

Temporary Protection Update

Republic of Moldova

No. 3 | 7 August 2023

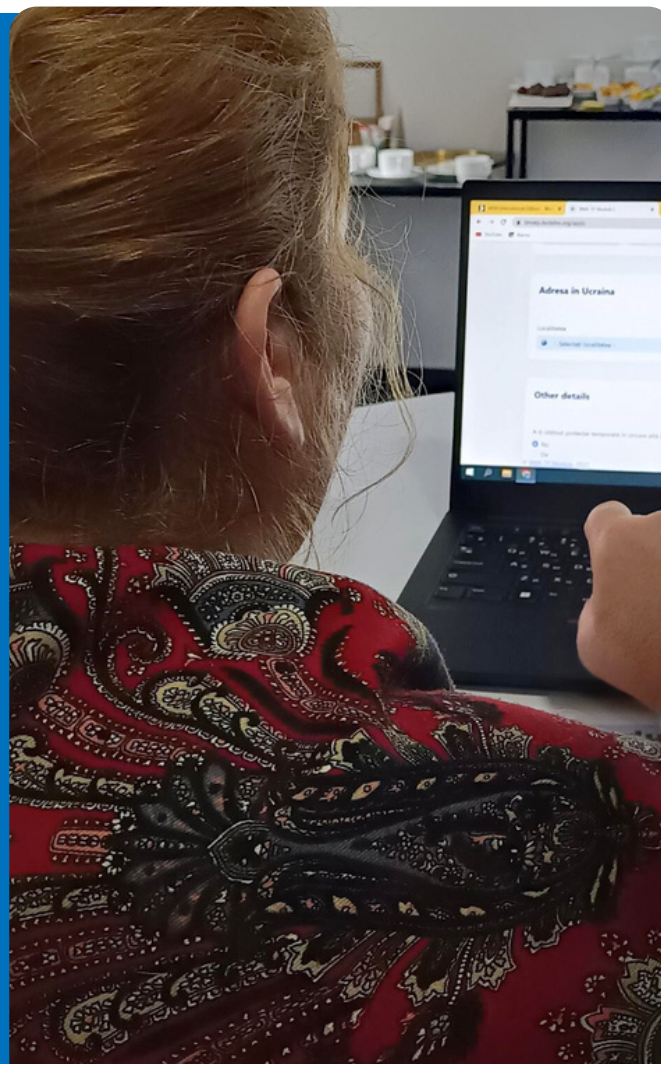
On 18 January 2023, the Government of the Republic of Moldova approved the granting of temporary protection (TP) for refugees from Ukraine (as well as certain third country nationals), effective 1 March 2023. This important milestone provided a more secure legal status to Ukrainian refugees– a key step towards greater refugee inclusion in Moldova. TP, which will last for one year with the possibility of renewal for an additional year, provides access to a number of rights and services including access to employment, temporary accommodation, emergency and primary medical assistance, public education for children, and social assistance for families with children and unaccompanied children.

As of 7 August, 10,747 individuals were granted temporary protection.

In addition, 6,990 citizens of Ukraine have been granted resident permits; and 145 have been granted asylum or humanitarian protection.

UNHCR supported the Government's preparations for TP through technical input into draft legislation and action plans, as well as concrete steps towards implementation:

- Renovating/furnishing the General Inspectorate for Migration (IGM)'s main registration centre and the temporary accommodation centre in Chisinau, in addition to two regional offices.
- Reinforcing registration capacity with training of 96 IGM staff and supporting capacity of 25 additional staff.
- Procuring registration equipment like vehicles, computers, biometric scanners, and card printers.
- Building a custom data system that connects with other government systems.
- Collaborating on a joint information campaign for refugees, service providers and local authorities.



Registration

As of 15 May, according to a decision of the Commission on Exceptional Situations (CES), Ukrainian refugees in Moldova have 90 days to regularize their stay in the country (by 13 August), be it through temporary protection, asylum, stateless status, or a residence permit. While the Government has said it will not deport individuals who fail to do so, those without legal status will not be eligible for a variety of government services and they may be fined. Importantly those without legal status will remain eligible to apply for TP after 13 August.

