers of Russian nationality, who were not eligible for Temporary Protection. Interviewees living in the Temporary Accommodation Center in Chisinau shared that, prior to their arrival, they had positive experiences in RACs, or centers managed by religious or charitable organizations. However, one woman reported being denied accommodation in a RAC, allegedly due to her nationality.

The right to adequate housing for Roma refugees from Ukraine

Available data indicate that two elements adversely affect the housing situation of Roma refugees: prevailing **widespread negative attitudes and discrimination during their search for housing**, both in private apartments and RACs, and the ethnic segregation they face in RACs, which reflects their broader societal marginalization. Different sources suggest that these issues are more prominent **on the Right Bank** compared to the left bank of the Dniester/Nistru River.

Roma refugees residing on the right bank of the Dniester/Nistru reported significant challenges in renting apartments, often facing repeated refusals from property owners solely due to their ethnicity. This issue was particularly pronounced in Chisinau compared to smaller cities. Roma community mediators provided examples, including a discriminatory advertisement for a house on sale, that stated *"We do not sell it to Gypsies"*. Additionally, many Roma refugees reported being **denied viewings after property owners saw them in person and recognized their ethnicity, despite initial agreements over the phone**. Two Roma reported they faced over twenty rejections in their attempts to rent an apartment. These discriminatory attitudes reflect deep-seated societal stereotypes, with comments such as *"People are afraid of Gypsies"* and *"Gypsies are dishonest"* cited by interviewees as indicative of prevailing biases.

Refugees of Roma ethnicity also faced segregation in RACs. The prevalence of a **segregationist approach** was highlighted by numerous Roma refugees and confirmed by the Office of the People's Advocate.

On **the right bank of the Dniester/Nistru River**, Roma community mediators played a crucial role in addressing housing challenges faced by Roma refugees. They intervened when discriminatory attitudes from RAC administrators hindered the acceptance of Roma refugees, advocating for their inclusion. Mediators noted that ethnicity often influenced refugee placement decisions. For example, in one city with two RACs, one exclusively housed Roma refugees. When this RAC closed, refugees in the other RAC initially resisted sharing space with Roma but eventually accepted them. Similarly, when some locals expressed distrust towards Roma refugees and hesitated to host them, mediators worked to counter this narrative, succeeding in some cases.

UN Human Rights data suggests a different housing situation for Roma refugees on **the left bank of Dniester/Nistru River**. All participants in focus group discussion reported residing in private apartments, likely due to significantly lower average costs of rent and utilities - reportedly twice as low as on the right bank of Dniester/Nistru River. Only one respondent reported discrimination while attempting to rent an apartment. Nonetheless, these generally positive accounts differ from the reports received by Roma community mediators on the Left Bank, who reported cases of property owners refusing to rent apartments to Roma refugees after detecting their accent or retracting agreements upon learning their ethnicity, even after receiving advance payments. The rental programmes provided by INGOs are essential but remain unavailable on the left bank of the Dniester/Nistru River.

The right to adequate housing for refugees from Ukraine with disabilities

Findings from UN Human Rights protection monitoring show that refugees with disabilities have been hosted for free by relatives or host families or have been residing in RACs at a slightly higher rate than refugees without disabilities. Only 24% of refugees with disabilities reported renting apartments, compared to 39% of refugees without disabilities.

On **the right bank of the Dniester/ Nistru River**, refugees with disabilities cited two primary challenges in their efforts to rent an apartment: **high rental prices**, especially in Chisinau (and compared to the Left Bank); and **refusal of some locals to rent apartments to refugees from Ukraine** due to stereotypes portraying refugees as thieves. However, there is no evidence to suggest that refugees with disabilities faced discrimination specifically based on their disability when seeking rental accommodations.

The **lack of accessibility in RACs** was another significant issue, as frequently highlighted by interviewees and confirmed by the Office of the People's Advocate. Most RACs lacked the necessary conditions to ensure physical accessibility, with only two RACs accommodating refugees with disabilities alongside those without disabilities. This limited accessibility ultimately led to a segregation of people with disabilities, who were confined to small number of RACs equipped with minimum facilities to address their special requirements.

On **the left bank of the Dniester/Nistru River**, none of the refugees with disabilities who participated in the FDG reported challenges related to their disability when searching for rental house. They also did not experience any negative treatment by property owners.

