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The Application of the Temporary Protection Directive: Challenges and Good Practices in 2023

Common Template for an EMN Study

Common Template of EMN Study 2023

The Application of the Temporary Protection Directive: Challenges and Good Practices in 2023

NATIONAL CONTRIBUTION FROM ESTONIA*¹

Disclaimer: The following information has been provided primarily for the purpose of contributing to this EMN study. The EMN NCP has provided information that is, to the best of its knowledge, up-to-date, objective and reliable within the context and confines of this study.

Top-line factsheet [max. 1 page]

The top-line factsheet will serve as an overview of the **National Contribution** introducing the study and drawing out key facts and figures from across all sections, with a particular emphasis on elements that will be of relevance to (national) policy-makers. Please add any innovative or visual presentations that can carry through into the synthesis report as possible infographics and visual elements.

Please provide a concise summary of the main findings of Sections 2-4:

The primary objective of this study is to provide an in-depth analysis of the implementation of the Temporary Protection Directive in Estonia. This analysis highlights the encountered challenges and successful practices in the provision of accommodation, employment, integration, healthcare services, education, and social benefits to the beneficiaries of temporary protection within the defined research period, spanning from January 1, 2023, to July 1, 2023. Additionally, it delves into alternative pathways available to beneficiaries of temporary protection seeking to remain in Estonia and on means of addressing issues related to unaccompanied minors and human trafficking.

The findings of this study indicate that, in Estonia, the primary challenges associated with the implementation of the Temporary Protection Directive were most prominent in the first half of 2022. However, by the first half of 2023, these challenges had largely subsided, with officials reporting fewer major issues. The majority of Ukrainian refugees who arrived in Estonia after February 24, 2022 opted to apply for temporary protection status, making them eligible for the associated benefits. While Ukrainian refugees also have the option to pursue a residence permit for purposes such as work, family reunification, study, or entrepreneurship, as well as international protection,

¹ Replace highlighted text with your **Member or Observer Country** name here.

these processes are lengthier, and fewer individuals have chosen these alternatives. Furthermore, Estonia maintains an employment residence permit quota that quickly reaches its limit at the beginning of each year, making it very difficult for Ukrainian refugees to acquire this type of residence permit. The primary challenge faced by the Estonian Police and Border Guard Board (hereinafter also PBGB) during the processing of temporary protection or international protection applications lies in the verification of individuals' backgrounds, especially for those entering through the Russian border, holding dual citizenship (Ukrainian and Russian). It is worth noting that temporary protection status and its benefits remain valid for beneficiaries of temporary protection who travel temporarily to other member states or outside the EU, including Ukraine.

Housing conditions for Ukrainian refugees have shown improvement. Several short-term state-provided housing facilities closing in the spring of 2023 and refugees are increasingly transitioning to permanent accommodations, facilitated by rental subsidies available to beneficiaries of temporary protection. However, access to employment remains impeded by language barriers and disparities in qualifications. The government has made efforts to address these challenges, particularly with regard to language training. Additional government funding has been allocated to address mental health issues and educational gaps, although language barriers and differences in curricula still present challenges.

The primary challenge related to human trafficking in Estonia pertains to the identification of victims of labor exploitation, as well as combatting labour exploitation. Efforts to address these challenges include the integration of human trafficking specialists in case proceedings, providing counseling to unaccompanied minors who are transitioning into adulthood, conducting labor inspections, running awareness campaigns, and implementing mechanisms for reporting suspected cases.

In summary, during the research period, Estonia has shown a steadfast commitment to providing Ukrainian refugees with essential elements such as legal stability, housing, employment opportunities, access to education and integration services, mental health support, and protection against human trafficking, despite encountering certain challenges along the way.

SECTION 1. STATE OF PLAY

In the Synthesis Report, this section will provide an overview of the current situation in terms of number of beneficiaries of temporary in the EMN Member Countries / number of people from Ukraine in EMN Observer Countries.

**Please note that this data will be extracted by the Service Provider from Eurostat and other available harmonised data sources prior to publication and presented in the Study.*

SECTION 2. LEGAL STATUS

Legal Pathways and Transition from Temporary Protection to Other Types and Forms of Residence or Protection

1. Is it possible for beneficiaries of temporary protection residing in your Member State to apply for other types of residence permits/visas/authorization of stay (e.g. a residence permit for work, family,

study or other purposes)? If yes, please specify if this is in addition or as an alternative to temporary protection?

Yes. All Ukrainian refugees, including beneficiaries of temporary protection residing in Estonia have the option to apply for a residence permit, granted for purposes such as work, family reunification, study, entrepreneurship, among others. However, they must meet the respective requirements to qualify for the residence permits. Additionally, in Estonia, there is a quota for residence permits based on labour migration, which fills up quickly, and there are no exceptions made for Ukrainians in this regard. Moreover, refugees from Ukraine have the opportunity to submit an application for international protection. However, for individuals eligible for temporary protection, their applications will not be processed until the period of validity of temporary protection expires.² Ukrainians who do not qualify for temporary protection receive subsidiary protection (if applied), with expedited processing. The residence permits for employment, study, business, family reunification etc. and residence permit granted for beneficiaries of international protection serve as alternatives to temporary protection, as Estonian legislation permits only one legal basis for residing in the country.

It is important to note, that Ukrainian refugees have the option to stay (and work) in Estonia without the necessity of applying for temporary protection, international protection or a residence permit.³ This provision is outlined in § 309(14) of the Alien's Act that says that as of February 24, 2022, due to the military conflict in Ukraine, the following persons who do not have another legal basis for temporary stay, have the legal basis for entry into and temporary stay in Estonia:

- 1) a person with regard to whom temporary protection may be applied in the case of a mass influx of displaced persons pursuant to Council Directive 2001/55/ on minimum standards for granting temporary protection;
- 2) a citizen of Ukraine who stayed in Estonia before 24 February 2022.

This legal basis for temporary stay in Estonia is valid until the temporary protection directive is implemented. The right for a temporary stay in Estonia may be formalized, where necessary, as a long-term visa at the PBGB. Although these individuals have the right to work in Estonia, it's important to note that this is not the same as residence permit for employment purposes.

2. If yes to Q1, are there any special procedures, lowered requirements, dedicated programmes or similar practices in place to assist in obtaining those residence permits/visas/authorization of stay?

All procedures and requirements for applying for residence permits in order to reside in Estonia are identical to those applicable to any other migrants.⁴ The only small difference for Ukrainian refugees lies in the issuance of a temporary residence permit to settle with a spouse. Whereas § 137(2)(3) of the Alien's Act stipulates that a temporary residence permit to settle with a spouse is not granted in cases where the spouse, who is a foreign national, has been granted a temporary residence permit for

² Act on Granting International Protection to Aliens § 69.

³ Source: E-mail interview with an official from the Estonian Police and Border Guard Board (September 22, 2023)

⁴ Ibid.

short-term employment, this provision does not apply to citizens of Ukraine as of February 24, 2022.

