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IRC Poland

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Introduction

At the end of 2024, over 998,000 refugees from Ukraine were residing in Poland¹.

In the second half of 2024, Poland adopted a new migration strategy titled "Regain Control. Ensure Security. A Comprehensive and Responsible Migration Strategy for Poland 2025-2030." The strategy emphasizes stricter border controls and migration management. A key event accompanying the launch of the strategy was a public hearing held on 25 November 2024, initiated by both civil society and governmental actors. The hearing responded to calls from non-governmental organizations and experts to increase civil society involvement in migration policymaking.

At the same time, significant changes were introduced regarding the access of Ukrainian refugee children to the Polish education system. As of 1 September 2024, legal amendments made preschool preparation, compulsory schooling, and upper secondary education mandatory for children from Ukraine. The eligibility for social benefits, such as the 800+ child benefit and the "Dobry Start" school allowance, was linked to compliance with the education requirement in Polish schools.

Moreover, work commenced on a new law governing the employment of foreigners, which was adopted in early 2025. The legislation streamlines employment procedures by removing the labor market test and fully digitizing administrative processes. Simultaneously, it introduces stricter sanctions for irregular employment practices2. While this report focuses on the implications for Ukrainian refugees, the applicable laws and strategies extend to other migrant populations as well.

These developments reflect Poland's changing policy context. While aimed at organizing migration and integration processes, they may generate new challenges. They are likely to impact key risks identified through Protection Monitoring, particularly in access to services, employment, and social protection. These dynamics are analyzed in detail in the following chapters of the report.

In this cycle, IRC's Protection Monitoring Team identified three key risks:

- Risk of discrimination and stigmatization
- Risk of restricted access to basic needs and services
- Risk of labour exploitation



Photo: A. Liminowicz

Methodology

The IRC conducts Protection Monitoring to regularly collect and analyze data about the protection situation of refugees from Ukraine in Poland and monitor changes over time.

Protection Monitoring aims at identifying and analyzing risks and trends relevant to the protection and assistance of affected populations to allow informed decision-making and the design of evidence-based humanitarian responses.

In the second half of the year the IRC Protection Monitoring Team conducted 661 surveys with refugees over the age of 18. Additionally, as part of the qualitative research component, 14 expert interviews (KIIs) were conducted. The monitoring was carried out in three cities: Warsaw, Katowice, and Gdynia. However, the majority of the respondents were refugees in Warsaw.

1 IRC Protection Analysis Framework

Protection Monitoring is integrated with Protection Analysis Framework (PAF). PAF is an analytical process undertaken to identify and understand protection risks with the aim of informing strategies and responses. The analytical conclusions are to guide the development of strategies for reducing protection risk.

2 Sampling

Convenience, non-probabilistic sampling was used. The data for Q3 (n=312) and Q4 (n=349) come from two distinct samples of refugees, each of which is not representative of the broader refugee population. As such, comparisons between the two samples should be interpreted with caution. The data collected for each quarter provides valuable insights into the specific groups surveyed, but the non-representative nature of the samples limits the ability to generalize beyond the surveyed population.

3 Methods

Mixed approach (qualitative methods together with quantitative ones).

- Individual Household Survey
- Semi-structured interviews (KIIs)
- Participant observation
- Desk Review
- Thematic and statistical analysis including qualitative coding

Interviews are conducted in various locations, including local NGOs' locations, community centers, collective accommodation sites, information, and assistance points, transit locations and reception/registration centers.

This protection monitoring analysis is published quarterly and is mainly based on the above-mentioned information, complemented by secondary sources.

4 Limitations

Participants are identified in the selected locations and asked for their consent to be interviewed using a harmonized questionnaire. The results presented in this report should be interpreted according to the limitations of the methodology and the context.

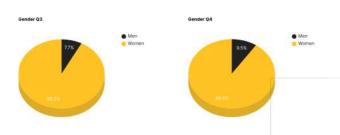
- Convenience, non-probabilistic sampling was used.
 Therefore, these results should not be generalized for the overall population and represent only the situation of the surveyed population described in detail in the "Demographics" section of this report.
- All participants are Ukrainian citizens. No thirdcountry nationals (TCNs) were surveyed in this round of Protection Monitoring.
- Some of the participants do not live in the location where the interview was conducted. Therefore, the results may not be fully accurate for place of residence.
- A methodological limitation is the underrepresentation of male refugees in our sample. This imbalance may restrict the accuracy of our findings.

Demographics

Gender and age

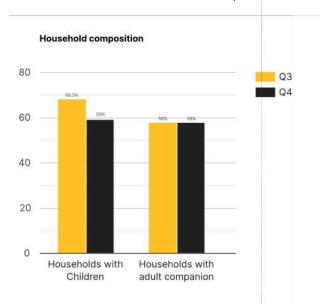
As in previous quarters, the vast majority of respondents were refugee women from Ukraine. In Q3, they accounted for 92.3% of all Protection Monitoring participants; in Q4, 90.5%. Most respondents were aged 35-49. Older respondents, aged 60 and above, made up 23% of the sample in Q3 and 28% in Q4.

In both quarters, a comparable number of respondents reported higher education, averaging around 64% of participants.



Household composition

Across both quarters, the largest household size was six members, though the average household size remained around two individuals. In Q3, over 58% of households included at least one adult companion, while 68.3% included children. In Q4, these figures remained comparable, with children present in 59% of households and at least one adult companion in 58%.



Region of origin and time of arrival

Respondents primarily originated from eastern regions of Ukraine, including Dnipropetrovsk, Kherson, Donetsk, and Zaporizhia. However, individuals from Kyiv oblast remained the biggest single group, accounting for around 19% of respondents in Q3 and 15% in Q4.

The majority of respondents in both Q3 and Q4 arrived in Poland in 2022 (between 79% and 81%). with most arriving between February and March. Respondents who arrived in 2023 made up no more than 11% of the sample, while newly arrived individuals represented 8% to 9% of participants in Q3 and Q4.

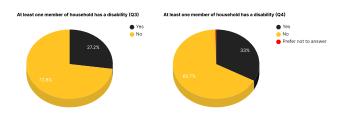


Photo: F. Pistilli

Demographics

Children aged 1 to 6 years constituted the largest age group (around 40%), followed by children aged 7 to 10 years (32% in Q3 and 35% in Q4). Most children were the sons or daughters of the household members. Among adult household members, the majority were respondents' partners. The second most common were adult children, followed by parents, who made up approximately 15% of household members.

Regarding individuals with disabilities, at least one household member reported some form of disability in 27% to 33% of cases across both quarters. Additionally, chronic illnesses were reported in around 50% of households in both Q3 and Q4. In Q3, 41.2% of respondents held a disability certificate issued exclusively in Ukraine; this figure increased to 47.4% in Q4.



Approximately 28% of respondents in both guarters reported some form of difficulty related to walking, hearing, seeing, memory, communication, or selfcare.

Access to the territory

In both Q3 and Q4, around 10% of respondents reported facing challenges while crossing the Ukrainian border. The most commonly reported issue was related to martial law, which was cited more frequently—or exclusively, as in Q3 — by women.

(I)

The last time I was in Ukraine. I was alone at the baggage check on my way back to Poland, even though I was traveling by train with my children. They took everything from me and everything from the children. They made me take off my clothes down to my underwear, probably because we were from Pokrovsk and were the only ones with a Donetsk residence permit"

(Female, 28, Warsaw)

The most severe challenges were reported by individuals who had to cross through Russian territory. This group consisted of 38 respondents.



I was kidnapped with my children in a black van, and we were locked in a bus in the forest. I was separated from the children. We were rescued by volunteers from the forest. We climbed out through the windows of the van.

(Female, 36, Warsaw)

OD

We crossed through Russia from the occupied territory; my husband was stripped and had his tattoos examined while a gun was pressed to his head. This was a psychological trauma for all of us, and they could take anything they liked from our car. They could open fire at any moment, and we had to wrap ourselves in white cloths and wave them.

(Female, 38, Gdynia)

Some respondents who did not cross the Ukrainian border reported traveling through other countries, most commonly Russia, Lithuania, Latvia, or Belarus. This group accounted for approximately 6% of respondents in Q3 and 7.5% in Q4 2024.

Situation of Ukrainian refugees in Poland

Access to documentation and legal identity

The number of individuals reporting missing documentation, as in previous PM analyses, was around 16% of respondents in Q3, with 15% specifically citing a lack of international or biometric passports. In the last quarter, this figure slightly increased to 22% (20% citing missing passports, and the rest referring to ID cards/internal passports or children's documentation). Approximately 20% of respondents reported that they would not be able to renew or obtain the missing documents.

Among the PM respondents, 23.1% sought assistance with passport issues from SE Document Services, while 10.3% reached out to Ukrainian consulates for help.

Urgent and information needs

The most pressing needs identified once again include employment, access to accommodation, and material assistance. Basic needs such as access to healthcare and food remain essential. There is also a clear need for psychological support, confirmed by nearly all key informants in semi structured interviews. Additional needs highlighted include economic integration and finding work aligned with qualifications, as well as language learning support.

There are ongoing needs for assistance with caregiver responsibilities, particularly related to the care of children and the elderly. In the last quarter, there was a noticeable increase in the needs of ex-combatants, especially in accessing basic services and psychological support. As one Protection Monitoring Officer noted:



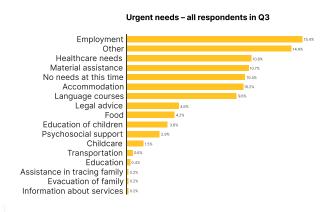
Our respondent, a 39-year-old man from Mykolaiv, needs psychological help to work through his distress. He came to Poland recently and has been at war all this time. He lost his hearing, one eye, and the limbs of his fingers. He is the only survivor of his unit, having hidden in a cemetery from a sniper. The Polish doctors are unsure whether they can perform surgery on his ear, and he has been seeking a psychologist specializing in PTSD for a long time.

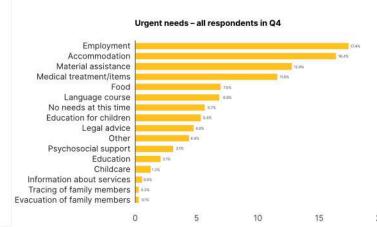
Special attention is needed for individuals over 60 years old. Their most pressing priority is material assistance, followed by healthcare needs.



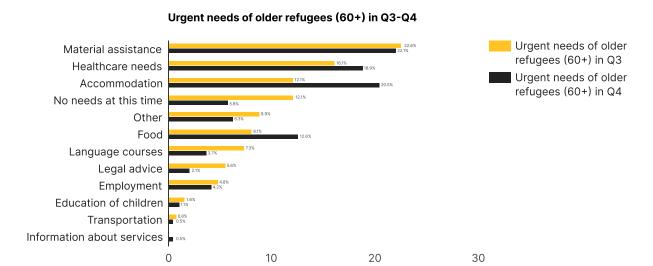
I would like to have more quality food, fruit, vegetables, something sweet, I don't have enough money. I never go out, I am not healthy, I don't have enough clothes, I get food from charity.

(Female, 72, Katowice)





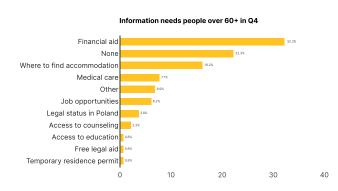
Situation in Poland



Notably, the priority needs are different for individuals with disabilities in Q4. The most urgent needs identified were accommodation (over 17% of cases), followed by material assistance and medical treatment, each at 15%.

Information needs

In terms of information needs, an increasing number of respondents in the last quarter (25%) indicated that they no longer required any information. However, there is still a demand for information regarding employment opportunities, as well as available financial and social support. Notably, 32.3% of elderly respondents highlighted a need for information regarding available financial assistance.