Part III. Conclusion and recommendations

The data collected and analyzed by UN Human Rights highlights widespread negative attitudes faced by refugees, regardless of any of their protected characteristics such as nationality, ethnic origin, language, religion, sex, age, disability, gender identity, sexual orientation, migration status. These attitudes are largely driven by the host community members attributing the rise in living costs to the refugee crisis, resulting in blame directed at refugees. These biases are reflected in many instances where property owners refused to rent apartments to refugees.

In this context, Roma refugees face intersectional discrimination not only due to their refugee status but also because of their ethnicity. While these discriminatory attitudes and practices were reportedly common on both banks of the Dniester/Nistru River, data indicate that they were more widespread on the Right Bank. Additionally, the refusal of accommodation in RACs and segregation further exacerbates the experiences of Roma refugees. Refugees with disabilities mostly faced issues related to accessibility of accommodations and segregation, as only a few RACs have adequate facilities to meet their needs.

UN Human Rights recommends duty bearers and humanitarian actors:

- ⇒ **To continue to undertake genuine consultations** with refugees on decisions affecting their living conditions; for instance, when refugees are relocated to other housing due to the closure of the RAC where they were housed.
- ⇒ **To take measures to eradicate the practice of segregation of Roma refugees**, persons with disabilities and people with low mobility when accommodating them in RACs by responding effectively and immediately to every case of discrimination, both by the administration and by non-Roma refugees living in RACs.
- ⇒ **To ensure that there are minimum physical and information accessibility requirements** for persons with disabilities and older people in RACs.
- ⇒ **To raise awareness among refugees from Ukraine about the Cash for Rent programme** and the criteria for participation.
- ⇒ To make efforts **to make the Cash for Rent programme available to refugees on the left bank of the Dniester/Nistru River.**
- ⇒ Together with the Equality Council and other responsible bodies **to take action to respond to public discriminatory advertisements in the sale and rental of housing**, to raise public awareness of non-discrimination on any grounds.

Chapter IV: The right to health

Part I: Context overview

The health system of Moldova faces several challenges, including insufficient funding, limited access to healthcare in rural areas and a workforce shortage, including of family doctors. A massive influx of refugees has put additional pressure on the health system. According to the 2023 Multi-Sectoral Needs Assessment (MSNA) conducted by REACH Initiative, healthcare services represented the top priority need for 43% of the interviewed refugee households.

Access to emergency and primary healthcare for refugees from Ukraine in Moldova was initially regulated by the Emergency Law, and later by the Temporary Protection legal status. The Decision No.1 of the Commission for Emergency Situations of 24 February 2022, along with Orders issued by the Ministry of Health, guaranteed access to primary and emergency healthcare for refugees from Ukraine. This included treatment of COVID-19 when hospitalization was required, addressing the immediate needs of the acute refugee crisis. Despite these measures, the Refugee Response Plan 2024 highlighted that in 2023 one fifth of refugee households reported difficulties accessing health services. The main barriers included long wait times, language barriers, lack of knowledge about available services, unavailable treatment and high costs. The introduction of the Temporary Protection legal status in March 2023 provided refugees from Ukraine with access to a broader range of healthcare services, including the right to register with a family doctor. As of 6 August 2024, 3,322 refugees from Ukraine were registered at a family doctor.²² This was implemented through Ministry of Health Order No. 142/54-A and Order No. 143, which granted displaced persons access to emergency medical care, primary healthcare, and medical examinations for public health purposes, including family doctor registration.

On 1 March 2024, the Ministry of Health amended Order No.143 to expand healthcare services for holders of Temporary Protection legal status. From that date, Temporary Protection holders become entitled to emergency pre-hospital medical assistance, primary healthcare, hospital medical assistance (in case of medical surgical emergencies), emergency dental care, oncologic medical services (including diagnosis and treatment), outpatient and inpatient dialysis services, mental and psychosocial service, and medical examinations for public health reasons. To access the full healthcare package, temporary protection holders must first register with a family doctor when seeking medical services for the first time at the medical institutions.

The Law on Asylum (№ 270/2008) regulates the right to health of asylum-seekers and beneficiaries of international protection in Moldova, ensuring they have access to healthcare under the same conditions as Moldovan nationals. According to this Law, asylum seekers are entitled to primary and emergency medical assistance. In particular, the medical assistance available to asylum seekers includes pre-hospital urgent medical assistance, primary health care, and emergency hospitalization healthcare.