The application process for international protection, is notably shorter for Ukrainian refugees in comparison to asylum applicants from other nationalities (approx. 1 month vs. up to 6 months).⁵ This expeditiousness arises from a less rigorous scrutiny of country-of-origin information in the case of Ukraine, in contrast to other countries and the absence of a mandatory interview with the applicant. An interview is conducted only when there are indications that a negative decision on the asylum application may be issued.⁶

3. If yes to Q1, in the event of granting of such residence permits/visas/authorization, what happens with temporary protection and/or the access to rights/facilities/benefits provided under temporary protection?

Should an individual be granted a different type of residence permit, including international protection residence permit, the residence permit granted on the basis of temporary protection status is recognized as invalid and the individual will lose access to rights, facilities, and benefits accompanying temporary protection residence permit.⁷ However, individuals residing in Estonia on the basis of residence permits, including residence permits granted for beneficiaries of international protection, have similar rights.

4. What is the procedure followed by your Member State when a person to whom temporary protection is applied submits an application for international protection? (a) if they already have been registered as a beneficiary of temporary protection and (b) if they have not (yet) been registered as a beneficiary temporary protection.

International protection is available for Ukrainian citizens and residents who either fear persecution within Ukraine or believe that returning to Ukraine could expose them to severe dangers, including the possibility of the death penalty, the use of torture or degrading treatment or punishment, or violence arising from international or internal armed conflicts.

There are no distinctions in the application procedure between individuals who have already been registered as beneficiaries of temporary protection and those who have not yet been registered as such.⁸ As per § 28 and § 69(2) of the Act on Granting International Protection to Aliens an application for international protection of individuals who are eligible for temporary protection shall be accepted for proceedings but the processing thereof shall be suspended. The processing of the application for international protection shall be continued at the request of the applicant three months before the period of validity of temporary protection expires. If the applicant does not desire continuation of the processing of the application for international

⁵ Source: Estonian Police and Border Guard Board's website: <https://www.politsei.ee/et/juhend/info-seoses-ukraina-sojaga/rahvusvahelise-kaitse-taotlemine> (last accessed: October 5, 2023)

⁶ Source: E-mail interview with an official from the Estonian Police and Border Guard Board (September 22, 2023)

⁷ Ibid.

⁸ Source: E-mail interview with an official from the Estonian Police and Border Guard Board (September 22, 2023)

protection or if the individual has left Estonia, the proceedings for international protection shall be terminated.

The procedure differs for individuals who are not eligible for temporary protection (Ukrainians who did not reside in Ukraine before February 24, 2022). To seek international protection, they must submit an application to the PBGB. Notably, the application process for Ukrainian refugees is shorter compared to asylum applicants from other origins.⁹ Firstly, there is no mandatory interview requirement for Ukrainian refugees, except when there are grounds to suspect a potential negative decision on the asylum application. Secondly, the level of scrutiny regarding country-of-origin information is less exhaustive for Ukraine compared to other countries.¹⁰

Applicants who are granted a refugee status receive a residence permit for a duration of three years.¹¹ Applicants who are granted subsidiary protection status receive a residence permit for a duration of one year.

5. Has your Member State encountered any challenges* with persons claiming to be fleeing the war in Ukraine who do not fall under the scope of temporary protection established by the Council Implementing Decision?

**For each challenge please: a) describe for whom it is a challenge; b) indicate why it is mentioned as a challenge, and c) indicate the source / evidence for the challenge.*

Estonia does not apply temporary protection to those Ukrainians who were present in Estonia nor those who did not reside in Ukraine before February 24, 2022. Consequently, these individuals have applied for international protection. Since significantly large number of Ukrainians stayed in Estonia with a short-term employment permit before February 24, 2022, the figures for international protection have increased significantly.

According to the PBGB¹², they have encountered relatively few challenges during the research period regarding individuals who assert that they are fleeing the conflict in Ukraine but do not meet the eligibility criteria for temporary protection. This observation is particularly relevant to Ukrainians who have entered Estonia through the Ukrainian-Polish border. However, in recent times, there has been a noticeable increase in the number of Ukrainian refugees arriving in Estonia through the Russian border. A significant portion of these individuals holds dual citizenship, both Ukrainian and Russian, which presents difficulties in verifying whether they actually lived in Ukraine and comprehending the rationale behind their choice of entry route.

7. If yes to Q5, please explain how such challenges were addressed and/or what are the legal remedies available for such persons.

The PBGB have addressed this challenge by implementing requirements for documentation that substantiates the individual's actual residence in Ukraine.

⁹ Source: Estonian Police and Border Guard Board's website: <https://www.politsei.ee/et/juhend/info-seoses-ukraina-sojaga/rahvusvahelise-kaitse-taotlemine> (last accessed: October 5, 2023)

¹⁰ Source: E-mail interview with an official from the Estonian Police and Border Guard Board (September 22, 2023)

¹¹ Source: Estonian Police and Border Guard Board's website: <https://www.politsei.ee/et/juhend/info-seoses-ukraina-sojaga/rahvusvahelise-kaitse-taotlemine> (last accessed: October 5, 2023)

¹² Ibid.

Additionally, interviews are conducted as part of the border control procedure to provide further verification in this regard.¹³

Traveling to other Member States and outside the EU

8. What, if any, is the mechanism in your Member State to track the movement of the beneficiaries of temporary protection who are travelling to (i) other Member States and (ii) outside the EU?

Despite receiving warnings not to venture into an aggressor state, certain beneficiaries of temporary protection still undertake journeys across the Estonian-Russian border. The PBGB monitors these movements. Travel to other European Union member states is not subject to tracking.¹⁴

9. What happens to temporary protection and the related benefits provided when the person travels outside your Member State to (i) another Member State* and (ii) outside the EU, including to Ukraine?

Beneficiaries of temporary protection can move freely within the Schengen Area for a period of 90 days out of 180 days if they have a valid biometric passport. Temporary protection status and its associated benefits remain intact even when an individual travels outside of Estonia to another EU member state or beyond the borders of the European Union, including Ukraine. Beneficiaries of temporary protection are allowed to temporarily leave Estonia without notifying the authorities, except in cases where the person is accommodated by the state in hotels, or in state-provided apartments. In such cases, the individual must inform their accommodation coordinator of their absence from the accommodation facility if they are away for more than 24 hours. When leaving Estonia permanently, the beneficiary of temporary protection should notify both the local government and the PBGB. In this case, the Estonian residence permit will be revoked.¹⁵

10. Do national authorities in your Member State have knowledge of any challenges* encountered by beneficiaries of temporary protection in re-entering the EU or your Member State specifically when coming back from Ukraine or other Member States? If so, why is it considered a challenge and according to which national authority? How has this been addressed by your Member/Observer State?