Legal needs

Among legal needs, the most common inquiries were related to the future and legality of residence, particularly in the context of the transition from the Ukrainian PESEL number (PESEL UKR) and temporary protection to the upcoming number CUKR. Additionally, there were requests for support regarding the 800+ benefit and enrollment in the Polish education system. The number of inquiries about the Residence Card and applying for international protection in Poland also increased. These trends are confirmed by reports from IRC partner organizations³.

Access to education and childcare

More than half of respondents' preschool-aged children attend childcare institutions. In other cases, children are not admitted to these institutions due to their age or in a few cases a lack of available spots in nearby nurseries or kindergartens.

Situation in Poland

As expected, the share of respondents with schoolaged children not enrolled in Polish schools declined. In Q3, nearly 16% reported non-enrolment; by Q4, it dropped to 6.4%. This decreases likely reflects legal changes related to schooling and 800+ benefits. Key barriers included lack of long-term plans in Poland, language difficulties, and bullying. Previously, some preferred Ukrainian online education. Among non-enrolled children, Ukrainian schools in Poland remained the main alternative.

Government data shows that since September 2024, around 33,000 children who were previously outside the Polish education system have joined Polish schools⁴. Experts estimated that in 2023, over 120,000 children were out of school.

OF

We've changed schools twice because they treated my child badly. One of the fathers said that Ukrainian children should not study with Polish children, so we moved schools and now my child is studying at a Ukrainian school in Warsaw.

(Female, 31, Warsaw)

My daughter faced severe bullying at a Polish school, and we were forced to continue her education remotely through the Ukrainian program. The bullying

caused a lot of distress. If they take away the 800+ benefit for children, I will find a higher-paying job, so my child doesn't have to go back to a place where she feels uncomfortable. I will do anything for the sake of my daughters.

(Female, 42, Warsaw)

Since 2024, IRC PM has also been monitoring educational challenges. In Q4, half of the respondents did not report any issues. However, the level of discrimination reports remained steady at 20-23% across the quarters. Additional concerns highlighted include:

- Bullying and Social Discrimination: Many children experience bullying from both Polish and Ukrainian classmates. Nationality-based discrimination is common, with extreme cases of physical violence⁵.
- Language Barriers: Lack of language support leads to integration difficulties and poor academic performance.
- Lack of Additional School Support: Parents reported the absence of cross-cultural assistants or tutors.
- Financial Constraints: Issues related to school fees, including Ukrainian school costs, textbooks, shoes, and clothing (especially for winter). High costs for food and tutoring also impacted families.
- Mental Health and Psychological Impact: Some children develop psychological distress due to school challenges, including bullying and adaptation issues. Anxiety related to eviction and housing insecurity also affects overall family well-being, as confirmed by the Child Protection Monitoring Report.



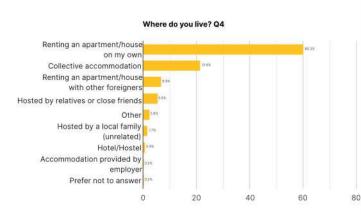
Photo: F. Pistilli

Situation in Poland

Access to housing

The majority of respondents reported living in rented accommodation — 67% in Q3, declining to 60% in Q4. Protection Monitoring was able to reach 21% of individuals currently living in collective accommodation, an increase from 15.7% in Q3. Regarding contingency plans, 44% would seek alternative rentals within the same city, if they lose current accommodation. The share of those considering free accommodation rose from 15% to 23%, while approximately 13% in both quarters expressed uncertainty. A few respondents (n=14) indicated intentions to return to Ukraine.

Where do you live? Q3 Renting an apartment/house on my own Collective accommodation Hosted by relatives or close Renting an apartment/house with other foreigners Other, specify Hosted by a local family (unrelated) Do not have anywhere to Prefer not to answer Hotel/hostel 0.3% 20 40 60 80



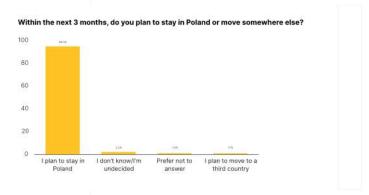
More data on housing challenges, uncertainties associated with accommodation, are described in the context of Risk 2.

Access to healthcare

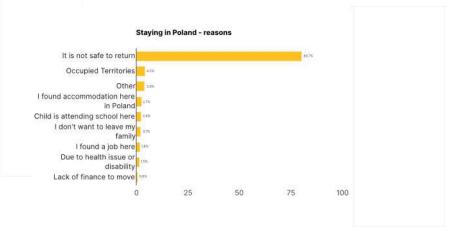
Over 30% of respondents in both quarters indicated challenges in accessing healthcare, with the most common issue being long waiting times. At the same time, around 50% of respondents reported having used Ukrainian healthcare services since the beginning of their displacement.

Intentions

In the last quarter of 2024, more than 95% of respondents indicated that they plan to stay in Poland for the next three months.



Among the reasons cited was the inability to return, due to danger and lack of safety at the place of origin, in more than 80% of cases.



Protection Risk 1

Risk of discrimination and stigmatization

Discrimination, whether overt or hidden, can manifest at multiple levels: institutional (reinforced by policies practices creating avoidable inequalities), interpersonal (occurring during individual interactions), and internalized (rooted in one's belief in their own group's inferiority). It may include physical violence, threats, insults, or systemic barriers that impede access to essential services such as housing, employment, education, or justice⁶.

In the second half of 2024, the data increasingly highlighted various forms of discrimination against Ukrainian refugees. Secondary data also confirms the negative impact of this phenomenon, with some experts suggesting that while the majority of Polish residents still maintain a positive attitude toward refugees, there are indications of "solidarity fatigue," sometimes referred to as the "deflation of goodwill." Instances of discrimination and stigmatization were evident in both qualitative and quantitative data.

Key areas where discrimination occurred included public transport, neighborhood interactions, and online environments. employment, instances were disproportionately experienced by women⁷. In this context, the concept of **gender-based** discrimination (GBD) emerged as a significant risk factor, with reports highlighting behaviors that belittled and discredited refugees, including verbal abuse.

Prevalent forms of discrimination:

- Discrimination based on national origin, gender, and especially language was visible across the data.
- Key discrimination settings were in public transport, neighborhood interactions, employment environment.
- Xenophobia and racism were particularly notable, with many citing an increase in these behaviors. Legal experts noted a growing number of incidents covered by Article 257 of the Penal Code, with frequent need for mediation due to the rising number of xenophobic and racist actions. This trend affected both children and adults, particularly individuals from Ukraine.

(I)

There is a significant rise in xenophobia and racism. We see this more frequently, and we have to intervene more often. It mainly concerns people from Ukraine, both children and adults.

(KII, lawyer, Sopot)

The visible and systemic nature of discrimination against Ukrainian refugees, especially women and children, reflects a critical risk area for protection and requires increased attention, both in terms of immediate interventions and longer-term policy adjustments.

Social cohesion

In the last quarter, the sense of "complete acceptance" among interviewed population, within the host society significantly decreased by nearly 20 percentage points compared to the feeling of acceptance shortly after arrival in Poland. In 50 cases, the feeling of acceptance shifted to "mostly accepted," while in 14 stories, individuals reported a transition from full acceptance to outright rejection. This shift may highlight growing challenges in social cohesion. The decline in acceptance may reflect increased tensions or fatigue in the host society, which could have implications for the well-being and integration of refugees. It is critical to monitor these changes and address the underlying causes of rejection to ensure that refugees continue to feel supported and valued within their new communities.



Photo: F. Pistilli

Threaths

Experience of discrimination from host country citizens: "The go back where you came from"

In Q3, over 27% of respondents, and in Q4, 30% of all respondents in quantitative monitoring reported experiencing some form of discrimination. Many highlighted a fear of harassment, especially when speaking Ukrainian or Russian in public. Refugees expressed concerns about facing repeated verbal abuse from Polish citizens. The most common forms of discrimination included verbal attacks on the street. in shops, on public transport, or in queues for medical and other public services. Some reported offensive shouts on the road, directed at Ukrainian-registered vehicles. In a few cases, anti-Ukrainian hate speech was also noted8.

OD

We can't speak Ukrainian because when they hear the Ukrainian language, they react inadequately, especially in public transport.

(Female, 38, Katowice)

O

It's better to speak Polish or just remain silent.

(Female, 45, Gdynia)

O

I'm afraid to speak Russian and Ukrainian because of the news about patrols beating foreigners on the street.

(Male, 51, Warsaw)

OD

I would say there is no discrimination before, but just yesterday I heard very harmful words from a man on the street.

(Female, 54, Warsaw)

OD

We went to the doctor and faced discrimination. He said that we came as freeloaders, Ukrainians that want everything for free, and he didn't help us at 2.am. Our child was having a high temperature, that was not going down. They started helping us after hours, and even after they were very rude to us.

(Female, 38, Katowice)

In several (n=11) cases, respondents reported discriminatory comments referencing historical events9. includina the Volhynian genocide¹⁰. Additionally, some respondents expressed fear of "patrols," which may refer to anti-immigrant militia groups, such as the "citizens' patrols" that operated in Poland for a period, particularly in football fan and farright circles. According to media reports, the intervention of the authorities and Polish police effectively stopped this growing practice¹¹.

I went to the doctor, and they started to mention Volyn to me. I was forced to change the doctor later.

(Female, 63, Katowice)

OD

Poles mentioned the Volhynian massacre and told me to go back to Ukraine. This incident occurred when I was speaking Ukrainian on the phone, with my husband.

(Female, 48, Warsaw)

Experts, humanitarian organizations, local NGOs, and human rights defenders point out that hate speech leads to stigmatization, discrimination, and violence. The unchecked presence of anti-Ukrainian narratives contributes to deepening divisions.

OF

I don't feel completely safe because some Poles behave aggressively toward us, and for this reason, I don't want to send my child to a Polish school. There was an incident in the spring where someone damaged our car because it had Ukrainian plates. My daughter has also been threatened by Polish children at the playground.

(Female, 35, Warsaw)

OJ

I ask my children not to speak Ukrainian or Russian in public transport, because we are guests here and to avoid making people angry and putting ourselves in danger.

(Female, 47, Katowice)

In 2024, Demagog's monitoring identified 327,000 anti-Ukrainian posts on Polish internet platforms, marking a 13% increase from 2023 (with a 39% increase in reach)¹². The scale grew in the second half of 2024, aligning with the risks identified by IRC in the last two quarters of the year. Specialists note that the media landscape available for monitoring provides only fragmentary information, and the identified scale of anti-Ukrainian content is only the "tip of the iceberg."

Discrimination from other Ukrainians

The respondents mentioned both ethnic and linguistic discrimination from Poles and fellow Ukrainians. Hostile attitudes and verbal abuse were often related to language and origin (Russian- or Ukrainianspeaking individuals, and people from eastern or western Ukraine).

UJ.

We are being discriminated against by our own Ukrainians because of the language.

(Male, 47, Katowice)

OD.

I was treated very badly. My friend once said that there is a lot of hatred from Ukrainians who came here a long time ago because refugees in Poland have social assistance and rights that they did not have. There is bullying among Ukrainians because of envy. I have an acquaintance who arrived in 2014 because of the annexation of Crimea, she said that it was very difficult here and there were no such opportunities like now"

(KII, Katowice, local NGO)

Another cause of discrimination within the Ukrainian group in Poland was verbal abuse directed at those who arrived more recently, from individuals who had been living in Poland for a longer period. The most severe forms of discrimination, according to IRC monitoring, were faced by people from the eastern part of Ukraine.

I feel discriminated more by Ukrainians than by Poles, because I am from Luhansk.

(Female, 68, Warsaw)

Bullying in school and peer violence

There are psychological problems because of this [bullying], my daughter sometimes doesn't go to school, and the teacher says we should change school. (Female, 42, Warsaw)

OD

My child hears "Go back to Ukraine" all the time.

(Female, 37, Katowice)

In Q3, over 30% of respondents reported that their children experienced bullying at school, primarily based on nationality. Additionally, among the in the education system, challenges parents/ caregivers of school-aged children ranked discrimination from teachers and peers as the second most significant issue. Among "other challenges in the education system" one-third of respondents (n=12) directly mentioned experiencing violence and bullying in schools. A similar observation was identified in Q4.