Additionally, cooperation agreements between the National Health Insurance Company (CNAM) and three UN agencies continue to ensure the coverage of costs of different medical services for refugees from Ukraine, including women and children. The agreement with the United Nations Children Fund (UNICEF) covers the reimbursement of expenses for medical services provided to children from 0 to 18 years old. These services included emergency medical services at the pre-hospital stage; primary health care services; emergency hospital medical services. The agreement with the International

²¹ [More and more Ukrainian refugees are using free medical services in Chisinau](#)

Organization for Migration (IOM) ensures **coverage of dialysis services, available on both an outpatient and inpatient basis**. The agreement with the United Nations Population Fund (UNFPA) provides reimbursement of expenses for emergency hospital medical services for **women aged 18-55 years old**. However, these agreements do not include specialized medical services or medications for persons with special medical needs, such as refugees with disabilities.

Part II. Findings

UN Human Rights protection monitoring revealed that **46% of respondents** reported having serious medical conditions, including chronic and non-communicable diseases. This affected 74% of refugees on the Right Bank and 26% on the left bank of the Dniester/Nistru River. Among refugees with disabilities, 87% had serious medical conditions.

Of those with serious medical conditions, 21% reported difficulties accessing healthcare, a figure that rose to 37% among refugees with disabilities. Common barriers included **availability, accessibility, and quality of care**, with significant challenges in physical and informational accessibility, particularly for refugees with disabilities. There were also reports of healthcare staff refusing to provide medical services due to a lack of awareness about refugees' rights to access care.

According to UN Human Rights monitoring, **55% of the interviewed refugees from Ukraine were registered with a family doctor or therapist**. Registration rates were higher on the Right Bank (61%) compared to the left bank of the Dniester/Nistru River (35%). The main reasons for not registering included a desire to maintain a connection with a family doctor in Ukraine and not perceiving a need for local healthcare services.

The right to health for Third-Country Nationals who arrived from Ukraine

Out of the 13 third-country nationals interviewed through protection monitoring, including nationals of Russia, Azerbaijan, Tajikistan, and Turkey, only one reported suffering from serious medical conditions and did not report any challenges in accessing healthcare.

Information collected through the FGD with Russian citizens indicated that, while asylum seekers are not eligible for the full range of medical services granted to refugees with Temporary Protection legal status, they can nonetheless access some services through a specific public hospital. Most of the FGD participants mentioned this hospital, noting they underwent a free medical examination prior to their admission to the Temporary Accommodation Center (TAC) and later accessed other services including analyses and emergency care free of charge. Given these limitations on access to health services, purchasing health insurance is another option available to third-country nationals. However, significant barriers exist, as the legal framework requires a formal labor contract to obtain an insurance policy, limiting access for those without such employment arrangements.

The right to health for Roma refugees from Ukraine

UN Human Rights protection monitoring data show that **48% of the interviewed Roma refugees suffer from serious medical conditions** (86% on Right Bank and 14% on the left bank of the Dniester/Nistru River). Women represent three quarters of the Roma refugees suffering from serious medical conditions on the right bank and 100% on the left bank of the Dniester/Nistru River. Additionally, **33% of the Roma refugees with serious medical conditions also have a disability**. 50% of these individuals reported facing difficulties in accessing medical services. The most reported challenges in accessing healthcare included, in order of importance: fees

associated with medical care and medication; refusal by healthcare providers to deliver services; long wait times for appointments; transportation to medical facilities. Furthermore, 44% of the interviewed Roma refugees (92% of those interviewed on the Right Bank and 8% of those interviewed on the left bank of the Dniester/Nistru River) reported being registered with a family doctor. They were all registered at a family doctor on the right bank of the Dniester/Nistru River.

Negative attitudes from doctors and hospital staff, coupled with refusals to provide healthcare, were reported by many Roma refugees interviewed across multiple regions. *“The doctors refuse to see us, and we are treated rudely”*, said one Roma refugee.

During a FGD with Roma refugees residing **on the right bank of the Dniester/Nistru River**, it was found that Temporary Protection status was considered effective in accessing emergency and primary healthcare. On the other hand, Roma community mediators highlighted significant challenges, including mistrust of doctors and fears of mistreatment. Allegedly, Roma refugee women are afraid to gynecologist, because they been afraid of being sterilized without their consent. A woman with five children was allegedly told by a gynecologist: *“Stop giving birth, let us get you sterilized”*. In addition, mediators said that Roma refugees went to the hospital only as a measure of last resort, because they reportedly suffered discriminatory treatment. This includes having to queue for a long time, as opposed to non-Roma refugees, and they were told by hospital staff that they were loud, and they disturbed their work.