**For each challenge please: a) describe for whom it is a challenge; b) indicate why it is mentioned as a challenge, and c) indicate the source / evidence for the challenge.*

During the research period, PBGB has not identified specific challenges for individuals who temporarily travel to other countries and subsequently return to Estonia while retaining their temporary protection status¹⁶. The challenge has primarily arisen with

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Source: Estonian Government Office's website: <https://kriis.ee/julgeolekuulukord-euroopas/info-ukraina-sojapogenikele/eestist-lahkumine> (last accessed: October 5, 2023)

¹⁶ Source: E-mail interview with an official from the Estonian Police and Border Guard Board (September 22, 2023), E-mail questionnaire filled by official from the Estonian Social Insurance Fund (received on September 13, 2023), E-mail questionnaire filled by official from the Estonian Ministry of Economics and Communications (received on September 5, 2023)

individuals who have left Estonia indefinitely or permanently without notifying the Estonian authorities.

However, as per the Estonian Social Insurance Board, a person returning to Estonia may encounter difficulties in securing new accommodation if they have relinquished their previous place of residence. For example, the Estonian Social Insurance Board provides one-time rental assistance for housing, and once this support has been utilized, an individual cannot reapply for it. If the person faces challenges in finding new accommodation, the responsibility falls upon the local government of their last place of residence to offer support and facilitate access to social housing. In the event of such a scenario, each case is handled on an individual basis.

According to the Social Insurance Board, some challenges may arise when individuals return to Estonia after their residence permit has expired, and they wish to reapply for one and access benefits from the Estonian Social Insurance Board. In such instances, the individual must initiate the application process again with PBGB, and the Estonian Social Insurance Board is required to reevaluate and process the benefits for the person.¹⁷

Temporary Protection Registration Platform (TPP)

11. How and to what extent has your country made use of the TPP during the research period?

The Temporary Protection Registration Platform has been consistently utilized by the PBGB throughout the research period to ascertain whether an applicant has previously applied for temporary protection in another country. Furthermore, it is employed to revoke the temporary protection status if an individual has been granted a residence permit in another country.¹⁸

12. Has your country encountered any (i) challenges and (ii) good practices in the use of the TPP? Please elaborate and specify why it is considered a challenge and according to whom this is a challenge/good practice.

The Police and Border Guard Board has encountered certain technical challenges with the system, including frequent operational slowdowns, officials facing difficulties in accessing the platform, and delays in information updates. Nevertheless, it is important to highlight that the platform is generally acknowledged as effective and valuable, as it plays a crucial role in mitigating system misconduct.¹⁹

13. Does your country upload in the Platform the identity of the adult persons accompanying "separated" children arriving from Ukraine, and respectively, of guardians appointed in Ukraine before departure?

No, Estonia does not upload the identities of adults accompanying separated children arriving from Ukraine, nor does it upload the information of guardians appointed for the children in Ukraine. Instead, this information is recorded separately within

¹⁷ Source: E-mail questionnaire filled by official from the Estonian Social Insurance Fund (received on September 13, 2023)

¹⁸ Source: E-mail interview with an official from the Estonian Police and Border Guard Board (September 22, 2023)

¹⁹ Ibid.

Estonia's own system and can be made available to other Member States upon request.²⁰

Assistance to people wishing to go home (back) to Ukraine

14. Does your Member State provide support for the beneficiaries of temporary protection who wish to go home (back) to Ukraine? If so, please elaborate.

No, Estonia does not offer assistance or support to beneficiaries of temporary protection who wish to return to Ukraine.²¹

15. Has your Member State observed any trends in terms of outflows of beneficiaries of temporary protection? If so, please elaborate.

The outflow of beneficiaries of temporary protection has remained stable over the past year.²²

As of July 2, 2023, temporary protection has been applied for by a total of 46,631 individuals and 23,152 individuals have requested an extension of temporary protection. Approximately 200 people are added weekly. Furthermore, 5,343 individuals have chosen to withdraw from temporary protection.²³

Registration

16. Have there been any major legal, policy or practical changes regarding registration of beneficiaries of temporary protection during the research period*? If there were any, please elaborate.

No, there have not been any significant legal, policy or practical changes concerning the registration of beneficiaries of temporary protection throughout the research period.²⁴ However, the procedure for applying for and extending temporary protection changed in September 2023. Temporary protection residence permit requested until September 9, 2023, is valid for one year, after which a new application must be submitted for its extension (extended for one year from the moment of application). Temporary protection residence permit requested from September 10, 2023, onwards is valid until March 2025.²⁵

17. What procedure was used to extend the validity of documentation based on temporary protection after the first year? Please elaborate on the process.

The application for an extension of a residence permit based on temporary protection can be submitted not earlier than 3 months and not later than 1 month before the expiration of the residence permit through the PBGB self-service portal.²⁶ There is a

²⁰ Ibid.

²¹ Ibid.

²² Ibid.

²³ Source: Estonian Police and Border Guard Board's website: <https://www.politsei.ee/et/ajutise-ja-rahvusvahelise-kaitse-taotlejate-arv> (last accessed: October 6, 2023)

²⁴ Source: E-mail interview with an official from the Estonian Police and Border Guard Board (September 22, 2023)

²⁵ Source: Estonian Police and Border Guard Board (2023). Selle nädala lõpus muutub ajutise kaitse taotlemise ning pikendamise kord [At the end of this week, the procedure for applying for and extending temporary protection will change]. Press release, 08.09.2023. <https://www.politsei.ee/et/uudised/selle-naedala-lopus-muutub-ajutise-kaitse-taotlemise-ning-pikendamise-kord-11476> (last accessed: October 5, 2023)

²⁶ Source: Estonian Police and Border Guard Board's website: <https://www.politsei.ee/et/juhend/info-seoses-ukraina-sojaga/ajutise-kaitse-pikendamine> (last accessed: October 5, 2023)

straightforward self-service web platform comprising approximately six fields for extending temporary protection status.²⁷ After submitting the application in the self-service environment, Ukrainian citizens will receive a confirmation email to their provided email address, indicating that their application has been received. In certain instances, such as when there are suspicions about an individual's actual residency in Estonia, individuals are invited for an interview to request supplementary information. Applicants of extension receive an email notification when their extended residence permit card is ready, and they may proceed to the selected PBGB service office to collect it.

In the event that the temporary protection residence permit has already become invalid, the application for an extension of temporary protection can only be submitted in person at the PBGB service office.

To apply for the extension of temporary protection, the individual must have their place of residence registered. Registering a place of residence in Estonia serves as confirmation to the PBGB that the person seeking temporary protection is physically present in Estonia, allowing the state to provide services and support tailored to Estonian residents. Place of residence registration can be completed at the local government. To register a place of residence, a document confirming the use of the premises (such as a lease agreement) or the consent of the premises owner must be provided. If a lease agreement is available, this is sufficient, and additional owner consent is not required.

