

Preparing for the Unpredictable: Ensuring the Protection and Inclusion of Refugees from Ukraine in Romania and Moldova

Devon Cone & Daphne Panayotatos

October 2022

This report is under embargo until 2:00 am ET on Thursday, October 6.

Executive Summary

Since February 24, 2022, Russia's military invasion of Ukraine has caused widespread terror, destruction, and displacement. As of late September 2022, there were more than [7.5 million](#) refugees from Ukraine living in countries across Europe, almost [90 percent](#) of whom are women and children.¹ Romania and Moldova were hosting about [80,498](#) and [92,443](#) people respectively.

The extraordinary humanitarian response in both countries has been driven by volunteers and local NGOs, with the support of national authorities, the European Union (EU), and the United Nations (UN). Significant financial support for people displaced in and from Ukraine has also come from outside the region, especially the United States. The EU, its Member States, and Moldova have facilitated refugees' access to safety and rights by sharing responsibility for the response and making critical policy decisions, coordinated under the framework of a new Solidarity Platform. Most notably, the EU's unprecedented activation of the Temporary Protection Directive established an immediate right to a minimum level of protection for refugees from Ukraine across the bloc. As war and displacement become protracted, the focus of the response must shift from providing emergency humanitarian aid to promoting refugees' integration. Ensuring refugees can exercise the broad range of rights accorded to them is key.

However, both Romania and Moldova require significant financial and technical support to immediately welcome refugees from Ukraine and accommodate them in the mid- to longer-term. Already, various obstacles hinder refugees' ability to exercise their rights

and to access services for which they are eligible. Meanwhile, Ukrainians eager to return home are hesitating to make plans in their host countries given the uncertainty about the war's trajectory. This, together with challenges of collecting information about refugees' needs and coordinating among diverse actors, complicates planning for all stakeholders, especially for the long-term. Furthermore, as Romanian and Moldovan citizens grow increasingly concerned about the war's enduring implications on their own economies, the initial welcome the Ukrainian refugees received is wearing thin.

To date, commitments from Romanian, Moldovan, and EU officials to realize refugees' inclusion remain clearer in rhetoric than in action. National, international, and non-governmental actors in Romania and Moldova must adapt the response to sustain a generous welcome and effectively support refugees from Ukraine for as long as they need protection.

Recommendations

The governments of Romania and Moldova should:

- **Ensure legal access to protection for refugees from Ukraine for as long as they remain unable to safely return to their country of origin.** The Romanian government should extend temporary protection for the maximum three years allowed under EU law. The Moldovan government should apply its legal provision to grant refugees from Ukraine temporary protection. Both should increase asylum authorities' capacity to manage registration for temporary protection and facilitate access to asylum for those who request it.
- **Work with partners to develop actionable national integration strategies and invest the necessary resources to begin immediately implementing them.** A coherent, long-term vision from governments will signal commitment to welcoming refugees and improve all stakeholders' financial and operational planning and coordination.
- **Ensure refugees' access to safe and dignified accommodation.** For refugees hosted by local individuals, systematize registration, vetting, and monitoring of hosts, as well as reporting of and response to exploitation or gender-based violence by hosts. To safeguard the supply of independent housing alternatives, enforce legislation that prohibits property owners from discriminating against renters because of their nationality or from price gouging. Right-size capacity in collective accommodation sites, retain contingency plans to scale if necessary, and ensure adequate reception conditions.

- **Expand cash assistance programs, improve access to childcare, and facilitate recognition of professional and educational degrees from Ukraine.** Expand cash assistance programs for refugees to facilitate their transitions and help them meet basic needs with greater autonomy while benefiting local economies. Facilitate access to childcare and recognition of degrees and other qualifications to help refugees, especially single mothers, secure adequate employment.
- **Enable the full participation of refugee children in schools.** Remove bureaucratic and legal barriers to enrollment, provide language courses, train teachers, introduce psychosocial support services, improve accessibility for students with disabilities, and expand capacity in facilities and school feeding programs.
- **Continue voicing solidarity with refugees from Ukraine while ensuring that programs serving refugees are designed and funded to also benefit host communities.** At all levels of government, demonstrating political support, promoting social cohesion, and responding to local populations' needs can mitigate risks of "empathy fatigue" and rising xenophobia and discrimination. National governments should increase financial and technical support to local authorities taking concrete steps to welcome refugees.
- **Improve transparency around funding.** Governments should regularly report amounts spent from domestic budgets; amounts requested, received, and disbursed from the EU and other donors; and the distribution and use of that funding. Increased transparency builds trust among stakeholders and informs planning for more efficient and effective aid delivery.