UN Human Rights also collected and analyzed data on access to healthcare for Roma refugees **on the left bank of the Dniester/Nistru River**. Overall, Roma refugees participating in the FGD reported that they were able to access healthcare, including consultations with doctors, in local hospitals. However, while some received services free of charge, others had to pay for medical services and medicines. Roma community mediators often played a key role in accompanying Roma refugees to Chisinau and liaising with medical institutions. Without this support, Roma refugees often faced refusals due to their ethnicity and encountered biased attitudes from medical workers.

The right to health for refugees from Ukraine with disabilities

UN Human Rights protection monitoring data show that **87% of interviewed refugees with disabilities suffer from serious medical conditions**, with 74% on the Right Bank and 26% on the left bank of the Dniester/Nistru River. On both banks, women make up over three-quarters of those with serious medical conditions. Approximately one in four of those with serious medical conditions reported facing barriers in accessing healthcare. These barriers included high costs for care, medication, and transportation; limited availability of medical services; refusal of care by providers; and long wait times for appointments. The nature of these barriers varied between the banks: on the left bank of the Dniester/Nistru River refugees experienced more frequently issues with the availability of services, doctors, and medicines, while on the right bank of the Dniester/Nistru River refugees faced more refusals to provide services and higher costs. Overall, 59% of refugees with disabilities were registered with a family doctor, with 88% on the Right Bank and 12% on the left bank of the Dniester/Nistru River.

UN Human Rights received **widespread reports of negative treatment** faced by refugees with disabilities at the hands doctors and other medical staff in hospitals **on both banks** of the Dniester/Nistru River.

Among the interviewed refugees with disabilities, **33% reported having a disability certificate issued in Ukraine.** While this certificate enabled 33% of them to access essential medicines or humanitarian aid from various organizations, 38% stated that it did not grant them access to any services.

Part III. Conclusion and recommendations

Since the onset of the refugee crisis, access to healthcare has been a critical need for refugees from Ukraine. UN Human Rights findings indicate that a significant portion of refugees suffers from serious medical conditions, with women and persons with disabilities being the most affected groups. Although legal status typically facilitates access to primary and emergency healthcare, barriers persist. These barriers primarily impact access to primary and secondary healthcare rather than emergency care and relate to availability, accessibility, affordability, and quality.

Discriminatory treatment has been reported, particularly affecting Roma refugees based on ethnicity, and, to a lesser extent, asylum seekers based on nationality. Roma community mediators have been crucial in improving access to healthcare for Roma refugees. Refugees with disabilities encounter additional challenges related to the lack of physical accessibility in healthcare facilities and insufficient medical guarantees for those holding disability certificates issued in Ukraine or another country. Ukrainian refugees with disabilities are concerned that in fact their disability is not adequately recognized as an additional vulnerability factor when accessing medical care. UN Human Rights found no consistent practice regarding the utility of these certificates, with equal numbers of refugees reporting benefits and limitations in accessing services.

UN Human Rights recommends duty bearers and humanitarian actors:

- ⇒ **To take steps to ensure the respect, protection and fulfilment of the right to health** for refugees from Ukraine in all its dimension, including availability, physical accessibility, and quality.
- ⇒ **To continue raising awareness among healthcare professionals** and staff of health institutions **on the provisions on the right to health** determined in the national legal framework applicable to refugees from Ukraine.
- ⇒ **To raise awareness among healthcare professionals** and staff of health institutions **on the principle of equality and non-discrimination** and its application in the provision of healthcare services.
- ⇒ To consider providing additional guarantees **to increase access to medical care** for refugees from Ukraine **holding a certificate of disability issued in Ukraine or a third country.**
- ⇒ **To ensure access for refugees with disabilities and those with limited mobility** to transport services for medical assistance, testing, and appointments at medical centers, laboratories, and other healthcare facilities.

Chapter V: The right to education

Part I: Context overview

Since the beginning of the refugee influx to Moldova, children have represented a considerable part of the refugees' population (33%). Their inclusion in the national education system has been a key focus for the State.²² Humanitarian partners collaborated with national authorities and specialized service providers to facilitate access to learning and skills development programs for all children, including those with disabilities and Roma children. However, during the first year of stay in Moldova, refugees children had a low attendance rates at formal educational institutions and "smart classes"-paces equipped for online learning, leading to a risk of increased isolation. Children with special needs faced particular challenges in accessing inclusive education.