The extension of a temporary protection residence permit is free of charge for Ukrainian citizens. During the application process, individuals should specify the PBGB service office where they wish to collect their new residence permit card. If there is a need to change the document collection location after submitting the application, a fee will apply.²⁸

Initially, there were apprehensions about functionality of the self-service portal, but it has proven to be effective.²⁹

18. What challenges** did your Member State encounter in the registration process and how were these addressed/planned to be addressed during the research period? Were there any good practices?

**The research period is from 1st January 2023 to 1st July 2023.*

***For each challenge please: a) describe for whom it is a challenge; b) indicate why it is mentioned as a challenge, and c) indicate the source / evidence for the challenge.*

Challenges in the registration process primarily arose for the PBGB during the first half of 2022. However, no challenges were encountered during the research period.³⁰

²⁷ Source: E-mail interview with an official from the Estonian Police and Border Guard Board (September 22, 2023)

²⁸ Source: Estonian Police and Border Guard Board's website: <https://www.politsei.ee/et/juhend/info-seoses-ukraina-sojaga/ajutise-kaitse-pikendamise> (last accessed: October 5, 2023)

²⁹ Source: E-mail interview with an official from the Estonian Police and Border Guard Board (September 22, 2023)

³⁰ Ibid.

SECTION 3. ACCESS TO RIGHTS PROVIDED BY THE TEMPORARY PROTECTION DIRECTIVE

Accommodation

19. Have there been any major legal, policy or practical changes regarding access to accommodation for beneficiaries of temporary protection during the research period*? If there were any, please elaborate. Are there any changes foreseen in the way access to suitable accommodation or the means to obtaining housing is arranged?

In accordance with the Act on Granting International Protection to Aliens, the Social Insurance Board ensures short-term accommodation for individuals directed by the PBGB during their proceedings.³¹ In the first half of 2023, the Social Insurance Board continued with an exception where, in certain cases, other Ukrainian refugees (such as those in transit or those already holding residence permits in Estonia) were allowed to access short-term accommodation provided by the Social Insurance Board. This exception aimed to alleviate the pressure on local municipalities and their obligation to provide immediate assistance.

As a principle, the Social Insurance Board states that when individuals possess residence permits, there are typically no barriers to them pursuing independent living. Therefore, during the research period, the Social Insurance Board focused on supporting the transition from short-term accommodations to more permanent solutions, such as rental apartments or similar arrangements. This support included counseling and empowerment provided by professionals at the short-term accommodation sites to help individuals find permanent residences.

During the research period, there was a gradual decline in the number of Ukrainian refugees arriving in Estonia. Due to the lower number of incoming individuals, the Social Insurance Board closed its four information points (in Jõhvi, Tartu, Pärnu, and Tallinn) and gradually reduced the number of short-term accommodation sites because there was less demand. This was largely because the rental market experienced some improvement, and individuals who wished to stay in Estonia could secure independent housing. This transition was facilitated by a one-time rental subsidy provided by local municipalities (up to 1200 EUR), which was later reimbursed to the local municipality by the Social Insurance Board.

As a result, during the research period, the Social Insurance Board took initial steps to return to what can be termed as normal conditions and services, including the closure of temporary accommodation sites.³²

20. What were the key challenges** in your Member State in providing access to suitable accommodation or the means to obtaining housing to beneficiaries during the research period? How were these challenges addressed/planned to be addressed and are there any good practices?

While the rental market exhibited limited availability in the autumn of 2022, there was a certain resurgence in the first half of 2023. An issue of concern has been the

³¹ Act on Granting International Protection to Aliens, §32 (1)¹

³² Source: E-mail questionnaire filled by official from the Estonian Social Insurance Fund (received on September 13, 2023)

cautiousness of landlords when renting living spaces to Ukrainian refugees.³³ Furthermore, the closure of two short-term accommodation facilities in the spring of 2023 resulted in a substantial number of individuals simultaneously needing assistance in locating suitable housing. Individuals who were required to leave short-term accommodation due to its closure and were unable to secure permanent housing were relocated to other temporary accommodation facilities, which may not have been situated in the same municipality. This created several practical challenges for applicants and beneficiaries for temporary protection, such as issues related to employment, school, and daycare locations, for instance.³⁴

The process of finding housing has been facilitated by both the Social Insurance Board and the private sector, with the establishment of a dedicated web-based accommodation-searching platform at kinnisvara24.ee/ukraini. Additionally, the legally stipulated rental subsidy support measure has played a significant role, as it was not restricted solely to individuals residing in short-term accommodation sites but extended to all Ukrainian refugees who qualified for the subsidy, based on temporary protection or other forms of protection.

In terms of housing, an increasing number of social spaces renovated by local municipalities are becoming available. Furthermore, the government has invested in converting nursing homes or dormitories into permanent residential spaces.³⁵

21. Have these challenges changed since the initial arrival of beneficiaries of temporary protection in 2022?

The issues in 2022 were primarily of a technical nature, including concerns related to resources and, during the initial days (before the implementation of the Temporary Protection Directive), legal matters. In the context of mass migration, the plans for emergency response, coordinated by the PBGB and involving the participation of the Social Insurance Board, were primarily focused on irregular migration. Consequently, the procedures outlined alternative courses of action from those related to mass legal migration.

A significant challenge in 2022 emerged from the sudden influx of a large number of individuals, which had not been anticipated during the planning phase due to Estonia's geographical distance from Ukraine and the initial assumption that those arriving in Estonia would primarily consist of close associates and acquaintances of the local diaspora. Thus, it was believed that there would be limited need for support from the public sector. However, Estonia also received individuals with a different profile.³⁶

**The research period is from 1st January 2023 to 1st July 2023.*

³³ Ibid.

³⁴ Estonian Public Broadcasting (2023). Abistajad ja linn ei mõista SKA otsust põgenikud keset kooliaastat koduta jätta [Aid givers and the city do not understand Social Insurance Board's decision to leave refugees homeless in the middle of the school year]. 23.03.2023. <https://www.err.ee/1608924032/abistajad-ja-linn-ei-moista-ska-otsust-pogenikud-keset-kooliaastat-koduta-jatta> (last accessed: 5 October, 2023)

³⁵ Source: E-mail questionnaire filled by official from the Estonian Social Insurance Fund (received on September 13, 2023)

³⁶ Ibid.

****For each challenge or good practice please: a) describe for whom it is a challenge/good practice; b) indicate why it is mentioned as a challenge/good practice, and c) indicate the source / evidence for the challenge/good practice**

Labour Market

**Please note that an EMN Inform is being developed on the labour market integration of beneficiaries of temporary protection which will explore this topic in further detail and complement the information collected*

22. Have there been any major legal, policy or practical changes regarding access to the labour market for beneficiaries of temporary protection during the research period* (e.g. concerning the conditions and procedures for (self-)employment such as labour market tests, work permits, access to regulated professions, etc.)? If there were any, please elaborate.