The European Commission should:

- **Provide additional fresh funding to mitigate potential negative repercussions of repurposing existing EU funds away from other priorities.** As a leading humanitarian actor, the EU must ensure its response to Ukrainian refugees does not come at the expense of other populations facing humanitarian crises. At the national level, EU funding should support programming that benefits both refugees and their host communities to preclude rising social tensions.
- **Improve clarity and transparency about the availability and use of EU funds.** This will promote confidence among all stakeholders and EU citizens and inform a more effective response.

- **Include conditions on all EU funds requiring Member States to channel at least 30 percent of financing to local authorities and NGOs, and encourage more than 30 percent.** High co-financing rates (by which Member States are reimbursed with EU funds) are key to incentivizing greater localization. The European Parliament and Council should support these proposals.
- **Monitor implementation of the Temporary Protection Directive in Romania to ensure refugees can exercise their rights in practice.** Use visibility of both good practices and implementation challenges to inform future guidance and support to all EU Member States.
- **Encourage active participation of all EU Member States in the Solidarity Platform (SP).** Promote balance so that countries where Ukrainians prefer to live receive capacity support from others to accommodate them. Regularly include NGOs in SP meetings to improve transparency, information exchange, and coordination.

UN Agencies and international non-governmental organizations should:

- **Improve cooperation and empower local civil society organizations (CSOs) in the response.** Strengthen UN interagency referral mechanisms and streamline coordination mechanisms to reduce duplication and create space for more efficient information exchange and strategic planning. Provide language interpretation and training for CSOs unfamiliar with the UN system to fully participate. Adapt donor processes to accommodate local NGOs' needs and ease grant application and reporting requirements.
- **Regularly engage refugees wherever they are to ensure far-reaching information provision and representative, accurate data collection.** Be present and consistent to build trust and the ability to gauge and adapt to changing needs. Prioritize community outreach and refugees' inclusion in decision-making as the most effective means of information dissemination.
- **Continue prioritizing GBV prevention, mitigation, and response and counter-trafficking measures.** Focus efforts on community-based protection to improve reporting and inform appropriate responses. Given systemic barriers to reporting and investigating GBV and trafficking, increase funding and programming to match the level of risk rather than the number of reported cases.
- **Streamline and strengthen reporting and referral mechanisms to better support survivors of GBV and trafficking.** Harmonize UN- and government-led efforts to strengthen capacity to support refugees seeking to report harm. Provide training on standards for confidentiality and case management to

organizations without experience in GBV response, and training in humanitarian response protocols for survivor-centered organizations. Work to establish transnational referral pathways to ensure continuity of care for survivors.

Methodology

This report complements Refugees International’s reporting on the humanitarian response [inside Ukraine](#) and to [refugees arriving in Poland in early March](#). It examines how the refugee response continues to materialize, particularly as refugee-hosting countries shift their focus from emergency operations to a more sustainable response. Refugees International sought lessons from Romania’s implementation of the Temporary Protection Directive for the EU and other Member States and assessed how Moldova—a non-EU country with far fewer resources—is using international assistance and coordinating aid efforts for refugees.

Refugees International’s Senior Advocate for Women and Girls, Devon Cone and Senior Advocate for Europe, Daphne Panayotatos traveled to Romania and Moldova from June 28-July 9, 2022. In Romania, they visited Iași, Suceava, Bucharest, Galați, and nearby border crossings in Siret and Isaccea. In Moldova, they met stakeholders and refugees in Chișinău and visited the Palanca border crossing point. The team spoke to refugees from Ukraine and dozens of people involved in the response, including staff and volunteers from international non-governmental organizations (NGOs), local civil society organizations, and United Nations (UN) agencies, as well as representatives of the European Union and U.S Government.

In this report, the term “refugees” refers to citizens and residents of Ukraine who crossed an international border to flee the fighting that began on February 24, 2022 and remain displaced outside Ukraine although, as explained below, most are not formally recognized as refugees.