In the school year 2022-2023, 1,155 refugee children from Ukraine attended schools in Moldova. Of these, 728 had "auditor status", meaning they attended classes but could not take exams, as they continued their studies online with Ukrainian schools. According to the Ministry of Education, in the school year 2023-2024, 2,078 refugee children from Ukraine were enrolled in Moldovan educational institutions, with half (1,084) located in Chisinau. Most Ukrainian children attend primary school (728), while 59 are enrolled high schools. As of 31 May 2024, a total of 49 Roma refugees' children were enrolled in the Moldovan schools. However, no data is available on school attendance disaggregated by the right and left banks of the Dniester/Nistru River.

At the national level, the government decision of 18 January 2023 on establishing a Temporary Protection mechanism granted access to education and formal and informal learning opportunities for pre-school and school-aged refugee boys and girls once they received Temporary Protection. The Ministry of Education and Research was responsible for ensuring that minors with Temporary Protection could access public educational institutions "subject to the possibilities of the educational system and under the same conditions established for minor citizens of the Republic of Moldova". This included early education²³ as well as technical and vocational education and higher education.²⁴ Between February and September 2023, refugee children without Temporary Protection could attend schools but were restricted to auditor status, leaving them in a state of uncertainty.

On 4 September 2023, the Ministry of Education and Research issued an order regarding the enrolment of Ukrainian children in Moldovan schools.²⁵ This instruction, however, did not apply to Third-Country Nationals children. It stipulated that all children of Ukrainian nationality, regardless of their Temporary Protection status, were eligible for enrollment in Moldovan schools without the need to present specific documents related to their legal status. The main positive outcome of this instruction was the elimination of the auditor status, allowing students who previously held this status to fully enroll in schools. At the same time, enrolment in Moldovan schools remains voluntary and not mandatory.

²² Inter-Agency Refugee Response Plan for 2023 (RRP 2023)

²³ The geographical breakdown of the Roma refugee children is the following: 16 in Glodeni; 2 in Ungheni; 7 in Anenii Noi; 5 in Hincesti; 16 in Stefan-Voda; 1 in UTA Gagauzia; 2 in Cahul.

²⁴ Government Regulation "On Providing Temporary Protection to Persons Displaced from Ukraine" specific objective 3.4 – 3.4.1.

²⁵ Order number 1109 dated 14.9.2023, Ministry of Education and Research (MER) https://mec.gov.md/sites/default/files/05092023131733_3719.pdf.

Part II. Findings

UN Human Rights protection monitoring data revealed that only **38% of interviewed refugees from Ukraine in Moldova had school-aged children, grandchildren or nephews enrolled in Moldovan school.** The majority of refugee children from Ukraine on both banks of the Dniester/Nistru River preferred to continue their online education using the Ukrainian curriculum. Among refugee children attending school in Moldova, enrolment rates varied significantly between the Right Bank (42%) and the Left Bank (68%) of the Dniester/Nistru River. This disparity can be partially explained by the availability of schools offering a Ukrainian-language curricula on the Left Bank and the compatibility of the 11-year school education system on the Left Bank with the Ukrainian system. In contrast, the Right Bank follows a 12-year education system. On the Right Bank, schools in Ukrainian-language are almost nonexistent. A limited number of schools offer classes in Russian with some subjects taught in Ukrainian, such as literature, culture, and history. As a result, most Ukrainian refugee children on the Right Bank opted to study in Russian-language classes as their only viable alternative, given their lack of Romanian language proficiency. Only a small number of children reported studying in Romanian, and all of these were located on the right bank of the Dniester/Nistru River.

The right to education for Roma refugee children

Based on the desk review findings, Roma children remain particularly vulnerable in terms of their right to education. Some of them, the exact number of children is not known, have had to face the double challenge of parental reluctance to send them to school and a lack of interest on the part of the state authorities, on the other. An example of discrimination against Roma children is the situation related to the distribution of technical equipment for online education. Educational institutions of the communities where a RAC is located, responsible for providing such equipment, ignored the requests of Roma families on discriminatory grounds.²⁶

According to UN Human Rights protection monitoring data, school enrolment rates among Roma refugee children are significantly lower than those of non-Roma refugee children. **Only a quarter of the interviewed Roma parents with school-age children had them enrolled in school.** Enrolment rates varied between the two banks of the Dniester/Nistru River, with 24% on the Right Bank and 40% on the Left Bank.²⁷

One central reason for the lower school attendance of Roma children, as noted by Roma community mediators, is illiteracy. Many of the Roma children not attending school in Moldova had been previously not enrolled in school in Ukraine. During the focus group discussions, emerged that children who were previously not enrolled in school were placed in grades corresponding to their age rather than their academic abilities, in the absence of remedial programs. This led to frustration, with some children refusing to return to school after a few visits.