During the research period, there were no significant legal, policy, or practical changes regarding access to the labour market for beneficiaries of temporary protection.³⁷

23. What were the key challenges** that your Member State encountered in (i) providing access to (self-)employment during the research period (e.g. in connection with the issuance of work permits, access to regulated professions and/or other conditions) and (ii) providing measures facilitating employment and labour market activation, such as vocational training, language courses, training or integration assistance for adult beneficiaries of temporary protection?

In general, Ukrainian war refugees have performed well in the Estonian labour market. As of May 2023, 44% of beneficiaries of temporary protection aged 20-64 were employed, a notably higher figure than the European Union average of 30%. Moreover, the proportion of employed refugees is increasing, and their employment relationships are stable, indicating their strong integration into the Estonian labour market.

Nonetheless, one of the primary challenges faced by Estonian authorities³⁸ in facilitating employment opportunities for Ukrainian refugees during the research period has been the discrepancy between their higher levels of education and the nature of available job opportunities, which often do not align with their qualifications. One of the reasons for this is the challenge of recognizing an individual's qualifications to work in regulated professions, such as healthcare professionals or educators. This issue has been further exacerbated by limited language proficiency and limited childcare options. Consequently, a significant segment of Ukrainian refugees has found employment in lower-skilled positions. While many of them held positions related to education, commerce, or healthcare in Ukraine, their occupations in Estonia often tend to be manual labour, such as cleaning or jobs in manufacturing.³⁹

³⁷ Source: E-mail questionnaire filled by official from the Estonian Ministry of Economics and Communications (received on September 5, 2023)

³⁸ Estonian Ministry Economic Affairs and Communication, Estonian Unemployment Insurance Fund

³⁹ Source: Estonian Ministry of Social Affairs (2023). Ukraina sõjapõgenikud on tööturul hästi hakkama saanud [Ukrainian refugee have performed well in the labour market]. Press release 15.05.2023. <https://www.sm.ee/uudised/ukraina-sojapogenikud-tooturul-hasti-hakkama-saanud> (last accessed October 5, 2023)

Beneficiaries of temporary protection are required to complete a basic Estonian language course (unless the individual is acquiring basic, secondary or higher education in the Estonian language).⁴⁰ Unfortunately, not all Ukrainian refugees can access this course, as there is a shortage of training facilities, teachers, and funding. In many regions, learning Estonian is only possible through independent online courses.^{41 42}

Furthermore, the completion of an Estonian language course at the A1 level frequently does not equip individuals with the language proficiency required to secure employment. At the same time, there is a shortage of advanced-level language courses.⁴³

24. How were these challenges addressed/planned to be addressed and are there any good practices in responding to the challenges?

Efforts are underway to increase training capacity, including the training of new teachers. In May 2023, the Estonian government allocated €4.7 million in funding for the provision of Estonian language courses and other supporting activities.⁴⁴ In cases where proficiency in the Estonian language is necessary for gaining employment, individuals can also access more advanced Estonian language training through the Estonian Unemployment Insurance Fund.⁴⁵ Therefore, additional funding has also been allocated from EU REACT resources to offer Estonian language instruction as part of employment services in 2023.⁴⁶

In order to incentivize beneficiaries of international and temporary protection to complete the initiated language training, the Ministry of Culture submitted a draft regulation for coordination in June 2023. This regulation outlines the conditions for Estonian language instruction for beneficiaries of international and temporary protection, including provisions for compensation to the state in the event of course

⁴⁰ Act on Granting International Protection to Aliens § 75 (4¹)

⁴¹ Source: Estonian Public Broadcasting (2023). Ukraina põgenike voog Eestisse on aeglustunud, aga keeleõppe väljakutse püsib [The inflow of Ukrainian refugees to Estonia has slowed down, but the challenge of language learning remains]. 12.09.2023. <https://www.err.ee/1609098212/ukraina-pogenike-voog-eestisse-on-aeglustunud-aga-keeleoppe-valjakutse-pusib> (last accessed: October 5, 2023)

⁴² Source: Pärnu Postimees (2023). Sõjapõgenikel tuleb eesti keelt õppida, kuid õpetajaid ja raha napib. [Refugees have to learn Estonian, but there is a lack of teachers and funding]. 27.02.2023. <https://parnu.postimees.ee/7721007/sojapogenikel-tuleb-eesti-keelt-oppida-kuid-opetajaid-ja-raha-napib> (last accessed: October 5, 2023)

⁴³ Integration Foundation (2023). Newsletter, 25.01.2023. <https://integratsioon.ee/uudiskiri-jaanuar-2023> (last accessed: October 5, 2023)

⁴⁴ Source: Postimees (2023). Valitsus eraldas reservist 4,7 miljonit Ukraina põgenike keeleõppeks [The government allocated 4.7 million from the reserve for language training of Ukrainian refugees]. 17.05.2023. <https://haridus.postimees.ee/7776286/valitsus-eraldas-reservist-4-7-miljonit-ukraina-pogenike-keeleoppeks> (last accessed: October 5, 2023)

⁴⁵ Source: Estonian Ministry of Social Affairs (2023). Ukraina sõjapõgenikud on tööturul hästi hakkama saanud [Ukrainian refugee have performed well in the labour market]. Press release 15.05.2023. <https://www.sm.ee/uudised/ukraina-sojapogenikud-tooturul-hasti-hakkama-saanud> (last accessed October 5, 2023)

⁴⁶ Source: E-mail questionnaire filled by official from the Estonian Ministry of Economics and Communications (received on September 5, 2023)

discontinuation. This plan, however, has received significant criticism and has not been enforced.⁴⁷

**The research period is from 1st January 2023 to 1st July 2023.*

***For each challenge or good practice please: a) describe for whom it is a challenge/good practice; b) indicate why it is mentioned as a challenge/good practice, and c) indicate the source / evidence for the challenge/good practice*

Healthcare

25. Have there been any major legal, policy or practical changes regarding access to healthcare (including mental health support) for beneficiaries of temporary protection during the research period*? If there were any, please elaborate.

There have not been any major legal, policy or practical changes regarding access to healthcare for beneficiaries of temporary protection during the research period.⁴⁸

26. What were the key challenges** in your Member State in providing access to medical care to beneficiaries of temporary protection during the research period?

Since generally the same conditions apply to Ukrainian refugees as to Estonian citizens in access to medical care, the challenges are similar as well. For example, it has been difficult to get registered with a family doctor or mental health doctor or specialist.⁴⁹

27. How were these challenges addressed/planned to be addressed and are there any good practices in responding to the challenges?

As a transitional measure, general practitioner (family doctor) services have been provided to refugees in addition to the regular list-based system, also through family doctor centres and through private partners of Health Insurance Fund.

In addition, in May 2023, the Ministry of Social Affairs allocated some funding to support the mental health of Ukrainian refugees and facilitate the integration of refugee communities.⁵⁰

Organizations and institutions that offer or wish to provide mental health services or community support to refugees are eligible to apply for this support. The mental health service support aims to provide assistance in the native language to those in need, alleviating the negative impact of trauma, crisis, or psychiatric disorders. The services offered are intended to support the coping mechanisms of war refugees and their families, helping to prevent the development of severe psychiatric disorders that would ultimately place an additional burden on the healthcare system.