OD

We've changed 2 schools because they treated my child badly. One of the fathers said that Ukrainian children should not study together with Polish children. We changed schools and now we study in Ukrainian school in Warsaw.

(Female, 38, Warsaw)

O

My daughter faced very severe bullying at a Polish school, and we were forced to continue her education remotely through the Ukrainian program. [If they take away the 800+ benefit for children, I will look for a higher-paying job, so I don't have to send the child back to a place where they feel uncomfortable. I am willing to do anything for the sake of my daughters.

(Female, 42, Warsaw)

OD

I was told that teachers in kindergartens tell them not to speak Ukrainian, but it seems to me that this is a double stress, because they speak Ukrainian with themselves during the break and not with Poles. Bullying at school - all the time. It's a tragedy when no one wants to speak to a Ukrainian child and doesn't want to play with her/him. This affected even my child, this rejection in the society.

(FGD, Female, 39-55, Katowice)

IRC already highlighted the issue of bullying in the results of the Child Protection Monitoring. As a part of this monitoring, children share their experiences in Poland solely through their own stories and words. Approximately 80% of all interviews in the previous IRC's report, reported experiencing bullying at school. This was also one of the most frequently cited reasons for abandoning the Polish education system.

Discrimination and stigma in the labor market

It is constant devaluation: they say I know nothing, and I am only capable of cleaning, but when I clean, they say I'm overqualified.

(Female, 51, Katowice)

Several discriminatory practices are described in the subsection addressing the risk of labor exploitation. However, beyond the indicators of exploitation and also emerged information discrimination in access to the labor market. Some cases concerned situations where a candidate's refugee background (nationality-based exclusion) or administrative barriers (such as the lack of a residence card) were the reasons for job rejection. As described by one of the Protection Monitoring Officers

OD

The respondent said that her younger child faced discrimination because the child doesn't know Polish. There were also instances when she tried to get a job as a caregiver at a kindergarten, but they told her that if the parents found out the caregiver was Ukrainian, they would be outraged. This happened already many times, and she says that she is not even accepted for cleaning jobs anymore.

Additionally, instances of occupational segregation were identified, where refugees are steered towards low-paying, low-status jobs (such as cleaning or manual labor), despite having qualifications for higherskilled positions. Another reported risk involved workplace discrimination from both employers and colleagues, contributing to a hostile environment. This discrimination took various forms, including harassment, exclusion from workplace culture, microaggressions, and overt hostility.

OD

I work as a cleaner in an office, but I faced discrimination at my previous job. My manager kept finding reasons to pick me, so I resigned.

(Female, 42, Warsaw)

OD

I had a heart attack at work, due to conflict with other employees. I had 30 years' experience as a nurse, but I can't find work here as such. Currently, I am working on translation of all documents for the nostrification, and it is a very difficult and demanding process. No one hires Ukrainians if not for cleaining work.

(Female, 57, Gdvnia)

The issue of labor market discrimination is further corroborated by data from the Polish Economic Institute (PIE) on refugee employment. In in-depth interviews conducted by PIE, testimonies surfaced indicating potential workplace discrimination. These included unequal distribution of duties, wage suppression, employment without proper legal contracts, and harmful stereotypes¹³.

Discrimination and stigma in accommodation settings

OF

My mother passed away, and the shelter managers made us pay for the month when my mother wasn't alive anymore. We are constantly on edge, ready to leave. In one hostel, they didn't want to accept our family, because we speak Russian. Everyone there is from Western Ukraine. We left Mariupol, but my mother passed away after we had left. In this shelter, it is either you pay, or you work off the hours by carrying heavy loads.

(Female, 39, Warsaw)

Refugees may encounter institutional and social barriers when seeking or maintaining accommodation. Some shelters and landlords refused entry based on nationality, ethnicity, or language, with Russian-speaking refugees from Eastern Ukraine disproportionately affected due to linguistic and regional tensions. As identified in the last 6 months, in some instances, refugees faced discrimination from local residents who view them as burdens on welfare systems or competitors for housing assistance.

I was looking for a room and posted an ad on Facebook, but I received so much hate that I just couldn't take it anymore and deleted the post. It's really hard for me because I'm a single mother with no support. I was also fired from my job solely because of my appearance [a woman with dyed blue hair and eyebrow piercings] and only because of that. Because I worked really well!

(Female, 47, Gdynia)

In a few cases, landlords declined to rent to refugees, citing stereotypes about financial instability, cultural differences, or legal status concerns. In some instances, higher rental prices and deposit requirements are imposed on refugees, who are perceived as riskier tenants. As reported by one of PM Officers:

(I)

When asked about the attitude of Poles, the woman said that when she called the advert for an apartment, she was insulted at and told to return to Ukraine, and the owner of the previous apartment did not return most of the rent.

When I needed help, I couldn't find it. I was kicked out of the house and had to stay outside with my child. The authorities (OPS) couldn't help me, and I wandered around with my child.

(Female, 28, Warsaw)

A particularly concerning issue is the exploitation experienced in some of the private shelters and accommodation. Some privately arranged shelters in Warsaw have imposed labor in exchange for accommodation. Residents may be required to perform cleaning, cooking, or maintenance tasks under coercive conditions, often without legal recourse. The lack of oversight and accountability renders these shelters high-risk environments for abuse. Additionally, in some places refugees still face inadequate living conditions, an issue which is explained further under Risk 2.

OD

They [managers of the private shelter in Warsaw] are forcing us to work in the kitchen, and also buy food for the shelter, but I refused to do that. They denied me food then. The work includes kitchen duties, cleaning toilets, and outdoor labor in the facility. We pay them in cash, and they don't pay taxes. They also ignore all of our basic requests and questions.

(Male, 61, Warsaw)

OD

Due to living in a crisis center, we often face hostility from some Polish people who see us as competition for social housing and believe we should leave.

(Female, 45 Katowice)

Stigma, gender-based discrimination, and gender disinformation

Particularly in the last quarter of 2024, female respondents increasingly highlighted experiences of stigma and resulting discrimination directed at Ukrainian refugee women.

In Protection Monitoring, several narratives (n=16) referenced a recurring stereotype of "Ukrainian women taking Polish women's husbands or partners." Women reported verbal attacks in public spaces, as well as degrading and offensive content online, often accompanied by slurs and calls to "go back to Ukraine".

Gender-based disinformation and discrimination

Experts have increasingly drawn attention to the issue of gender-based disinformation (GBD). According to one definition, GBD refers to information campaigns that target or undermine individuals based on their gender. These campaigns often include tactics, narratives, or trends disseminated by hostile actors to mislead the public, perpetuate harmful stereotypes, and reinforce discriminatory perceptions of specific genders14.

the Zamenhof Institute A report by analyzed narratives disinformation specifically targeting Ukrainian women. Ukrainian women are frequently depicted as sex workers, "ideal wives", or women seeking to "steal husbands." Social media platforms and messaging apps, such as Telegram, are the primary tools used to spread this type of disinformation. Conversely, Ukrainian men are often portrayed within these narratives as "criminals". Gender-based disinformation can be understood as a form of gender-based violence, contributing to stigma and discrimination.

In Protection Monitoring data from the last quarter of 2024, some male respondents reported facing discrimination linked to perceptions that they should "stay and defend their country at all costs". Additionally, men described discriminatory practices at borders or when attempting to access services. Several cases highlighted challenges in securing accommodation, with landlords refusing to rent upon learning of their Ukrainian nationality:

When I was looking for an apartment, when they found out I was from Ukraine, they refused to rent me the flat.

(Male, 41, Warsaw)

In another case, following a conflict between a Polish man and a Ukrainian male refugee, the respondent reported that authorities refused to take his statement interpretation provide services, explicitly commenting on his nationality.

Systemic barriers and policy developments

Policy changes also shaped the context of and discrimination vulnerability for refugees. Proposals such as limiting the 800+ child benefit to refugee families where parents are (discussed further in the next section) sparked significant public debate, often disinformation narratives.

A key policy development in this period was the Polish government's presentation of its migration strategy, "Regain Control. Ensure Security. A Comprehensive and Responsible Migration Strategy for Poland 2025-2030"15 adopted on October 15, 2024. Experts and civil society representatives raised concerns regarding several aspects of the strategy, including its general vagueness, the proposed externalization of migration policy, the lack of consultation with NGOs and expert organizations, and the absence of robust safeguards protect migrants, particularly labor exploitation.

The strategy also introduced mechanisms that could potentially foster discrimination based on nationality or origin. It advocates for a selective visa policy and suggests assessing migrants' "integration capacity" when deciding on their admission to Poland. While the strategy frames integration as a two-way process, in practice, as pointed out by experts and local NGOs - it emphasizes assimilation, implying that the sole responsibility for adaptation lies with migrants. Furthermore, the strategy predominantly focuses on the risks associated with migration, while downplaying the positive socio-economic contributions of migrants Polish society. These shortcomings could contribute to negative public narratives surrounding migration and migrants.

Particularly controversial was the proposal to temporarily and territorially suspend the right to apply for international protection in Poland. Several provisions have been criticized for being inconsistent with international standards and human rights obligations¹⁶. Analysis also pointed out the limited use of available research, which was intended to inform evidence-based policy decisions¹⁷.

Notably, on November 25, 2024, a public hearing was held in the context of the Migration Strategy¹⁸. Organized by the Ministry of Civil Society and the Chancellery of the Prime Minister, with logistical support from the Stocznia Foundation, the hearing was a response to an open letter issued by 38 civil society organizations demanding greater inclusion of NGOs and civil society in the design and consultation process of Poland's migration policy framework¹⁹.

hearing, participants pointed contradictions between the strategy and Polish as well as international law, the situation at the Polish-Belarusian border, and the implications of suspending the right to asylum. Most participants were critical of the strategy, but they unanimously acknowledged that the initiative to create it was a positive step. The discussion also raised the importance of integration and concerns about the strategy's foundation, which is based solely on the negative effects of migration. Attention was also drawn to the lack of protection guarantees for particularly vulnerable groups and the importance of balancing national security with a humane and dignified approach to all people. Researchers and experts also pointed out the lack of a solid evidence base in the strategy, as it only minimally incorporated reliable research and scientific data. They emphasized the need for evidence-based solutions

Effect of the threat

An intersectional approach to analyzing protection risks acknowledges that discrimination stems from overlapping social identities — such as gender, migration status, and ethnicity — within broader systems of power and inequality. These intersecting factors shape individual experiences, often leading to compounded and multilayered risks. A comprehensive perspective on discrimination is crucial to capturing these complexities, as it highlights how different aspects of identity interact to influence exposure to protection risks. It is important to note that, in many cases, refugees have experienced multiple forms of discrimination and stigma.

Who is mostly affected and why?

- Women and single mothers with children face discrimination, particularly in the labor market, where they may be perceived as less reliable employees due to caregiving responsibilities, as well as in the housing market. Stereotypes around refugee women's dependency on aid also contribute to social stigma. They are also particularly impacted by gender-based disinformation.
- Elderly individuals, people with disabilities, and those with chronic illnesses encounter ageism and ableism, often facing exclusion from employment and social participation. As shown, their reliance on support services may lead to discriminatory perceptions of them as a burden, increasing social isolation and discrimination in accessing assistance. They are also excluded from the "integration strategies" that focus mostly on young people ready to be employed.
- Men of conscription age encounter obstacles related to their legal status, employment restrictions, and societal stigma. Some face pressure to return to Ukraine, while others struggle with limited access to humanitarian aid.
- Refugees from eastern Ukraine and Russianspeaking refugees as shown, experience linguistic and political discrimination, leading to hostility, mistrust, and barriers to integration and barriers to services.
- Refugee children: discrimination may manifest in access to education, where they encounter language barriers, bullying, or exclusion based on their nationality or migration status. Stereotypes about refugees may also influence how they are treated by peers and educators, contributing to social isolation. Additionally, children from single-parent households or those without stable housing may experience further marginalization, impacting their well-being and integration prospects.