Other reasons for not enrolling in local schools, mentioned by a few respondents, were the lack of specific documents required for the school enrolment; unavailability of places in school; the instability of their housing situation, due to the foreseen closure of the RAC where the family was living, and which was in proximity to the educational institution; and the lack of transportation to school. These challenges indicate the interdependence of human rights, where the realization of the right to education depends on adequate housing and other related rights.

²⁶ Report #2 on monitoring the observance of the rights of refugees from Ukraine in the context of the state of emergency for the period May - July 2022, Office of the People's Advocate.

²⁷ According to UNHCR and local Roma-led Organizations, the reported figure does not reflect the current situation, noting that OHCHR's figures, based on a different sample size, report higher enrolment rates than government statistics. This information was shared during the "Public consultations on the report on discrimination faced by refugees from Ukraine in Moldova" held on 12th June on the Right Bank.

Additionally, 67% of Roma interviewees cited a preference for continuing online education in Ukrainian schools as the primary reason for not enrolling their children in local schools.

Negative attitudes towards Roma refugee children also contributed to non-attendance. *“My son was treated poorly by the teacher at school, because he is a refugee and because he is a Roma”* said mother of a Roma child. This example underscores the intersectional discrimination faced by Roma refugee children.

During the FGD, none of the participants had children enrolled in educational institutions in Moldova. Children were either studying online in Ukrainian schools or not studying at all. Some parents explained that their children had previously attempted to attend local schools but dropped out due to conflicts with local children and bullying. Focus group discussion participants living in some RAC reported that their children had access to alternatives within the RAC, specifically created for Roma children. However, these specialized classes were perceived by both parents and mediators as a form of segregation.

On the left bank of the Dniester/Nistru River, UN Human Rights data revealed **a more positive schooling experience for Roma refugee children**. Most participants to the FGD reported that their children were enrolled in school and had positive experiences, with no widespread negative attitude from local children and supportive attitudes from the school administration. This was confirmed by Roma community mediators, noting only occasional conflicts, which they addressed promptly. Mediators overall played a key role in facilitating school enrollment for Roma refugees, including assisting with the necessary paperwork.

Part III. Conclusion and recommendations

The experiences of refugee children in Moldova are diverse, but Roma children face significant discrimination that hinders their full enjoyment of their right to education. Among the interviewees of UN Human Rights protection monitoring, over one-third reported that their children were enrolled in schools in Moldova; however, this percentage decreased to one-fourth for Roma refugee children. In addition to lower enrollment rate, Roma refugee children faced mistreatment and bullying by local children, particularly on the right bank of the Dniester/Nistru River. They also faced segregation in both formal and informal educational settings.

UN Human Rights recommends duty bearers and humanitarian actors:

- ⇒ **To disaggregate data of school attendance** of refugee children by prohibited grounds of discrimination including nationality, ethnic origin, language, sex, age, disability, migration status, as encouraged by the UN Committee on Economic, Social and Cultural Rights.
- ⇒ **To promote the integration of Roma refugee children** in school settings by countering negative stereotypes that affect refugee children, particularly those of Roma ethnicity, and by engaging with school administration, teachers, students, and parents.
- ⇒ **To avoid and end segregation** in both formal and informal education settings.
- ⇒ **To raise awareness with Roma children and their parents** on the importance of primary education and its compulsory nature.
- ⇒ **To identify Roma children** who were out-of-school children in Ukraine and support them with a catch-up programme.

- ⇒ **To facilitate access to education** by ensuring refugee children enjoy all necessary human rights, including the right to adequate housing and safe transportation to school.
- ⇒ **To ensure that all refugee children from Ukraine are covered by school education**, whether through enrollment in local schools or online studies in Ukrainian schools. Take measures to restore the right to education for children who are not currently enrolled in any school.