⁴⁷ Source: Estonian Public Broadcasting (2023). Määruse järgi peaks keeleõppe katkestanud sõjapõgenikud selle hüvitama [According to the regulation, refugees who have interrupted their language studies should compensate for it]. <https://www.err.ee/1609020632/maaruse-jargi-peaks-keeleoppe-katkestanud-sojapogenikud-selle-huvitama> (last accessed: October 5, 2023)

⁴⁸ Source: E-mail questionnaire filled by official from the Estonian Ministry of Social Affairs (received on October 5, 2023)

⁴⁹ Ibid.

⁵⁰ Regulation RT I, 02.05.2023, 1 by the Minister of Social Protection "Sõjapõgenike vaimse tervise teenuste ja kogukondliku toe toetus aastal 2023" [Support for mental health services and community support for war refugees in 2023].

The community support funding is allocated to promote the integration of refugees into communities and to support their well-being. Refugees who have arrived in Estonia may not yet be familiar with Estonian society and its legal system. Their access to necessary services is hindered by language barriers, as well as legal, cultural obstacles, and a lack of awareness. Additionally, newly arrived individuals in Estonia may lack a supportive network and may require external assistance in their daily activities.

**The research period is from 1st January 2023 to 1st July 2023.*

***For each challenge or good practice please: a) describe for whom it is a challenge/good practice; b) indicate why it is mentioned as a challenge/good practice, and c) indicate the source / evidence for the challenge/good practice*

Education

28. Have there been any major legal, policy or practical changes regarding access to education for beneficiaries of temporary protection during the research period*? If there were any, please elaborate.

There have been no significant legal, policy, or practical changes regarding access to education for beneficiaries of temporary protection during the research period.⁵¹

29. What are the key challenges** and barriers in your Member State during the research period in providing access to primary and secondary education to persons under 18 years old (including measures facilitating the possibility to follow the online Ukrainian curricula)?

The primary challenge during the research period included facilitating access to primary and secondary education for children under the age of 18 who were beneficiaries of temporary protection. This was due to the limited number of available school placements mid-academic year in the largest municipality (Tallinn).⁵²

The challenges also included language barriers and teaching in bilingual classrooms, significant differences between the Estonian and Ukrainian curricula, and providing support to Ukrainian students. This has resulted in additional workload for teachers and, consequently, a shortage of teachers, assistant teachers, and support specialists. Furthermore, the complexity is compounded by the fact that many Ukrainian parents want their children to simultaneously attend both an Estonian school and participate in Ukrainian distance learning. This places a double burden on the children.⁵³

30. What steps have been taken to address these challenges, and are there any good practices in responding to the challenges?

To address the issue of a shortage of school placements in the middle of the school year in Tallinn, the City Government provided educational opportunities through the adaptation program. Additionally, for individuals under 18 years old who had received temporary protection and had completed their primary education and compulsory schooling, Estonian vocational education institutions kept open study programs to enable Ukrainian youth to continue their education. Furthermore, a vocational school,

⁵¹ Source: E-mail questionnaire filled by official from the Estonian Ministry of Education and Science (received on October 5, 2023)

⁵² Ibid.

⁵³ Source: Foresight Centre (2023). Ukraina lapsed Eesti hariduses [Ukrainian children in Estonian education system]. <https://arenguseire.ee/raportid/ukraina-lapsed-eesti-hariduses/> (last accessed: October 5, 2023)

the Tartu Art School in Tallinn, created an additional 30 study placements within the vocational education program, and these were quickly occupied.⁵⁴

In order to provide support for recently arrived children and young people from Ukraine to continue their education, the Ministry of Education and Research has allocated additional funding to local municipalities and private general education schools and kindergartens in March and in May 2023. This support is provided at a rate of 465 euros per child attending a kindergarten or nursery and 506 euros per month per student in general education schools, with the funds transferred to the school or kindergarten operator. The funding can be used for the following purposes:

- establishing primary and general education facilities (including the remuneration of teachers and assistant teachers, procurement of educational materials and technological resources, and organizing study trips);
- providing additional basic-level Estonian language instruction;
- Organizing educational support services (interpreters, speech therapists, psychologists, etc.);
- arranging support services for education (e.g., student transportation, catering);
- offering extracurricular activities, hobby education, or youth work.^{55 56}

The workload of teachers is alleviated by Ukrainian education professionals. In addition to Ukrainian refugee students, many educational institutions have also welcomed employees from Ukraine who can help alleviate the additional workload resulting from Ukrainian children. They assist by translating educational materials, teaching classes, acting as mentors to students, and more.⁵⁷

**The research period is from 1st January 2023 to 1st July 2023.*

***For each challenge or good practice please: a) describe for whom it is a challenge/good practice; b) indicate why it is mentioned as a challenge/good practice, and c) indicate the source / evidence for the challenge/good practice*

Social Assistance/welfare

**Please note that an EMN Inform is being developed on the labour market integration of beneficiaries of temporary protection which will explore the transition from social*

⁵⁴ Source: E-mail questionnaire filled by official from the Estonian Ministry of Education and Science (received on October 5, 2023)

⁵⁵ Source: Estonian Ministry of Education and Science (2023). Haridusasutuste pidajad saavad täiendavat toetust Ukrainast saabunud laste abistamiseks [Educational institutions receive additional support to help children who have arrived from Ukraine]. Press release 05.05.2023. <https://www.hm.ee/uudised/haridusasutuste-pidajad-saavad-taiendavat-toetust-ukrainast-saabunud-laste-abistamiseks> (last accessed: October 5, 2023)

⁵⁶ Source: Estonian Ministry of Education and Science (2023). Haridus- ja Teadusministeerium eraldab haridusasutuste pidajatele täiendavat toetust, et tagada Ukrainast saabunud laste haridustee jätkumine [The Ministry of Education and Research allocates additional support to educational institutions in order to ensure the continuation of the educational path of children who arrived from Ukraine]. Press release 03.03.2023. <https://www.hm.ee/uudised/haridus-ja-teadusministeerium-eraldab-haridusasutuste-pidajatele-taiendavat-toetust-et> (last accessed: October 5, 2023)

⁵⁷ Source: Foresight Centre (2023). Ukraina lapsed Eesti hariduses [Ukrainian children in Estonian education system]. <https://arenguseire.ee/raportid/ukraina-lapsed-eesti-hariduses/> (last accessed: October 5, 2023)

assistance/welfare into employment and financial independence in further detail and complement the information collected

31. Have there been any major legal, policy or practical changes regarding access to social assistance for beneficiaries of temporary protection during the research period*? If there were any, please elaborate.