On 5 June, the Commission on Migration and Asylum, chaired by the Ministry of Internal Affairs (MIA), convened a meeting with other ministries and partners to review the status of TP implementation. Various implementation challenges were raised (*see implementation challenges below*) and working groups established to discuss them. MIA convened similar meetings at the territorial level in Cahul and Balti.

TP registration is available at two locations in Chisinau, Cahul, Comrat, and Balti; as well as at six IGM offices along the administrative line with the Transnistrian region.

UNHCR funded five mobile units for IGM and mobile registration has been available since late April for those with serious mobility issues. Concerns have been raised, though, about the accessibility of these units. Law Centre of Advocates staff are present at IGM offices providing basic legal counselling and information on TP rights. UNHCR is working with MLSP (Guardianship Authority) and child protection partners to support on a case-by-case basis the registration of unaccompanied and separated children and to provide information to caregivers.

UNHCR has conducted joint site visits with IGM to its three regional offices to review TP implementation and to identify issues that need to be addressed. These have included technical problems with the pre-enrolment form, questions around the mobile units, and support needs for refugees to complete on-line pre-enrolment. UNHCR has also organized TP Enrolment Fairs in Chisinau and Balti with partners to assist refugees with the registration process; 72 refugees joined the exercise. Additional TP Enrolment Fairs are being planned for other locations.

Information campaign & monitoring

IGM and UNHCR launched a TP information campaign on 1 March. Jointly developed [digital cards](#) and [videos](#) are online on key platforms and have reached 1.6M views. Over 39,000 printed materials have been distributed at the national level. The information is available in Russian, Ukrainian, Romanian, Romani and English.

Communications efforts are being made to target older persons, unaccompanied and separated children caregivers, Roma refugees, youth, and persons with disabilities. In addition, IGM and other Ministries are developing communication pieces on rights associated with TP, including education, employment, and health care.

UNHCR and IGM developed written [FAQs](#) in Romanian, Ukrainian, Russian and English which are updated to address new questions and shared with service providers to ensure they have the most up-to-date information. Info sessions for frontline workers have reached over 961 individuals from 90 organizations so far, including Green Line operators, Roma Mediators, local actors, Guardianship authorities, and RAC managers, among others.

Together with partners, including the National Congress for Ukrainians in Moldova, UNHCR developed a tool to monitor intentions and experiences with TP registration, which was deployed in late April and remains ongoing. UNHCR gathers information through regular field activities and focus group discussions as well as via its Regional Protection and Border Monitoring Tool. Finally, Laolalta monitors feedback through its rumour tracking system.

AAP partners have communicated in 22 social media outlets the latest changes, and the need to secure a legal status in the country; this included a live session on Moldova for Peace Telegram and [TikTok videos](#) from the Moldovan National Youth Council. In addition, partners continue to respond to individual inquiries from refugees in different channels.

TP & health care

On 1 March, the Government annulled a number of CES decisions related to healthcare for Ukrainian refugees under the emergency laws on the grounds that healthcare was now available to them as TP beneficiaries. The Ministry of Health also issued a list of medical services for which TP holders are eligible, including pre-hospital emergency care, primary healthcare, emergency hospital care, outpatient dialysis, and emergency dental care. As a result of these changes, primary health care is now only available to Ukrainians granted TP. Reports have been received of refugees being denied services because they lack TP.

The Ministry of Health convened a working group on access to healthcare and TP on 11 May. During the meeting, the state health insurance company (CNAM) indicated that agreements between UN agencies (UNICEF, UNFPA, IOM) and CNAM to reimburse costs of health services for refugees from Ukraine would be limited to TP beneficiaries, despite the willingness of the UN agencies to cover other Ukrainians as well.