Chapter VI: The right to work

Part I: Context overview

Since their arrival to Moldova, refugees from Ukraine have been facing multiple challenges in finding employment and securing a stable income for themselves and their families. UN Human Rights desk review identified several barriers, including language barriers, limited job opportunities (particularly in rural areas), low wages, discrimination based on age and disability, mismatch between job offers and qualifications, and lastly, caregiving responsibilities. These challenges are particularly pronounced for single-parent refugee families from Ukraine, predominantly led by women, who need to balance childcare responsibilities with work schedules. Indeed, 83% of refugees from Ukraine in Moldova are women with children, and around 4% of refugee's households include at least one person with a disability.²⁸

As a result of these challenges, as of 23 May 2024, only 1,411 refugees from Ukraine are officially employed in Moldova. This includes 971 women and 440 men.²⁹ It is estimated, however, that many more are working informally. Consequently, the majority of refugees in Moldova rely on unsustainable income sources. For 68% of refugee households, the most common coping mechanism is using savings to meet daily necessities.³⁰

The **right to work** is a fundamental human right recognized in international human rights law and is critical for safeguarding other human rights. It is defined as the right of everyone to the opportunity to gain livelihood through work freely chosen or accepted.

At the national level, the right to work for refugees was guaranteed by the Decision #4 of the Commission for Emergency Situations on 1 March 2022, granting them the right to work on the territory of the Republic of Moldova without obtaining a temporary residence permit for work purposes. The government's decision in March 2023 to grant Temporary Protection status to refugees from Ukraine further solidified this right. The Decision states: *"Beneficiaries of protection shall have the right to work on the territory of the Republic of Moldova without obtaining the right of temporary residence for the purpose of work. Employment of beneficiaries of temporary protection shall be based on the individual employment contract"*. Furthermore, beneficiaries of temporary protection can register as job seekers with the National Employment Agency, facilitating their integration into the local labor market.

Part II. Findings

UN Human Rights protection monitoring data revealed that **majority of interviewed refugees (79%) were unemployed**. Among the employed, 11% were informally employed in Moldova, 6% had a formal contract, and 4% worked remotely. These employment patterns were similar on both banks of the Dniester/Nistru River. Refugees worked in various sectors, including seasonal agricultural work, sales, construction, and beauty industry. Of those unemployed, only 15% reported they were actively looking for a job, while 20% presented no interest in finding one. The main reasons for unemployment were childcare or caregiving responsibilities, with 8 % citing health issues as the main barrier. Among these, 60% were persons with disabilities.

²⁸ [Gender Brief: Livelihoods and access to work of refugees from Ukraine in neighbouring countries.](#)

²⁹ [National Employment Agency, 23 May 2024.](#)

³⁰ [Regional Refugee Response for the Ukraine Situation January – December 2024.](#)

³¹ [Decision # 21 on granting Temporary Protection.](#)

Key barriers for refugees to securing employment included **skills mismatches, low wages, lack of employer knowledge about hiring refugees with Temporary Protection, and limited proficiency in the Romanian language.**

On the right bank of the Dniester/Nistru River, employers frequently hesitated to hire refugees due to the perceived short-term nature of their legal status, fearing to invest in employees who might eventually return to Ukraine. On the left bank, refugees faced challenges related to mandatory registration documents and specific hiring criteria tied to local registration requirements.

The following section examines in more detail access to the right to work by specific groups of refugees residing on both banks of Dniester/Nistru River.

The right to work for Third-Country Nationals who arrived from Ukraine

UN Human Rights data protection monitoring revealed that only 33% of interviewed Third Country Nationals (TCNs) were employed, either formally or informally.

During public consultations of the draft report, participants pointed out challenges faced by asylum seekers. They emphasized that employers hesitate to hire them because their documents were valid for only one month, limiting their ability to open bank accounts or purchasing insurance. This constrains significantly restricted their access to essential rights and services.³²

With regards to asylum seekers of Russian nationality, none were formally employed at the time of the FGD, and only one was working informally. Nonetheless, over half of the participants had previously worked in Moldova for some time, mostly in a warehouse or companies, but left due to reasons such as insufficient income. Although they did not report direct discrimination work, some mentioned discomfort caused by locals' comments linking them to the war in Ukraine, and the attribution of blame for its start. Language barriers were also mentioned as an obstacle. Finally, while the legislation does not prohibit asylum seekers from accessing vocational trainings, in practice, admission to educational institutions remains challenging, often due to a lack of information provided by the educational institutions administration.

The right to work for Roma refugees from Ukraine

In addition to facing the challenges common to all refugees in securing stable employment in Moldova, **Roma refugees encounter additional obstacles specific to their ethnicity.** Data collected by UN Human Rights reveals that only 11% of refugees of Roma ethnicity were employed in Moldova, while 89% unemployed. Employment rates **varied significantly between the two banks of the Dniester/Nistru River: 25% on the Left Bank compared to 5% on the Bank.** Among those employed, only 33% had formal contracts, while 67% worked informally. Additionally, only 16% unemployed Roma refugees were actively looking for a job, citing barriers such as discrimination, language barriers and caregiving responsibilities.