During the research period, there have been no changes in the support and benefits provided by the state. However, the Ministry of Social Affairs has allocated additional funding from the European Social Fund (ESF) to local municipalities through open calls. This funding is directed towards municipalities facing challenges in providing daily support to individuals residing within their territories. The program began in late 2022 and will continue until October 31, 2023.⁵⁸

32. What are the key challenges** and barriers in your Member State in providing access to social assistance/welfare for beneficiaries of temporary protection during the research period?

Ukrainian refugees who have obtained a residence permit under the Temporary Protection Directive are entitled to the same rights and obligations as permanent residents in Estonia. Therefore, the challenges faced in providing them with support and benefits do not differ from those encountered in ensuring the availability of assistance to permanent residents.⁵⁹

33. How were these challenges addressed/planned to be addressed and are there any good practices in responding to the challenges?

There are no challenges or notable best practices specific to the beneficiaries of temporary protection that can be reported.

**The research period is from 1st January 2023 to 1st July 2023.*

***For each challenge or good practice please: a) describe for whom it is a challenge/good practice; b) indicate why it is mentioned as a challenge/good practice, and c) indicate the source / evidence for the challenge/good practice*

SECTION 4. VULNERABLE GROUPS

Support for vulnerable groups

34. What are the key challenges** in your Member State in (i) identifying vulnerable persons under the TPD and (ii) providing them the necessary assistance and support during the research period*?

A significant challenge arises in the life arrangements of 17-year-old youngsters who fall outside the conventional target group for substitute care. What complicates the situation further is that these unaccompanied youths typically do not require traditional substitute care; they are nearly adults accustomed to handling things relatively independently in their home country. For most of them, the goal is to secure employment and accommodation, and to start living independently. By directing a

⁵⁸ Source: E-mail questionnaire filled by official from the Estonian Social Insurance Fund (received on September 13, 2023)

⁵⁹ Ibid.

young person into substitute care services, as required by law, may artificially increase their need for assistance.⁶⁰

The preparation for independent living requires a tailored approach since these individuals lack the skills and knowledge needed to enter the labor market, even though their goal is employment. They also have limited understanding of Estonian labor laws. Finding accommodation upon reaching adulthood is complicated due to the absence of income, and landlords tend to approach young individuals with caution. The language barrier further hinders their pursuit of education, such as vocational training.

35. How were these challenges addressed/planned to be addressed and are there any good practices in responding to the challenges?

The challenges are addressed on a case-by-case basis, taking into account, if possible, the young person's wishes. In instances where the person does not have friends or relatives to live with or lacks the necessary authorization from their parents, officials from the Social Insurance Board contact the local government, which represents them in obtaining temporary protection. Simultaneously, efforts are initiated to find a substitute care service (foster home etc.).

**The research period is from 1st January 2023 to 1st July 2023.*

***For each challenge or good practice please: a) describe for whom it is a challenge/good practice; b) indicate why it is mentioned as a challenge/good practice, and c) indicate the source / evidence for the challenge/good practice*

Support for UAMs, separated children, and children accompanied by UA guardians

36. What are the key challenges** in your Member State in providing assistance to UAMs, separated children, and children accompanied by a guardian appointed in Ukraine? (e.g. recognition of guardianship, appointment of accompanying adult as a temporary guardian, accommodation and care conditions for individual children accompanied by guardians; monitoring the situation, etc)

Estonia recognizes guardianship determined in Ukraine. Courts have faced challenges in cases involving minors who have arrived without a notarized authorization holder. The dilemma is whether to acknowledge the authorization without notarization (parental consent for the organization of their child's life) or initiate the guardianship appointment process in Estonia.

Children under guardianship enjoy the same rights as Estonian children, and the responsibility for their upbringing primarily rests with the legal guardian. Necessary support can be obtained from the local municipality, but providing suitable accommodation is a challenge that requires outsourcing from the rental market.⁶¹

37. Does your Member State host groups of children evacuated from Ukrainian institutions? If so, how many children were hosted during the research period? Please describe the type of accommodation and care that are offered to this category of children.

⁶⁰ Source: E-mail questionnaire filled by official from the Estonian Social Insurance Fund (received on September 4, 2023)

⁶¹ Ibid.

No groups of evacuated children from institutions have arrived in Estonia.⁶²

***For each challenge or good practice please: a) describe for whom it is a challenge/good practice; b) indicate why it is mentioned as a challenge/good practice, and c) indicate the source / evidence for the challenge/good practice*

Prevention of trafficking in human beings

38. What particular steps were taken in your Member State to protect people fleeing Ukraine and, especially, UAMS, from trafficking in human beings during the research period*?

The majority of measures to prevent human trafficking among refugees escaping Ukraine were already established by 2022.⁶³ However, during the research period, additional steps were taken to protect individuals fleeing Ukraine from human trafficking.

First, as a measure to mitigate the risk of oversight, specialists specializing in human trafficking issues, including those affiliated with the Social Insurance Board, were integrated into the case officers' network responsible for handling cases, particularly those involving unaccompanied minors.

Second, unaccompanied minors who reach adulthood are assigned support persons to assist them in various matters, including the formulation of official contracts and the pursuit of employment opportunities, which may necessitate the use of services provided by the Unemployment Insurance Fund. One objective of this measure is to prevent them from becoming victims of labor exploitation.⁶⁴

Finally, a new Victim Support Act was approved by Parliament on December 14, 2022, and entered into force on April 1, 2023. This act regulates the organization of victim support, the provision of victim support services, state compensation, and includes provisions related to victims of human trafficking.

39. What are the key challenges in your Member State in relation to trafficking in human beings?

One of the key challenges related to human trafficking in Estonia is the identification of victims, particularly in the case of foreign victims trafficked for the purpose of labor exploitation. As a result, the number of formally identified victims does not accurately represent the true extent of human trafficking in Estonia.

For instance, among the formally identified victims of trafficking, the primary form of exploitation has been trafficking for the purpose of sexual exploitation. However, among presumed victims of trafficking, labor exploitation has been more prevalent. These presumed victims have mostly been men from Ukraine and Poland, employed

⁶² Ibid.

⁶³ Source: E-mail questionnaire filled by official from the Estonian Ministry of Justice (received on August 28, 2023)

⁶⁴ Source: E-mail questionnaire filled by official from the Estonian Social Insurance Fund (received on September 4, 2023)

primarily in the construction and manufacturing sectors, as well as in the cleaning industry.⁶⁵

40. How were these challenges addressed/planned to be addressed and are there any good practices in responding to the challenges?

From a legislative standpoint, the Estonian authorities have addressed the issue of trafficking in human beings through the Violence Prevention Agreement 2021-2025, which was adopted in July 2021. This agreement includes a dedicated chapter titled the "Action Plan" specifically focused on preventing trafficking in human beings. The Action Plan underscores the importance of enhancing the mechanism for identifying trafficking in human beings, particularly in cases related to labor exploitation, and emphasizes the need to raise awareness among businesses and workers regarding this issue.