On July 28, once again CES published a decision to derogate previous orders for public health reasons. CNAM shall cover emergency and primary health care (in accordance with the preestablished list of services) to persons displaced from Ukraine who prove a willingness to obtain TP. While the decision expands access to health care services to refugees, the operationalization is unclear and further guidance is required.

TP & cash assistance

UNHCR continues to provide cash assistance to Ukrainian refugees regardless of legal status as part of its humanitarian programming, provided they meet eligibility requirements. Refugees are encouraged, however, to apply for TP or another form of legal status in Moldova to ensure access to government services. UNHCR expects to increase targeting of cash assistance in the coming months to focus on the most vulnerable among the refugee population.

TP & employment

On 10 May, the CES repealed various decisions related to the employment of Ukrainian refugees under the emergency laws, including the right to work without obtaining a temporary residence permit. As a result, to lawfully work in Moldova, Ukrainians must either be a beneficiary of TP or have another legal status that affords them the right to work. MIA has stated that this change in law will not be retroactive and that employment contracts in place as of 15 May will remain valid while refugees regularize their legal status. As of mid-July, some 1,125 Ukrainian refugees were formally employed, with contracts registered with the National Employment Agency.

TP & education

As of June 2023, only 1,815 children were officially enrolled in Moldovan schools, including 700 children who were enrolled at the pre-school level. This represents approximately a 4% enrolment rate in Moldovan schools, with the remainder largely believed to be studying on-line in Ukraine's education system. The Ministry of Education and Research (MER) recently stated that students needed to have TP status or have arrived in Moldova within the past 90 days to enrol in Moldova schools and that those without TP status would be considered on a case-by-case basis. MER also stated that they recognize children's right to education and are working on guidance for children without TP. UNHCR is aware of schools seeking guidance on how to enrol Ukrainian children with and without TP status. MER reports that a government decision on the enrolment of Ukrainian children in Moldovan schools is reportedly forthcoming, however, the details for enrolment remain unclear.

Implementation challenges



Uncertainty and anxiety

Refugees must apply for TP or another form of legal status by 13 August or risk being in the country unlawfully without access to services. Refugees are anxious about this change and what it means for them.



Further and more detailed outreach is needed

To inform authorities, partners, refugees and other stakeholders on how to apply for TP, rights of the beneficiaries and the implications of falling out of status.



Proof of residence

Continues to be a major challenge in registering for TP. UNHCR and its partners observe with concern the monetary exchanges occurring to obtain proof of residence, and the increase in the rent for those refugees requesting the document.



Limit on travel abroad

Under the Government's TP decision, beneficiaries lose TP status if they are outside of Moldova for over 45 cumulative days. As a result, some refugees have hesitated to register. The Government has clarified that individuals will be able to re-apply for TP if it is lost due to the 45-day time limit, but this information is not yet well known.



Transnistrian context

Uncertainties about how to prove residency here have proven particularly challenging, and the situation of unaccompanied children is unclear. Also, many Ukrainians in this region already have a legal status from local authorities which reduces the incentive to register with national authorities unless they seek services on the right bank of the Dniestr. Transportation to IGM is also needed for those with serious mobility issues. UNHCR has been providing information to NGOs in the region in the absence of an official campaign and partners have been organizing transportation for those who need this support.

Key messages for next steps

- Clarify what will happen to refugees who do not regularize their status before 13 August, in particular whether they will have to pay a fine for unlawful presence if they apply for TP and if they will be re-admitted to Moldova should they travel to Ukraine.
- Review proof of residence requirements to ensure TP is accessible to all who are otherwise eligible and increase outreach to property owners and landlords to support refugees in proving residence in Moldova.
- Ensure access to education for all refugee children, regardless of legal status.
- Bolster the information campaign with guidance on registration requirements, and access to rights associated with TP (including public servants).
- Facilitate access to registration for refugees who face particular challenges, such as refugees with disabilities, older persons, Roma, or those in the Transnistrian region.