 Refugees without a residence card face institutional discrimination, as their lack of "preferable legal status" excludes them from formal employment. This increases their exposure to exploitation and social marginalization.

What are the consequences?

- Health and **Psychological** Impact: exposure to discrimination and stigmatization can lead to severe mental health issues among refugees, including anxiety, depression, and post-traumatic stress disorder. In can also lead to physiological responses, internalization of negative stereotypes, damaging coping behaviors (like drug and alcohol abuse), physical violence, and unequal access to resources. The sense of isolation and rejection from the host society undermines their self-esteem and overall well-being. In addition to directly experiencing discrimination, witnessing or experiencing vicarious discrimination can also affect health.
- Social Isolation: Stigmatization often results in social exclusion, where refugees are marginalized and denied participation in community activities. This isolation hampers their ability to build supportive networks, essential for adapting to a new environment and fostering a sense of belonging.
- Economic Hardship: Discrimination in the labor market restricts refugees' access to employment opportunities, leading to economic Employers may harbor biases, consciously unconsciously, against hiring refugees, resulting in underemployment or unemployment. This economic marginalization perpetuates a cycle of poverty and dependence.
- Gender-based violence: Negative stereotypes, economic dependence, social isolation, and lack of secure housing increase refugees' vulnerability to exploitation, harassment, and abuse. Gender-based disinformation further fuels harmful narratives. heightening risks of violence. Barriers to reporting GBV — such as fear of discrimination or mistrust of authorities — can leave survivors without adequate protection or support.

- Barriers to services: Stigmatization can deter refugees from seeking essential services, including healthcare, education, and legal assistance. Fears of discrimination or mistreatment may discourage them from accessing these services, adversely affecting their health and limiting opportunities for personal development.
- Risk of homelessness and risk of eviction: Discrimination in the housing market poses significant challenges for those seeking safe and stable accommodation. Biases against refugees can lead to limited housing options, substandard living conditions, and exploitation by landlords. Many refugees are compelled to move frequently between temporary accommodation, such as shelters, hostels, and shared apartments, which undermines their sense of stability and security. It increases the risks identified in previous IRC PM reports.

Capacity

Cognitive and behavioral responses of affected populations

Some Ukrainian refugees in Poland cope with safety concerns and emotional stress linked to discrimination, by avoiding certain public spaces or adjusting "their behavior". Moreover, as a coping mechanism, some refugees deliberately switched to Polish or remained silent to avoid drawing attention to their foreign origin or language. As identified in PM, refugees rely on community support for emotional and practical assistance, particularly in dealing with discrimination.

This is especially evident in education and child protection, where many parents choose to enroll their children in Ukrainian schools in Poland. Labor market discrimination also limits refugees' economic mobility, pushing many into underemployment despite their qualifications. This reinforces stigma and increases the risk of labor exploitation, as refugees are often relegated to low-status jobs.

Limited access to information and administrative barriers

In the context of rising stigma and disinformation, counter-disinformation initiatives are particularly crucial. Organizations such as Demagog actively work to combat disinformation by identifying and analyzing anti-Ukrainian narratives²⁰.

The problem is further exacerbated by limited informational support through official government channels. The responsibility for providing information falls primarily on non-governmental organizations. Additionally, the Officer for Foreigners' information system - MOS 2.0 - designed to streamline the issuance of both standard residence cards and special CUKR cards (for refugees from Ukraine), has not yet been implemented.

Recent systematic solutions

The Polish Sejm recently amended the Penal Code to criminalize hate speech²¹, particularly targeting sexual orientation, gender, age and disability as part of a broader government effort to protect vulnerable and minority groups. Hate crimes based on nationality, ethnicity, race, religion, disability, age, gender, or sexual orientation will now carry prison sentences of 3 months to 5 years²².

Social campaigns and evidence-based approach

One of the important campaigns was the Save the Children campaign promoting integration between peers²³. Among Polish and Ukrainian publications that spread verified information and evidence-based solutions, there was also an IRC report highlighting the impact and situation of people from Ukraine three years after the escalation. It also examined the attitudes of the host society towards refugees.

At the beginning of 2025, the Ministry of Digitization announced a program to combat disinformation, primarily in the context of the presidential elections. The efforts made in this area could be expanded to address disinformation more broadly, considering its consequences for specific groups, including those particularly vulnerable, such as refugees²⁴.

Combatting bullying and peers' violence

In the broader framework of child protection, the Ministry of Justice established a Child Protection Team, bringing together experts and representatives from ministries, NGOs, academia, security services, and local authorities²⁵. The team is responsible for developing and regularly updating child protection standards. This initiative is particularly relevant in addressing issues of violence against children, including peer violence, bullying, and discrimination.

IRC participated in discussions regarding the fight against violence towards children during a preparatory session at the Ministry of Justice. The consultations focused on preparing Poland's commitments to violence against children framework of the ministerial conference in Bogotá²⁶.

The last six months have brought a series of positive changes and initiatives aimed at increasing the safety of children in Poland. According to Article 10 of the so-called "Kamilka Act," by August 15, after the transitional period, all institutions dealing with children must implement child protection standards into their practices and adjust their operations to comply with the law. Currently, efforts are underway to prepare the best practices for implementing these standards²⁷. Importantly, by the end of 2024, a proposal to amend the law was submitted as a result of monitoring the first few months of the standards' implementation. The proposed amendment aims to simplify the procedure for verifying the criminal background of individuals working or cooperating with schools.

For example, parents or guardians of school trips will only need to submit a declaration instead of a certificate from the criminal records office (KRK), fees for certificates for volunteers and interns will be abolished, and schools will not need to repeat background checks for individuals already verified by other organizations (e.g., sports clubs). Public trust individuals (e.g., police officers, judges) and guests invited to schools under teacher supervision will also be exempt from presenting certificates²⁸.

RECOMMENDATIONS

Polish Government and Local Authorities

- · Supporting and developing local integration and anti-discrimination policies that enhance the wellbeing of all residents. These policies should be evidence-based, built on good practices, and developed through dialogue with civil society.
- · Promoting integration as a two-way process, ensuring the active engagement of both migrants and the host society in building inclusive communities.
- Strengthening cooperation with local governments, municipal units, and institutions in the development of local integration policies.
- · Increasing the participation of migrants in the city's cultural and social life, including organizing cultural events that foster interaction between different national and ethnic identities.
- Supporting neighborhood- and district-level initiatives to strengthen social integration cohesion at the community level.
- · Developing a city dialogue strategy, as highlighted by local organizations, to engage residents and media in communicating the diversity of the community while promoting values of tolerance, openness, and inclusion. This should include the use of inclusive language that reflects the diverse identities of all residents.
- · Establishing an effective feedback channel for residents with migration backgrounds to ensure their voices are heard in local decision-making.
- · Enhancing the intercultural competencies of social workers and family assistants, with a focus on fostering cross-cultural communication and preventing discrimination
- · Facilitating the development of reporting and feedback mechanisms for migrants and refugees, leveraging existing safeguarding structures and feedback channels.
- · It is recommended to establish principles for safe interactions among minors, focusing on mutual respect while considering cultural, ethnic, racial, or differences. consequences religious perpetrators.

Local and international NGOs

- · Supporting the capacity-building of social workers and family assistants in intercultural communication and anti-discrimination practices.
- Localizing activities and strengthening initiatives, community-based including neighborhood and district-level programs led by civil society organizations.
- Enhancing cooperation with local governments, municipal units, and institutions in developing inclusive local integration policies.
- . Continuing the monitoring of the situation of refugees and migrants in Poland, with a particular focus on discrimination and misinformation
- · As local organizations and IRC partners highlight, it is crucial to strengthen the skills of teachers and students in preparing for conflict situations and responding constructively in the environment, based on proper assessment. An example of such practices is the CEO's conflict management approach in schools.

Protection Risk 2

Risk of restrained access to basic services and basic needs

Refugee households in Poland, as identified through the monitoring process, are often exposed to risks related to limited access to basic services, poverty, and social exclusion. These risks are reflected for example in severe material and social deprivation, insufficient access to safe housing, and disruptions in the provision of social benefits.

Threaths

Restricted access to basic needs

OD

I pay for utilities in Ukraine from my pension, especially during the heating season, and I don't have enough for food.

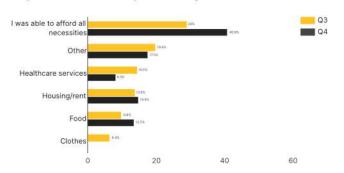
(Female, 68, Katowice)

O

I have no savings, I have debts. I do not receive child benefits because I do not have Ukrainian status, I was not granted it because I was in other countries before. The main reason why we stay in Poland is not only because of the war in Ukraine, but also because kindergartens in Ukraine are not equipped with proper bomb shelters and the education system in kindergartens is not well established.

(Female, 39, Gdynia)

Have you been unable to afford any of the following necessities in last 3 months? Q3-Q4



n Q3, only 29% of respondents reported being able to cover all essential expenses, meaning that nearly 70% of individuals faced difficulties in meeting basic needs. Many were unable to afford food, healthcare, clothing, rent, and other necessities. In Q4, more than 40% were able to cover basic needs, leaving 60% struggling with necessities such as food or rent. Notably, only 27% of respondents over 60 years old reported being able to meet their basic needs in the past three months. The rest indicated an inability to cover costs related to healthcare, housing, food, and transportation. The situation is even more dire among respondents with disabilities, with only 22% of them reporting being able to meet all of their needs.

Limited funds for essentials like medicine. My pension is PLN 400. The landlord buys me bread and pasta.

(Male, 72, Warsaw)

If I buy medicine, I have to refuse other purchases

(Female, 68, Gdynia)

Many respondents report financial difficulties, with some stating they cannot afford essential items at all. In 60 cases respondents reported saving on everything, in some saving everything for children's food.

Can't afford anything at all.

OD.

We don't have anything.

Everything is difficult. I couldn't buy fruit for my mother.

OD.

If my daughter didn't help, I wouldn't survive on my pension.

In the context of the next 3 months, refugees expressed significant concerns about meeting their basic needs, such as food and housing. Over 56% stated they would be unable to secure essentials like food or rent. Notably, this figure increased by 24 percentage points in Q4, with nearly 80% of respondents highlighting concerns about basic needs such as food or rent, alongside additional challenges in covering healthcare expenses (10.3%) and other costs. Considering the composition of the monitoring sample, which predominantly consists of women, these figures do not differ significantly for women separately. However, women living in households with at least one family member with a disability expressed 10 percentage points more concern about covering healthcare expenses (21%).

What are your primary financial concerns in upcoming 3 months? Q3 Meeting basic needs food Healthcare expenses Unforeseen emergencies Education expenses Debt repayment 0.37

These findings align with the UNHCR's 2024 regional analysis, which indicates that refugees face a high degree of economic vulnerability, with half of them living below the poverty line based on reported income.

Financial hardship and restricted access to labor market

Importantly, according to data presented by the government on January 23, 2025, 78% of Ukrainian immigrants (including war refugees, of whom 68% are employed according to NBP data) have entered the labor market in Poland, contributing 15 billion PLN in taxes and contributions to the National Health Fund (NFZ) and Social Insurance Institution (ZUS) in 2023²⁹.

However, it is crucial to highlight the most vulnerable groups, also visible among IRC's PM respondents. As reported by NBP, higher unemployment remains an issue among Ukrainian refugees compared to Polish citizens, with over 19% still unemployed. This is reflected in IRC's PM data, where 19% of respondents in Q3 were unemployed, and 18% in Q4. Moreover, immigrants employed in occupations more often performed by men tend to receive higher wages. The difference in median wages between immigrant and Ukrainian women was 25%. This significantly hinders the economic integration of refugee women in Poland.

The report highlights the large proportion of refugee women with children seeking part-time work, which presents challenges in the Polish labor system, compounded by the limited availability of legal parttime employment.