The Action Plan outlines several key activities, including:

- 1) Increasing proactive labor inspections based on risk analysis and data exchange to combat illegal employment of migrants in Estonia;
- 2) Strengthening international legal cooperation with countries of origin;
- 3) Enhancing coordination among all relevant stakeholders at both the national and local levels to improve prevention, detection, and investigation efforts related to trafficking in human beings.

Furthermore, the Action Plan encompasses legislative changes, the development of training programs, and initiatives aimed at raising awareness about trafficking in human beings.

In practice, to combat trafficking among refugees, Estonia's Labor Inspectorate expanded its team, adding ten inspectors and five lawyers. They conducted independent workplace assessments for Ukrainian refugee employees and offered free legal assistance for work-related issues like unpaid wages. They also maintained a dedicated phone line and website for worker rights, now available in Estonian, English, and Russian, with a focus on preventing labor trafficking.

The Labor Inspectorate ran a media campaign to raise awareness of labor trafficking, particularly among vulnerable Ukrainian refugees. The government created informational materials explaining trafficking risks and available support services.

The Estonian Social Insurance Board, in partnership with PBGB, provided crisis counseling and ongoing assistance to refugees and volunteers. They also trained officials and volunteers to identify trafficking indicators and offered informative sessions for employers on foreign nationals' employment rights.

A dedicated email for reporting trafficking cases was established in 2022, alongside a government-run anti-trafficking hotline available in Estonian, Russian, and English.

⁶⁵ GRETA (2023). Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Estonia. 07.06.2023. <https://rm.coe.int/greta-evaluation-report-on-estonia-3rd-evaluation-round-greta-2023-07-/1680ab81c1> (last accessed: October 5, 2023)

Efforts to reduce demand for commercial sex included a behavior-changing program and related research. The government funded a media campaign against sexual violence and for reducing demand for commercial sex.

Parliament amended the Aliens Act in 2022, simplifying foreign nationals' employment, with a specific focus on streamlining refugee employment. This aimed to prevent misuse of employment rules, ensure proper taxation, and guarantee migrant workers' legal salaries. Recruitment agencies were banned from charging job seekers fees, and the Labor Inspectorate monitored their compliance.

To reduce undocumented foreign labor, improve payment practices, and enhance safety, amendments introduced an electronic registration system for construction workers, effective from October 2023.⁶⁶

**The research period is from 1st January 2023 to 1st July 2023.*

SECTION 5: CONCLUSIONS

41. Please synthesize the main and most important findings of your national report by drawing conclusions from your responses, emphasizing on how challenges were addressed and main lessons learnt during the research period in terms of the key research for this Study, including:

- Legal pathways beyond TPD and transition from temporary protection to other types and forms of residence
- Traveling of beneficiaries of temporary protection
- Assistance to people wishing to go home (back) to Ukraine
- Registration
- Access to rights provided under the TPD, including accommodation, labour market, healthcare, education, social assistance and support for vulnerable groups

In Estonia, Ukrainian refugees who have temporary protection status have the alternative option to apply for a residence permit for purposes such as work, family reunification, study, or entrepreneurship. Because these residence permits entail various qualifying criteria, the application process is lengthy, and Estonia has a quota for residence permits based on labour migration, the application for these residence permits is not very common. Ukrainian refugees also have the option to apply for international protection, which grants a residence permit valid for one year when obtaining the status of subsidiary protection and three years when obtaining the status of a refugee. Additionally, in accordance with the Alien's Act, individuals who were already in Estonia before February 24, 2022, and thus were not eligible for temporary protection, were allowed to remain and work in Estonia without the need for a residence permit.

The application process for international protection is notably expedited for Ukrainian refugees, with the entire process taking approximately one month, whereas applicants from other countries may face processing times of up to six months. This efficiency is attributed to a less rigorous examination of country-of-origin information for

⁶⁶ Ibid.

Ukrainians and the absence of mandatory interviews unless there are indications that a negative decision might be issued.

However, some challenges have emerged regarding the verification of backgrounds for Ukrainian refugees arriving via the Russian border, especially those holding dual citizenship (Ukrainian and Russian). Ensuring that these individuals genuinely resided in Ukraine and understanding their choice of entry route has posed some difficulties. To address this challenge, authorities have implemented requirements for documentation substantiating their residence in Ukraine, and interviews are conducted when necessary for further verification.

Temporary protection status and its associated benefits remain intact even when beneficiaries travel outside Estonia to other European Union member states or beyond the EU borders, including Ukraine. This flexibility allows them to temporarily leave Estonia without notifying the authorities, except in specific cases where they are accommodated by the state. When leaving Estonia permanently, the beneficiary of temporary protection should notify both the local government and the PBGB. In this case, the Estonian residence permit will be revoked.

The housing situation for Ukrainian refugees has improved over time, thanks to support from local municipalities and the government. Rental subsidies and the conversion of facilities like nursing homes into residential spaces have helped provide more stable housing solutions for refugees.

In general, Ukrainian war refugees have performed well in the Estonian labour market. However, access to employment remains a challenge for many Ukrainian refugees due to language barriers and differences in qualifications. While they may have higher education, limited language skills often lead them to work in lower-skilled positions, such as cleaning or manufacturing. The completion of Estonian language courses is essential for integration, but the availability of such courses remains limited in some regions, and funding constraints exist.

Efforts to address these language barriers include increasing training capacity, including teacher training, and allocating funding for Estonian language courses. Despite these efforts, language proficiency requirements for employment can still pose challenges for refugees.

Mental health support for Ukrainian refugees has received attention from the Ministry of Social Affairs, which allocated funding to support their mental well-being and integration into Estonian society. Organizations offering mental health services or community support for war refugees can apply for this support, aiming to alleviate the impact of trauma and psychiatric disorders.

Education for Ukrainian refugee children is also a priority, with additional funding allocated to local municipalities and schools. This funding covers various purposes, including establishing educational facilities, providing language instruction, support services, extracurricular activities, and more. However, challenges such as language barriers and differences between curricula continue to be addressed on a case-by-case basis.

In terms of preventing human trafficking among refugees, Estonia has taken several measures during the research period, including integrating specialists in human

trafficking issues into the network responsible for handling cases of vulnerable groups. Support persons are assigned to unaccompanied minors upon reaching adulthood to prevent labour exploitation. Additionally, a new Victim Support Act aims to provide comprehensive assistance to victims of human trafficking.

The government's efforts to combat human trafficking also include labor inspections, awareness campaigns, and a dedicated email address and hotline for reporting suspected cases. Strategies to reduce the demand for commercial sex activities are also being pursued, targeting consumers and raising awareness about sexual violence.

In summary, Estonia during the research period has taken multiple measures to provide Ukrainian refugees with stable legal status, access to housing, employment, education, mental health support, and protection against human trafficking. While challenges persist, ongoing efforts aim to improve the integration and well-being of Ukrainian refugees in the country.