UN Human Rights received credible information about the challenges faced by Roma refugees in accessing the right to work. Refugees of Roma ethnicity residing on the right bank of the Dniester/Nistru River reported encountering significant barriers in accessing employment and lack of access to vocational trainings, including discrimination. During the FGD, only two Roma refugees were employed at the time - one formally and one informally - and both held low-skilled jobs with wages

³² This information was shared during the "Public consultations on the report on discrimination faced by refugees from Ukraine in Moldova" held on 12th June on the Right Bank.

insufficient to ensure a decent standard of living. Most participants reported that they were actively searching for a job but were unsuccessful, attributing this to ethnic discrimination.

Instances of widespread negative treatment and discrimination during job searches were reported by many respondents in protection monitoring interviews. Some spent over six months searching for work but faced rejection once employers became aware of their ethnicity. In some cases, **job offers were canceled after employers met Roma refugees in person.** A Roma community mediator explained: *“Employers do not want to hire our [Moldovan] Roma, and Roma from Ukraine are even less able to get a job”*. This points to intersectional discrimination, based on refugee status and ethnicity ground.

A Roma mediator highlighted the fact that the Local Employment Agency in Ocnita had denied Roma refugees registration as unemployed, alleging that they were not genuinely seeking work but were instead attempting to receive social benefits. The justification provided was: *“If you are Roma, you do not wish to work; you only seek assistance”*.

Despite these challenges, **Roma community mediators** working on both banks of the Dniester/Nistru River **played a key role** in facilitating access to employment. On the Left Bank, mediators frequently directed Roma refugees toward temporary or seasonal work. Additionally, they sought to address factors contributing to low economic activity among Roma refugees - such as limited qualifications - by actively engaging with humanitarian partners and employment institutions to increase access to vocational training.

The right to work for refugees with disabilities from Ukraine

UN Human Rights data found that **4% of the interviewed refugees with disabilities were employed in Moldova**, with 1% working formally, and 3% informally. Those who were not employed cited health difficulties, age, and language barriers as the primary reasons.

On the right bank of the Dniester/Nistru River, none of the participants in the focus group discussion were employed, primarily due to health issues or their disability. Some participants had previously worked but had to leave due to worsening health issues.

On the left bank of the Dniester/Nistru River, the main challenge reported by refugees with disabilities was securing the long-term registration required for employment. However, this challenge was not related to their disability status. Only one participant of the FGD had previously worked a physically demanding, low-paid job, which eventually had to leave due to health issues. She was able to secure another job only after having obtained the long-term residence permit.

Part III. Conclusion and recommendations

UN Human Rights data found that a small percentage of refugees from Ukraine were employed in Moldova on both banks of the Dniester/Nistru River, with the number of those working informally being twice as high as those with formal employment. UN Human Rights identified multiple challenges preventing refugees' population from accessing employment, including skills mismatches; language barriers; discrimination based on refugee or asylum-seeker status; health issues or disability status; and caregiving responsibilities.

These challenges disproportionately affect certain groups. For instance, caregiving responsibilities, including childcare or caring for a person with a disability, primarily fall on women. Additionally, refugees of Roma ethnicity face discrimination based on their ethnicity often compounded by their refugee status. UN Human Rights found that Roma refugees experience the highest levels of discrimination, both in seeking employment and in the workplace.

UN Human Rights recommends to duty bearers and humanitarian actors:

- ⇒ **To respect, protect and fulfill the accessibility of the right to work**, by addressing the specific needs of refugees with disabilities and single-headed families, and enhancing all forms of employment support services connecting the needs of refugees and employers.
- ⇒ **To promote the economic integration of Roma refugees**, through countering discrimination, strengthening the network of Roma community mediators, and providing vocational training programs.
- ⇒ **To encourage employers to organize internship days** for job seekers, offering them experiences in a new role or profession.
- ⇒ **To support refugees in acquiring the Romanian language** by providing access to free language courses.
- ⇒ **To raise awareness among employers** on regulations in hiring holders of temporary protection status.
- ⇒ **To provide asylum-seekers with the legal opportunity to be employed** while they await a decision on their asylum application and the entry into force of the final decision on their application.