Approximately 9% of female respondents in Protection Monitoring indicated that caregiving responsibilities and lack of access to childcare services were the main barriers to entering the labor market. The caregiverrelated barriers are more pronounced in qualitative data. In every interview with key informants, it was emphasized that mothers with children face greater barriers and reduced access to the labor market due to caregiving obligations.

What's the problem with finding a job? Sometimes it's transport - maybe it's possible to get there, but who will take care of the kids? That's the biggest issue.

(KII, local NGO, Sopot)

OD

Let's not forget about mothers with very young children, or those who gave birth here. Sometimes foundations help them, but how can they go to work? Without family, a support network, or grandparents it's very hard to get a job. Rent takes almost all the money they have, and even then, we're talking about rooms.

(KII, Sopot, social services)

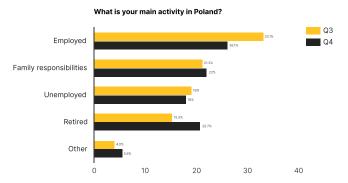
OD

I would like to have a job that would allow me to study and work, which is impossible right now since the working day is 12 hours. My friend has been looking for a job for two years now, but she can't find one because she has a child who has to be picked up from kindergarten at 4 p.m., but all the jobs she is offered end at 7 p.m. at the earliest.

(FGD, Female, 39, Warsaw)

Main activity and main source of living

Among the PM respondents, around 1/3 reported being employed in Q3, and 26% in the last quarter of 2024. The second most common activity is caregiving and family responsibilities, with around 20% of respondents mentioning this over the past 6 months. Additionally, there is a group of retirees among the PM respondents, consistently around 20% of those interviewed.



Tracking changes in main occupations after arriving in Poland also provides valuable insights. About 1/4 of refugees and displaced persons who were employed in Ukraine became unemployed in Poland. During this period, 25% of respondents reported a shift from employment to family and caregiving responsibilities. However, when asked about primary sources of income, wages from employment were not listed as the top source, which may indicate precarious work conditions. Instead, social support, such as the 800+ program, was most frequently mentioned (29% in Q3 and 27% in Q4). IRC's previous report highlighted issues related to low work intensity and the associated challenges.

Proposals for Changes in the Child Benefits System (*008)

A key issue in this context is the proposed changes to the 800+ child benefit system30, which would restrict eligibility to only working refugee parents³¹. These are controversial, particularly considering the difficulties faced by individuals with chronic illnesses. disabilities. caregiving responsibilities among Ukrainian refugees³². The proposed amendments do not account for specific situations such as children under the care of pensioners, parents with disabilities, children with chronic illnesses requiring constant care, or children with disabilities. Additionally, the proposal fails to consider children raised by single parents after the death of their Polish spouse, who have worked legally in Poland for many years. In this matter, 47 NGOs and nearly 30 experts in the field issued a statement opposing the proposed changes³³. Restricting social support could exacerbate financial challenges and increase the risk.

Conditions Living and **Precarious** Housing **Arrangements**

Many refugees report living in temporary or precarious housing, with no certainty about their future accommodation. The inability to afford rent or secure stable housing is a significant source of stress. Several respondents mentioned relying on free housing options, such as staying with acquaintances, living with Polish families, or being accommodated through social programs or collective sites. However, these arrangements are often temporary uncertain. Some respondents expressed that while they have shelter for now, the lack of long-term solutions forces them to continuously search for new housing options.

25

Restrained access to basic services and needs

OD

I can live for free until January, but after that, I don't know. I don't have 1400 zlotys, my pension is 300 zlotys, and there are no additional payments to the pension.

Every month, we have to apply to the voivodeship to extend our housing. I'm over 40, and my husband is a pensioner in Ukraine, but in Poland, it's not yet the retirement age. He is registered at the employment office, and they offer him work as a loader.

How long can you stay in this housing? Q3 No specific time limit Q4 I don't know More than 12 months 6-12 months No longer than one month 3-6 months Prefer not to answer

Over the past two quarters, approximately 50% of respondents indicated that there was no specified time limit for their accommodation. Around 20% still reported uncertainty about how long they would be able to stay at their current location. In Q3, nearly 20% of respondents said they could stay for no more than a year, while in Q4, this figure dropped to about 15%. Residents in collective accommodation were more likely to express uncertainty about the duration of their stay, with 41% in Q3 and 49.3% in Q4 reporting that they did not know how long they would be able to remain there.

OF

I feel just terrible, absolutely unsafe. We can't find housing. With my salary of 3500, renting a place is simply impossible. They tell me to rent something bigger, but how I can do it?

(Female, 33, Gdynia)

In both Q3 and Q4, the majority of respondents reported feeling safe or very safe in their place of residence (92% and 90.5%, respectively). Among those living in collective accommodation, around 24% in Q3 and 15% in Q4 felt unsafe or very unsafe. However, even among respondents who reported a high sense of safety, there were comments about inadequate or degrading living conditions, as well as uncertainty regarding how long they would be able to stay at their current location35.

Very safe Safe Unsafe Very unsafe

How would you assess the sense of security in the current accommodation?

The inadequate housing conditions included issues like leaking roofs, no water or electricity, or being asked to leave accommodation without alternatives.

I lived in a basement without water and electricity for a year, but it's fine, at least I know where the free showers are in the area.

(Male, 66)

As mentioned before, in collective accommodations (mostly identified in private type of collective sites) there is an alarming issue of exploitation and forced labor in some identified cases.

OD.

Now we live here. There was a time when people worked here in exchange for free meals; people even argued about getting that job. This is not ok.

(Female, 54)

OD

I feel safe in Poland, but the problem is that if I don't find money to pay the apartment, I will feel very unsafe.

(Female, 40)

OD

We live in limbo. We don't know anything, we haven't received help from any organizations. In the shelter they feed us, and we work here to stay in this shelter.

(Female, 69)

OD

They are forcing us to work in the kitchen and also buy food for the camp, but I refused. They denied me food. The work includes kitchen duties, cleaning toilets, outdoor labor and other things. We pay them in cash, I don't think they pay taxes. They ignore all of our requests.

(Male, 65)

In one of the stories collected by Protection Monitoring Officer:

O

Respondent in Warsaw, over 60 was living in a hostel room with 5 other people. Initially, he lived with his 15year-old grandson. He lived in the corridor of the hostel because if he was placed in a room, he would have to pay 1600 PLN for both of them, which they couldn't afford. The corridor was free. According to the respondent, all the NGOs and other organizations saw that the child was sleeping there, in the corridor, but didn't manage to change that situation. The child eventually, as reported, developed depression, stopped communication and even stopped washing and changing clothes. He returned to Ukraine to his father, in Kharkiv.

Based on comments and secondary data, a challenge is evident regarding the imposition of fees on individuals, including those listed as exempt from payment for collective accommodation. Many respondents, particularly those with disabilities or elderly individuals, reported being required to pay for collective accommodation. Another issue remains the regulation of private collective accommodation and the violations that arise in these settings.

If we don't find any place to live, we would probably have to go back to Ukraine. The prices even in the collective sides are inflated and to high, they are asking 4000 for 3 children and a husband.

(Female, 39, Warsaw)

OD

We lived in an apartment under the 40+ program and now we have no place to live, we don't know where to go, where to find accommodation. The hostel [collective accommodation] we called said we couldn't use crutches (my wife is on crutches and soon she will have surgery and doesn't know what will happen next). I can't work because I have a second group of disabilities.

(Male, 68, Katowice)



Photo: F. Pistilli

The most significant changes in accommodation support for Ukrainian individuals came with legal amendments that abolished the so-called 40+ program (Article 13, Act of March 12, 2022, on Assistance to Citizens of Ukraine Due to the Armed Conflict in the Territory of Ukraine). Article 13 allowed financial support for those providing housing and meals to Ukrainian citizens. Both private homeowners and those in collective accommodation benefited from this program. The termination of the 40+ program, effective July 1, 2024, had a considerable impact on the housing situation of refugees. As a result, new provisions under the special law introduced after July 1 now allow financing for stays in collective accommodation only through agreements signed with the Voivode. In July 2024, the National Federation for Resolving Homelessness issued a statement on the legal changes concerning assistance to Ukrainian citizens due to the armed conflict in their country. One of the challenges identified was that the program often served particularly vulnerable groups, including those with disabilities or chronic illnesses.

Effects of the threat:

Who is the most affected and why?

- Elderly Refugees: Elderly individuals, especially those with disabilities, report a significant difficulty in accessing healthcare, meeting basic needs, and securing housing.
- Single Mothers and Caregivers: Women, particularly those with caregiving responsibilities, are disproportionately affected by barriers to employment, such as the lack of affordable childcare and flexible working hours.
- People with Disabilities: Individuals with disabilities
 face unique challenges in terms of financial support,
 housing, and access to essential services. Their needs
 are often unmet, as evidenced by the higher rates of
 concern regarding healthcare and the limited ability to
 secure stable housing.

- Women-headed Households: Refugees who are mothers or single caregivers have additional burdens related to balancing childcare with economic survival. The proposed cuts to child benefits may further marginalize this group, exacerbating their vulnerability.
- Refugees in Collective Housing: Refugees in collective accommodation face threats of exploitation, with some being forced into unpaid labor or enduring poor living conditions, adding to their overall vulnerability. This is compounded by the uncertainty surrounding the length of stay in accommodation centers, and their substandard conditions. The effect is compounded by unaffordable rents and discrimination in the housing rental market.

Effects of the threat

- The restricted access to basic needs for refugees in Poland, particularly in terms of insufficient access to food, healthcare, and housing, has far-reaching effects, exacerbating the risk of social exclusion, poverty, and material deprivation. As many households struggle to cover essential expenses, including food, rent, and medical costs, they face growing financial instability. This results in a vicious cycle of poverty, where limited access to basic services leads to increased risk, which in turn restricts opportunities for economic integration. Refugees with limited financial resources, especially those with disabilities or elderly family members, are most at risk of being socially excluded, marginalized, and unable to fully participate in the host society.
- Nutritional deficiencies are another significant consequence of this restricted access to basic needs. Many respondents have reported inadequate food security, with some unable to afford even the most basic items. This lack of access to sufficient and nutritious food affects not only the physical well-being of individuals but also their cognitive functioning and energy levels, particularly among children and the elderly.

- The mental and physical health impacts of restricted access to basic needs are profound. In addition to the stress and anxiety stemming from financial hardship, individuals often face deteriorating health due to inadequate nutrition, insufficient medical care, and the physical strain of living in substandard housing. Reports of respondents not being able to afford necessary medications or healthcare services underline the toll on mental and physical well-being. Over time, this may lead to chronic conditions, depression, and a decrease in overall life satisfaction, further entrenching vulnerability.
- Lastly, the risk of homelessness and precarious housing situations is exacerbated by the inability to secure stable housing. Many refugees live in temporary or overcrowded accommodations, and with no long-term solutions in sight, they experience constant uncertainty and stress. This housing insecurity is often linked to precarious employment, where individuals take up exploitative work in exchange for accommodation, thus increasing the risk of labor exploitation and human trafficking.



Photo: F. Pistilli

Capacity

Extreme Poverty in Poland

According to the Poverty Watch 2024 data, 2.5 million Poles are living in extreme poverty, and over 17 million are living below the social minimum. This is the worst result since 2015. The 2023 report highlighted a significant rise in poverty levels among children, seniors, and people with disabilities. Extreme poverty among children increased from 5.7% to 7.6%, meaning that more than 500,000 children are now living in extreme poverty. The Szlachetna Paczka report indicates that in 2024, this number increased by 125,000 children. Among seniors, the poverty rate rose from 3.9% to 5.7% (around 430,000 people)³⁵. There was also an increase in poverty among households with at least one person with a disability, from 6.7% to 9%.

In Poland, according to the Szlachetna Paczka "Biedańsk" report, only 37% of people in extreme poverty were receiving cash benefits from social assistance. The rest exceed the income threshold of 776 PLN, meaning they do not qualify for support under the current system³⁶.

While available data, as indicated by Poverty Watch, still insufficiently address the situation of refugees (partially included in the 2024 NBP report), the national situation affects particularly vulnerable groups, including refugees. This broader context should be considered when evaluating the situation of refugees in Poland.

Access to social benefits

Only a small percentage (7%) of PM respondents indicated issues with accessing social benefits. However, most of these concerns were related to individuals with disabilities. In these cases, the problems were mostly about access to pensions or disability allowances in Poland. Some issues also arose regarding the 800+ benefits, particularly when documentation for children was missing. A few respondents faced issues related to changes in school attendance requirements, which affected eligibility for child benefits.



Child payments were initially denied because children were not yet enrolled in a Polish school. Delays occurred due to lack of school attendance certificates

(Female, 31, Warsaw)

In 2024, Poland spent over 2.8 billion PLN in 800+ benefits for Ukrainian citizens. Approximately 800,000 individuals from Ukraine were contributing to the Social Insurance Fund. The benefits were distributed to 292,000 Ukrainian children, indicating that not all families were receiving child benefits³⁷.

Under the Polish Law on Assistance to Ukrainian Citizens, Ukrainian nationals are entitled to social benefits on the same terms as Polish citizens. To access these benefits, it is necessary for individuals to obtain a PESEL number (Article 29, Act of March 12, 2022, on Assistance to Citizens of Ukraine Due to the Armed Conflict in the Territory of Ukraine). Social assistance benefits are also available to Ukrainian



Photo: Francesco Pistilli for IRC

Coping mechanisms - housing and basic needs

If housing support ends or eviction happens, most of the refugees will look for another rented apartment/ room (44.8%). Nevertheless, many refugees face a limited set of coping strategies, including:

 Searching for another temporary solution (e.g., hostels, acquaintances, humanitarian programs)

OJ.

We would be looking for a hostel because paying is unrealistic.

(I)

Only outside of Warsaw, here it's impossible to find anything for free.

 Considering relocation within Poland or another country

CJ.

If we won't be able to pay here or find something for free – we are exploring relocation to another country.

Returning to Ukraine, despite ongoing risks

There is heavy bombing in Ukraine, I cannot return, so I don't know what to do, but that might be my only option.

(I)

Right now, there are intense military actions, and returning is impossible. But if I have to be homeless here, maybe it is better to go back.

 Many respondents report actively limiting spending, prioritizing only the most essential expenses. Several individuals indicate sacrificing personal needs

And now I limit all my expenses, and I have nowhere to go, my city is destroyed.

I am saving on everything.

OD

I am always saving, not only the last 3 months.

O.

I am trying to budget carefully to afford food for children.

Access to employment

As highlighted in the 2024 Refugees on the Labor Market report, one respondent had to send out nearly 200 CVs before securing a job — an example of the significant barriers refugees face in accessing employment. Beyond language barriers, many are forced to change professions and accept jobs far below their qualifications. Compared to pre-war migrants, refugees are disproportionately affected by skill underutilization, which often leads to deskilling and pushes them into low-wage, temporary, or even irregular employment³⁹.



Refugees in Poland also experience an increase in routine task intensity (RTI), meaning they tend to perform more repetitive, less skill-demanding tasks compared to their work in Ukraine, resulting in "task degradation"40.

According to IRC's Protection Monitoring (PM), the majority of respondents reported working in cleaning and related services (n=22). Researchers and experts also emphasize the significance of the domestic work sector41.

Moreover, refugees and refugee women sometimes struggle with the lack of recognition of Ukrainian certificates and diplomas, as well as difficulties in obtaining labor market information. This is reflected in IRC's PM data. In both Q3 and Q4, language barriers remained the top challenge for individuals aged 18-59 (around 24%). Among women, 23% reported facing this issue. Additionally, 11% of female respondents specifically highlighted the lack of access to childcare services as a significant challenge. For women aged 25-34, this concern was even more pronounced, with 23% identifying childcare access as their primary difficulty.

In this group of women (40 respondents), social benefits were the primary source of income, with earned income from a partner coming second. Only 11% of these women identified employment in Poland as their main source of income.

According to the Polish Economic Institute (PIE), the employment rate for individuals who know Polish was 82%, while for those who do not, it was 50%. Furthermore, the response rate to job advertisements for Ukrainian candidates, both for roles requiring no specialist qualifications and those requiring qualifications, was 25% lower compared to Polish candidates42.

Despite these challenges, the PIE study, based on indepth interviews (n=20), shows that refugees appreciate the support they receive, including from public institutions, international organizations, and civil society. Key support elements include informational sessions helping refugees understand the specifics of the labor market and vocational counseling. However, discriminatory practices in recruitment processes have also been identified⁴³.

One key informant from a Job Center in Warsaw highlighted the experiences of women with higher education and those who had never unemployed:



These are people who often agree to any job, even physical labor. They have to decide to work below their qualifications, which is very difficult. Despite this, it will be easier for someone who worked physically in Ukraine and will continue doing so here. The process of retraining does happen, and offices assist in this. Sometimes it's difficult to obtain the necessary documents. But we try to support registration and provide comprehensive assistance. MOPSy (Municipal Social Welfare Centers) and other centers help as well, along with networking between public institutions and the third sector

Public institutions, such as job centers, play a crucial role in supporting refugees in the labor market. According to government information, refugees can receive free assistance from the county labor office (340 locations) or regional labor offices (16 locations), mainly through job mediation and vocational counseling..



⁴⁰ Read more about the trajectories of refugees in the labour market, in relation to employment in Ukraine AND in Poland after forced migration: Occupational Downgrading, Job Tasks, and the Return Intentions of the Ukrainian Refugees in Poland | Publications | CESifo

³¹ RESCUE.ORG 41See more: Decent domestic work : women working in Poland under the "Special law" (2024).

⁴² See more: <u>Uchodzcy z Ukrainy na polskim rynku pracy</u> (2023).

Support for Refugees in the Polish Labor Market: **Challenges and Good Practices**

As part of IRC's monitoring, interviews were conducted with representatives from labor offices in Gdynia, Katowice, and Warsaw. There are various best practices in place, including language courses, informational sessions, vocational counseling, and incentives to encourage employers to hire foreigners. Some labor offices have hired additional staff who speak Ukrainian to facilitate the integration of refugees into the labor market. These measures are particularly important given the uncertainty and concerns among employers about the legal status of refugees in Poland over time. As one representative from a labor office in Katowice mentioned:

Employers are sometimes afraid of uncertain refugee statuses, fearing they may leave overnight. This issue is not helped by the lack of clarity regarding regulations on changing the status from UKR (Ukrainian refugee status) to CUKR (Temporary Protection Status) and the limited time under the Special Act, which affects the legality of refugees' stay after the expiration of that time.

(KII, lawyer, NGO, Gdynia)

Public Employment Services (PUP, Państwowe Urzędy Pracy) and District Labor Inspectorates point out that employers still need to be informed about the employment conditions for Ukrainian citizens, such as the formal obligation to notify the labor office within 7 days of employing a refugee⁴⁴. Despite the recent amendments to the Special Act, which shortened the notification period, the core regulations regarding the legal employment of Ukrainians remain unchanged.

A representative from a labor office in Gdynia shared:



Our work also involves funding additional procedures, such as English language exams, and helping with obtaining a Residence Card. Raising awareness and informing employers about the option of hiring Ukrainians is important. The market seems to already have a lot of knowledge about this. Our focus is on reaching those employers who have not yet hired foreigners, helping them understand the support options available to them. Information for employers is very important.

(KII, PUP, Gdynia)

Additionally, the Ministry of Family, Labor and Social Policy offers the so-called Green Line, which connects labor offices with people who have UKR status (temporary protection)⁴⁵. A number of international organizations (including IRC and IOM) and local organizations (such as Homo Faber in Lublin, the Multicultural Center in Warsaw and Polskie Forum Migracyjne, Ukrainian House, FIIW and the centers Krok do Pracy, Barka in Poznań, the Konvalia Foundation, and many others) are involved in providing support to refugees accessing the labor market. Furthermore, Municipal Family Assistance Centers (MOPR) and Social Work Centers, as well as MOPSy (Municipal Social Welfare Centers), play an important role, although, as many acknowledge, the support remains insufficient. Representatives of these offices have indicated the need for better coordination and information sharing between institutions. As one respondent from social services in Warsaw said: "Each MOPR, MOPS operates differently - we need a platform to structure and regulate this." This sentiment was echoed in interviews from other cities as well.



Photo: K. Jonderko

33

Restrained access to basic services and needs

Limited access to housing

In Poland, 2024 has seen a significant increase in homelessness, including a 54% rise in homeless children, as highlighted by Poverty Watch 2024. This trend is especially concerning when considering the hidden homelessness of Ukrainian female refugees in collective accommodation centers (OZZ). situation of refugees, particularly those from Ukraine, highlights issues not fully captured in government's official data on homelessness.

Over the past three years, IRC Protection Monitoring has consistently highlighted the risk of homelessness among refugees, most recently in its second-quarter 2024 report. In the latter half of 2024, key informants once again underscored the increasing severity of this issue.

Several non-governmental initiatives are addressing this issue, such as the "Krok do domu" program by Habitat for Humanity, which supports Ukrainian refugees with housing, rental agreements, and language learning services. Another approach is the "Housing First" model, which focuses on addressing homelessness by emphasizing fundamental right to housing, with a human-centered approach⁴⁶.

Several non-governmental initiatives are addressing this issue, such as the "Krok do domu" program by Habitat for Humanity, which supports Ukrainian refugees with housing, rental agreements, and language learning services. Another approach is the "Housing First" model, which focuses on addressing chronic homelessness by emphasizing fundamental right to housing, with a human-centered approach⁴⁶. Another program supporting people from Ukraine, after leaving collective accommodation centers, is the 'Together to Independence' project. It is led by the Ministry of the Interior and Administration in partnership with the Polish Red Cross and the Polish Centre for International Aid (PCPM)

By the end of 2024, 6% of people facing homelessness in Poland were from Ukraine⁴⁷.

For those who left Ukraine after February 24, 2022, they are entitled to 120 days of free accommodation in collective centers (OZZ) from their arrival date. After this period, accommodation costs increase gradually, depending on the standard. Only the most vulnerable groups — such as individuals with disabilities, the elderly, pregnant women, and mothers with infants under one year old — are exempt from these fees. According to the Polish Center for International Aid, insolvency, debt, and overdue rent can result in the loss of housing, as individuals in debt are not allowed to leave Poland. Others may leave their housing due to violence or relationship breakdowns⁴⁸.

Residents of collective accommodation centers are at risk of homelessness, as these are institutional facilities without long-term security. There is still a lack of clarity on how long specific OZZ centers will remain operational and at what scale. In the Mazowieckie Voivodeship, about 3,500 people remain in OZZ at the end of 202449.

There is also growing recognition of the need to individuals living in private accommodation without tenant rights, as they face housing exclusion. Refugees, particularly women, who have been staying in private Polish citizens' apartments on a lease or loan basis, are excluded from tenant rights under Polish law. This creates a precarious situation, which should be considered a form of housing exclusion50.

The Government's Social Services Development Strategy 2030 and the National Program for Combating Poverty and Social Exclusion also address support for individuals facing homelessness. In 2024, Program Overcoming Homelessness introduced to provide further assistance.

RECOMMENDATIONS

Polish Government and Local Authorities

- · Mapping resources and needs in the housing market, with a focus on groups at heightened risk, including refugees.
- · Developing local housing solutions and policies aimed at improving access to housing for both Polish citizens and migrant and communities.
- · Restructuring existing support systems for people experiencing homelessness, including shelters and emergency facilities, to better address the needs of migrants and refugees facing housing insecurity.
- · Integrating the needs of new city residents with migration experiences into sectoral assistance and social work policies, ensuring inclusive and responsive support systems.
- · Ensuring that helplines for refugees in each voivodeship are accessible in languages spoken by refugees, providing clear information on available facilities, space availability, and a mechanism for reporting abuses.
- · Enhancing coordination and information-sharing with public institutions, including Labour Offices and Social Welfare Centres, to strengthen support and monitoring efforts.

Local and international NGO

- Monitoring the situation of refugees in Poland, with a focus on access to basic needs and essential services.
- Supporting structural reforms in social assistance and social work systems, ensuring they are inclusive and responsive to the diversity and specific circumstances of refugees and migrants.
- Promoting an inclusive approach to integration, recognizing that it should not be solely based on labor market participation but should also consider particularly vulnerable groups who are unable to engage in employment, ensuring their access to basic needs and services.

Protection Risk 3

Risk of labor exploitation

CJ.

Abuses? A whole range of them. Contributions are not paid, and employment contracts are often abused, such as work-for-hire or commission-based contracts. Some people have had a work-for-hire contract for several years. Symbolic wages. Employment also often occurs without contracts, of course. Furthermore, many people are forced to work in food delivery or as taxi drivers because they cannot find anything else. Of course, if we know about unemployed people, we direct them to the Employment Office. We also offer career counseling and informational sessions on labor law as part of integration programs. These are much needed.

(KII, social services, Gdynia)

There is still a lack of systematized data regarding the scale and the phenomenon of labor exploitation among Ukrainian refugees in Poland. In Poland, cases of exploitation of people from Ukraine, as well as foreign nationals from Venezuela or Colombia, are increasingly being reported. Risks associated with exploitation are also raised not only in Poland⁵¹. Research conducted in the UK regarding Ukrainian refugees indicated conclusions consistent with IRC's Protection Monitoring. It points to the main areas that increase the risk of labor exploitation, including housing insecurity and dependencies, structural challenges in the labor market, immigration insecurity and limited access to legal assistance, and gaps in identification and response mechanisms to combat trafficking and exploitation⁵². These findings align with IRC's Protection Monitoring conclusions⁵³. Trends highlighted in IRC data were also reported by the European Agency for Fundamental Rights and UNHCR54.



A foreigner is exploited in the workplace, period.

(Katowice, KII, social services)

In IRC Protection Monitoring six focus groups during Q3 and Q4 of 2024, 22 Ukrainian women shared their experiences. Eight did not report labor exploitation, though some faced workplace discrimination. Fourteen described elements of labor abuse and exploitation. While not representative, these insights highlight individual challenges in the labor market. Key Informant Interviews with employment offices, local organizations, crisis centers, and community leaders also revealed cases of labor abuse.



Photo: F. Pistilli

From exploitation risks to mitigations: looking back locally on the implementation of the UKs Ukraine Schemes

Ukrainian refugees reportedly subject to labour rights abuse & risk of exploitation, amid high levels of informal employment - Business & Human Rights Resource Centr

See more: Ukraine schemes FINAL.pdf

Threats

Among the most frequently mentioned elements of discrimination, exploitation, and abuse, respondents pointed to:

 Different wages, both in terms of employment agreements and contracts (if such existed), and wage disparities between Polish and Ukrainian workers at the same positions.

OD

I wasn't told about the benefits that other Polish employees had and different money. It was a job from 8 am to the evening, I worked on Christmas and New Year's Eve, from July to February without a single day off. I could be called to work at any time. I worked both at home and in the office. When I was asked if everything is okay, I replied 'yes,' although it wasn't true. Only Ukrainians were treated like that, Poles had days off, and all benefits

(FGD 2, Female, 35-39, Warsaw)

OD

Our Polish colleagues work less, we do their work, but they are paid more

(FGD, Female, 55-66, Katowice)

 Working conditions differing from the agreement, which often involved an excessive and unforeseen workload beyond the scope of duties agreed for the given position.

(I)

When I got there, they treated me like a slave. I consulted with a lawyer about whether they could do that (change the schedule whenever they wanted). I wanted to go to court, but I was afraid. They can change the schedule in case of force majeure, but they took advantage of this, and the legislation doesn't even define what force majeure is. The manager was gaslighting people. Employees would come in, and their shifts would be extended by 3 hours after they were supposed to go home. We were insulted, called stupid, and so on

(FGD, Female, 35-49, Warsaw)

OD

I worked at a company that rents apartments. I worked in cleaning, but my responsibilities included many other tasks that were not in the contract. I was a decorator, did some shopping, counted what was missing, made the beds, and did other things. There were more duties than were agreed upon

(FGD 2, Female, 35-49, Warsaw)

(J

Here, working for Ukrainians is a nightmare, they avoid paying taxes and delay payment of salaries. Through a career counselor at one of the NGOs, I got a job where I was paid for only one month and if I hadn't demanded a payslip I would have never received it. I left in March and received the money for six months of work and then in parts (300 PLN for the first week and 500 PLN for the other). When I was fired, I was brought a timesheet, and only 2 hours of work were written there, and because of this, I could not apply for a residence card. I was devastated

(FGD, Female, 50-55, Warsaw)

 In some cases, wages were not paid at all, but respondents frequently mentioned delayed wages or payments made with several months of delay.

My first job was at a factory, I had one shift there, but I immediately realized that I couldn't work there. It felt like Ukrainians were treated as inferior (the attitude towards Ukrainians was worse) compared to the Poles. This attitude came directly from the factory management, from the people who were overseeing the process. There was more negativity than positivity, even the distribution of workspaces was terrible

(FGD, Female, 47-51, Gdynia)

• Inappropriate working hours: In all 14 cases of respondents, the working hours were inappropriate, usually requiring work from 10 to 14 hours, even up to 16 hours in extreme cases. Furthermore, in some informal groups, these working hours were even listed in job advertisements. As one of the participants in the focus group in Katowice said:

OD

Job advertisements often specify that the position requires working 12 hours a day, seven days a week. Is that ok?"

(FGD Female, 55-63, Katowice)

OD

I worked in Poland (...) and my employer greatly exploited the fact that I didn't know my rights at first. The contract stated that I worked from 9:00 to 16:00 but in reality, I worked and was on call around the clock all the time. The boss was constantly bothering me and calling even at night. I only recently found out that I should have been paid more for overtime. It took me two months to recover from this, and just crying into my pillow.

(FGD, Female, 55-63 Katowice)

OD

They said that I worked according to the schedule, but it was not true because we worked constantly and seven days per week. I regret that I have no evidence that this is a violation. The boss was constantly manipulating and saying he would find someone else.

(FGD, Female, Gdynia)

O

"I don't know. 10/12 hour working day—nowhere else in Europe is there such a thing! And here people are like slaves! And breaks only for 15 minutes, it's very hard. How can you take care of a family with such a schedule? While the Poles work until 16:00. There should be a normal work schedule.

(FGD,, Female, 55-66, Katowice)

• Lack of contracts or the overuse of "contract of mandate" agreements, in most cases. Only two of the respondents had a standard employment contract, while the rest had "contract of mandate" agreements (n=17) or, in 3 cases, no contract at all. Furthermore, contracts were often given only in Polish, which over 8 focus group participants and 6 key informants pointed out.

OD

We often meet people working on a 'contract-for-a-specific-task' who are exploited. Particularly in our context, in the hospitality industry, because there is no industry here. Big hotels hire external agencies, and they behave in various ways. Temporary work agencies have nothing to do with employment ethics and safety. There are cases, for example, in housekeeping where people have to wait for 2 hours to clean a room, supposedly nothing dangerous because they are waiting, but they don't receive any pay for these hours. We had cases where groups had to walk to nearby towns for work, employed without contracts

(KII, Sopot, social services)

(I)

I was working in the care sector. I had a medical degree. There was no cleaner there, the person who worked with meat was the same person who washed the floor. They didn't want to register me, they paid me in cash and didn't want to pay me at the end, I didn't have any contract. I heard that Ukrainian women had worked there before and had problems with payment, too. I received 60-100 PLN at the end of the day, and it was very humiliating.

(FGD, Female, 55-63, Katowice)

CI.

I was not paid at all for the 1st day (for 11 hours of work). My second job was as a cleaner at a factory, which was very hard because it was working with chemicals, they paid me under 'contract-for-specific-task' contract. All Ukrainians had 'contract-for-aspecific-task.

(FGD, Female, 55-63, Warsaw)

OF

There were no problems with payment, but they didn't want to hire me officially, and there was no contract, only contract of mandate even though I worked there for 3 years. And there were work conditions that weren't agreed upon at the beginning.

(FGD, Female, 35-49, Gdynia)

O

They told me to sign the contract now and read it at home. But the fact itself was unpleasant. The contract was in Polish, and at first, it was difficult for me to read. Then the bullying started.

(FGD, Female, Warsaw, 35-49)

 Discrimination and bullying by employers and employees: In several cases (n=13), some form of bullying or discrimination was reported in the workplace. These incidents occurred both from employers and other employees.

W.

Once I dyed my hair unsuccessfully and put on a beret to hide it, and one colleague tore it off of my head, it was very humiliating. The next day I signed resignation, the director did nothing to the woman who insulted me. I had signed a contract, they paid me everything, but did not pay a bonus, which was the amount of the salary. I heard that the employment center paid a lot of money to companies for hiring us, but in reality, we worked almost for free.

(FGD, Female, 55-63, Katowice)

O

And why do you need a day off? They asked me when I requested annual leave, and they said, 'To get drunk and sit at home?

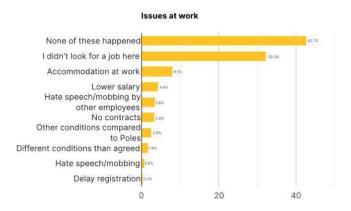
(FGD, Female, 35-49, Gdynia)

OD

Once we went to the job fairs, and the woman (employer) asked me only one question about what I did in Ukraine and then said, 'Do you really think you will find normal work here?' It was a great humiliation. I was told that my work is to clean the dishes.

(FGD, Female, 55-63, Warsaw)

In quantitative PM, abuses are much less visible, as over 42% of respondents reported no abuses, and 32.3% did not seek employment. For the first time, more than 8% of people reported accommodation issues at work, which could indicate potential exploitation. This mostly concerned people forced to work where they were accommodated.



However, these data do not reflect the full extent of the problem, as the same individuals who reported "no issues" often shared cases of exploitation and discrimination in the survey comments. One of the common reasons for this is the frequent lack of awareness regarding what constitutes exploitation. The importance of consent in exploitation and abuse has already been highlighted by IRC in previous PM reports.

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Who is affected and how?



Another vulnerable group is mothers with small children. When I came to Poland, I faced this problem myself: I had to take my child to a kindergarten and then pick him up because there was no one else to do it, so I couldn't work at full-time job and there was a huge problem with employment. This is a real problem when a woman with a small child cannot find a job, and she has to survive somehow.

(KII, Local NGO, Katowice)

- Refugees with caregivers' responsibilities (especially women) face discrimination, particularly in the labor market, where caregiving responsibilities are seen as a liability. Women, particularly single mothers and older women (50+), face compounded risks of labor exploitation due to urgent financial needs, caregiving duties, and limited job options. The lack of choice forces them into precarious, low-paid, and often contractless work, deepening gendered economic insecurity.
- Elderly individuals, persons with disabilities, and those with chronic illnesses experience systemic barriers due to ageism and ableism. Intersectional vulnerabilities intensify for women with disabilities, who face fewer employment opportunities and greater dependence on employer goodwill, making them less likely to challenge abuses.
- Refugees with limited Polish proficiency, especially women, are further marginalized as employers exploit language barriers to obscure contract terms and manipulate working conditions.

- Refugees without a residence card face institutional discrimination due to their lack of a "preferable legal status," which can exclude them from formal employment and social benefits. This makes them more vulnerable to exploitation in informal labor markets and increases their risk of social marginalization.
- Refugees in precarious employment are particularly at risk of labor exploitation due to their dependence on irregular or short-term work arrangements. Many are employed in low-wage sectors, such as construction, agriculture, and domestic work, where informal agreements and lack of legal protections expose them to underpayment, excessive working hours, and unsafe conditions. Women, especially those employed in domestic or caregiving roles, often experience additional vulnerabilities, including non-payment of wages and threats of dismissal if they report mistreatment.
- Those in employer-provided housing endure an added layer of control, where job loss equates to homelessness, trapping them in exploitative cycles.

Effects

- Health implications: The threat of labor exploitation is associated with adverse health impacts, both mental and physical. The stressful and abusive nature of exploitative work conditions can lead to physical ailments, anxiety, and depression. It can cause longlasting psychological trauma, feelings of helplessness, fear, and loss of self-worth.
- The risk of being trapped in an exploitative cycle increases vulnerabilities and may contribute to negative coping strategies. If not addressed, labor exploitation may escalate to more dangerous forms of forced labor and other protection risks.
- The prevalent exploitation and challenges related to employment may hinder refugees' integration into the local communities and social exclusion. Limited access to stable employment opportunities and potential discrimination could impede their efforts to become active contributors to the social fabric of their host country

GBV: Labor exploitation can be an outcome of genderbased discrimination, and at the same time increases the risk of other GBV forms for by creating economic dependence, isolation, and a lack of legal protections, making them more at risk to sexual harassment, abuse, and trafficking. The fear of losing jobs or the lack of alternative options often forces people to tolerate exploitative conditions, heightening the power imbalance and limiting their ability to seek support. Gender-based violence is a workplace issue, as identified by respondents, manifested in the forms of threats that are structurally rooted, and impacted by systematic limitations.

Capacity

Labor Market Characteristics and Systemic Fight Against the Exploitation of Foreigners

By the end of 2024, the share of foreigners in the total number of workers was 7.3%. Foreign workers came from over 150 countries. Among the foreigners working in Poland in September 2024, 38.7% were employed under civil law contracts and similar agreements. It is estimated that the largest group of foreign workers in Poland were Ukrainian citizens -707.9 thousand people⁵⁵.

At the beginning of 2025, significant initiatives related to the labor market in Poland and foreigners emerged. On February 21, 2025, the Seim passed a law on the conditions for the employment of foreigners. The regulation aims to streamline procedures by abolishing the so-called labor market test and, importantly, tightening penalties for illegal employment and fully digitalizing the procedures. Notably, previously, penalties for violating employment rights of Polish citizens were lower than penalties for foreigners⁵⁶.

The amendment aimed to equalize these disparities. The new regulations are also designed to strengthen the effectiveness of the Border Guard and State Labor Inspectorate controls. Inspections of entities employing foreigners will be able to take place without prior notice. Experts raised certain controversies and doubts about the details of the law during its draft phase.

A discussion was sparked about new conditions for issuing work permits, such as the requirement for a work contract and the failure to address the various forms of contracts under which foreigners are employed and their protections.

Experts from the Lewiatan consortium pointed to the risk of a "gray economy explosion" in foreign employment. As noted, "If these individuals lose their job or leave it, and if they cannot be employed legally with a permit, the chances increase that they will have to accept illegal employment, breaking all possible rules, because legal employment might not be available to them." Experts also pointed out that one of the main reasons for the increasing scale of illegal employment and exploitation is the long procedure for obtaining work permits for foreigners.

Among the well-rated aspects of the law, attempts to introduce integration programs in Labor Offices and create specialized support points for foreign workers in the labor market were mentioned⁵⁸.

In 2025, there was a renewed emphasis on the legal initiative to introduce a definition of forced labor into the Penal Code⁵⁹. The lack of a definition of forced labor hinders its legal classification, limiting the effectiveness of prosecutor and court actions. As a result, judgments in such cases are rare, and criminal proceedings regarding human trafficking for forced labor are few. Without a clear definition, improving law enforcement in this area remains unlikely.



Photo: K. Jonderko

[©]Do 50 tys. zł grzywny za nielegalne zatrudnienie, kontrole bez zapowiedzi. Nowa ustawa o pracy cudzoziemców w Polsce - Infor*p*i

At the beginning of 2025, a series of activities aimed at strengthening the fight against human trafficking in Poland were launched. After years of effort, the National Referral Mechanism (NRM) was introduced⁶⁰. his document was created to establish commitments for cooperation between stakeholders involved in combating human trafficking. It is now an obligatory act regulating the cooperation between institutions involved in combating human trafficking. Furthermore, in February 2025, the Ministry of the Interior and Administration (MSWiA) held the first meeting of a working group tasked with developing a draft law on the prevention and combating of human trafficking, created by the decision of the Chairman of the Interministerial Team for Counteracting Human Trafficking. Work on the law and access to justice for human trafficking survivors was also the subject of the third evaluation cycle and a visit by the Group of Experts on Action Against Trafficking in Human Beings (GRETA) in Poland. The meeting also emphasized the importance of monitoring migration situations, especially in the context of the conflict in Ukraine, which increases the risk of exploiting individuals in difficult situations⁶¹.

Lack of Awareness of Rights and Forms of **Exploitation**

n most of the 15 Key Informant Interviews, respondents pointed to a lack of awareness among refugees about where to seek help in cases of exploitation or abuse at work. However, some focus group participants (13/22) knew where they could turn for assistance, mentioning the Labor Inspection, local NGOs, lawyers, or internal corporate mechanisms for reporting abuse. In 4 cases, respondents also referred to ZUS (Social Insurance Institution).

I would have contacted the labor inspection, I would have gone to court, I would have gone to the local NGO and I would have also contacted the state services. But I was told it's better not to go to court regarding psychological abuse

(Female, 35-49, Warsaw)

OD

I appealed to the director, but it didn't help, they took our salaries to themselves. There was also a case when my Ukrainian colleague was once very sick and was forced to work despite of sickness

(FGD, Female, 55-60, Katowice)

Respondents were also asked what, in their opinion, should be done to prevent these challenges and exploitation situations. The main responses included the need for informational sessions about rights, duties, and the functioning of legal employment. Additionally, they pointed to the need for language learning and addressing situations where language barriers limit understanding of one's situation.

Never tolerate mistreatment, and do not hesitate to assertively say "NO" when necessary, as this can be particularly challenging for Ukrainians

(Female, 60-66, Katowice)

I would advise you to remain open to changing your career path and acquiring new skills. For example, I had no prior experience working in a restaurant, but I learned the necessary skills when given the opportunity. Go for your goals!

(FGD, Female, 60-66, Katowice)

I believe that Ukrainians themselves should value their work, apply for more or less decent jobs, and choose places that suit them. There are different options, I only have two options, but I can compare them. There should be more legal sessions, some kind of informational education, as there are many uninformed people. There are nuances, but people lack basic knowledge, they need to know the laws and so on

(FGD, Female, Warsaw, 35-49)

Access to Support in Labor Market Integration

A number of initiatives related to career counseling, informational sessions, and labor market support are supported both by the third sector — local and international NGOs, as well as UNHCR and other UN agencies — and public institutions. These include activities by Labor Offices, MOPRs (Municipal Social Welfare Centers), social services, Employers' Associations, and County Social Integration Centers⁶². Notably, during interviews with representatives of these institutions, they pointed out the limitations in reaching refugees with their offerings.

In the third sector, IRC, together with local partners, provides career counseling, along with activities such as job matching, CV preparation support, and Polish language courses. Most of the currently functioning local NGOs in Poland also offer support in this area (e.g., Homo Faber, PFM, Caritas, Ukrainian House, Foundation Ukraine, Rights 2 Protection, Migrant Info Point, Multicultural Center, and others). IOM, together with partners and with the participation of representatives of Polish Government Ministries, initiated the Intersectoral Roundtable, aimed at diagnosing the challenges of integrating refugees from Ukraine into the Polish labor market and providing support in this regard. The goal is to develop recommendations and strengthen intersectoral cooperation for more effective long-term socioeconomic integration⁶³.

Moreover, the Skills Alliance, launched by Germany and Ukraine in 2024, is a regional initiative uniting over 50 stakeholders to support Ukraine's recovery. Coordinated by CARE, Tent, and UNICEF, it focuses on job counseling, upskilling, and connecting Ukrainian refugees with safe employment in Poland. While it does not provide direct funding, the alliance fosters cooperation between governments, businesses, and NGOs to promote inclusive employment, training programs, and education opportunities for refugees.

As indicated in the KIIs, despite the number of activities and the broad scope of available help, coordinating these efforts and tailoring them to the individual needs of refugees remains a challenge.

Systemic Solutions and Temporary Protection **System**

One of the challenges identified in accessing the legal labor market and factors that may potentially increase the risk of labor exploitation is the uncertain legal status of refugees. The current temporary protection system is set to expire in a year, in March 2026. The lack of clarity in this regard impacts the ability to secure stable employment and long-term stability, including children's education and access (as indicated by PM data) to stable accommodation. Post-TPD solutions remain a priority on the European agenda and an important element of the discussion during Poland's presidency in the EU Council. Member states, including Poland, have begun working on pathways that enable the transition after temporary protection (proposed CUKR status). However, a major challenge remains the dependency of residence permits on employment.

As experts and refugees, themselves point out, not everyone will be able to meet these requirements, and linking integration solely to participation in the labor market is harmful. Moreover, such solutions risk excluding persons displaced from Ukraine after March 2026, as individuals not subject to "transition from temporary protection". There is a call for a regulated, EU-wide, and coordinated approach towards longterm residence⁶⁴. This is important both in terms of the legality of employment and discrimination due to the uncertain status of these individuals, as well as the situation of the most vulnerable people, whose presence on the labor market is not possible.



Photo: T. Kiptenko

Referring to the Migration Strategy and the proposed solutions concerning foreign nationals' access to the labor market, experts emphasize the need for a unified and efficient system for issuing work permits and strengthening the system of declarations for the employment of foreigners. Regarding labor rights protection, it is crucial to focus on the need for increased oversight of employment agencies. Among some recommendations from experts and local activists is the need to strengthen regular inspections, tighten licensing requirements for agencies, and monitor their activities. Effective strategies to combat illegal employment are also essential, including clearly placing responsibility for this solely on the employer and decriminalizing refugees. There is also a need to strengthen the role of the National Labor Inspectorate. Experts and refugees themselves identify a gap in the safety of workers with refugee or migration experience, who have already been subjected to labor exploitation in the Polish labor market. One of the needs is to expand the scope of emergency assistance. In KIIs, representatives of employment offices also highlighted the need to focus on integration actions for employers and promote cooperation with employers on integration policies. These assumptions are confirmed by, among others, the Migration Consortium⁶⁵.

It is also necessary to consider the specific situation of individuals applying for international protection by lifting the ban on their employment during the first six months of the procedure.

RECOMMENDATIONS

Polish Government and Local Authorities

- Ensuring accessible information for employers on hiring foreign workers and creating an easily available knowledge resource.
- Developing incentive systems for employers to intercultural enhance their competencies, implement non-discriminatory practices, actively engage in private sector inclusion efforts.
- Providing intercultural mediators to help resolve workplace conflicts, with a publicly available list of professionals accessible to employers.
- Designing and implementing a comprehensive anti-discrimination policy, including mechanisms to protect migrant and refugee workers from harassment, sexual harassment, discrimination, violence, and exploitation. These standards should facilitate replication at the local level.
- Mapping resources and needs related to supporting migrants' participation in the local labor market to identify gaps and improve access to employment opportunities.
- Expanding emergency assistance services (temporary housing, food support) for individuals affected by labor exploitation and abuse, with specific consideration of the needs of migrants and refugees.
- Introducing the definition of "Forced Labour" into the Penal Code to strengthen legal protections against exploitation.

Local and international NGOs

- Launching information and awareness including targeted informational campaigns, sessions for refugees—especially those most at risk—about their employment rights and available mechanisms for reporting abuses.
- Monitoring the situation of refugees in the context of exploitation, forced labor, and human trafficking, ensuring an evidence-based approach support interventions and stregthening collaboration with governmental bodies.
- Enhancing the competencies of intercultural mediators and key labor market institutions, including Labor Inspectorates, **Employment** Offices, and other relevant actors responsible for workplace safety and rights protection.
- Conducting informational sessions for migrants and refugees on their rights and obligations in the labor market, as well as the risks associated with exploitation and human trafficking

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