Background: Support for Ukrainians in Romania and Moldova

As of late September 2022, Romania and Moldova were hosting [80,498](#) and [92,443](#) refugees from Ukraine respectively. But both countries have limited capacity in place to receive and integrate refugees. Historically, Romania has not been a primary destination for asylum seekers nor welcoming to refugees. Moldova is one of the poorest countries in Europe and not a member of the EU, leaving it with fewer financial resources to put towards the response and more vulnerable to rising food and fuel prices caused by the war.² It is also grappling with its own security concerns over long-standing [tensions with Russia](#).

Support from the UN, donor governments, international NGOs, and the private sector are therefore critical to bolstering the humanitarian response in Moldova and Romania. The UN's inter-agency [Regional Refugee Response Plan](#) (RRP) appealed for \$1.85 billion to meet the needs of 8.3 million people from March through December 2022.³ In particular, it requested [\\$414,194,842](#) for refugees in Moldova and [\\$239,858,526](#) for Romania. According to the UN Refugee Agency (UNHCR), the total appeal was [71 percent funded](#) as of September 23.⁴

In sharp contrast to its typical posture, the EU has demonstrated unprecedented solidarity and leadership in addressing the plight of people displaced by the war in Ukraine. Historically, many EU Member States have used various [physical](#), [policy](#), and [financial](#) means to close borders and deter refugees' arrivals, while EU institutions have failed to shepherd a coordinated regional policy. But the imperative of a strong and unified response to Russian aggression compelled the EU to quickly roll out policy initiatives and support that, in turn, have shaped the national response from Romania and Moldova.

Access to Territory

As millions of people fled Ukraine, EU States and Moldova upheld existing rules allowing Ukrainian nationals to enter and travel visa-free for up to 90 days. The EU also deployed extra staff from its Border and Coast Guard Agency, Frontex, to help frontline states (Hungary, Moldova, Poland, Romania, Slovakia) manage arrivals at the borders. On March 2, 2022, the European Commission issued [operational guidelines](#) that encouraged authorities to relax border checks, adopt more flexible entry conditions for non-EU nationals (including non-Ukrainians), and allow passage through temporary, unofficial border crossing points.

Access to Legal Status

On March 4, 2022, the European Council unanimously agreed to activate the [Temporary Protection Directive](#) (TPD) for the first time in the bloc's history.⁵ Eligible individuals fleeing the war in Ukraine need only register for residence in any EU Member State in order to secure access to housing, social welfare assistance, healthcare, education, employment, and banking services there.⁶ Protection is valid for at least one year and up to three years and also grants the right to move freely in the EU for up to 90 days within a 180-day period.⁷ Individuals can also decide to change their residence and re-

register for temporary protection in a different EU Member State. Activating TPD thus spares individuals the burden of navigating complicated, lengthy, and restrictive asylum processes and eases the administrative pressure on already strained asylum systems.

Romania transposed the TPD into national law on March 18, 2022,⁸ extending eligibility to Ukrainian nationals who had left Ukraine and were in Romania before February 24. Ineligible individuals can apply for asylum or, if planning to go to a third country, receive a 90-day transit visa. Temporary protection is valid for one year and can be automatically renewed for two six-month periods. Registering for temporary protection is a simple procedure. Despite initial delays with the process, particularly in cities receiving many refugees, NGOs and UNHCR told Refugees International that refugees now find it quite easy to navigate once given the necessary information.

As a non-EU Member, Moldova is not bound by the TPD. A form of temporary protection similar to the EU's is [provided for in Moldovan law](#) but has never been granted.⁹ Instead, the government has allowed Ukrainian citizens, their non-Ukrainian spouses, and other third-country nationals who had refugee status in Ukraine to live and work in Moldova for the duration of a 60-day state of emergency.¹⁰ [First announced](#) in late February and [repeatedly extended](#), it will next expire on October 8, 2022. Although positive, the measure's short timeframe leaves refugees vulnerable. If the state of emergency ends or political power shifts to a less welcoming government, those who have sought refuge in Moldova could suddenly find themselves in the country irregularly.

Individuals wishing to secure their stay longer-term must apply for a residence permit or apply for asylum through Moldova's usual [asylum process, which takes six months or longer](#). According to UNHCR, Romania's Asylum and Integration Directorate (AID) could only process about 100 asylum applications annually and already had a backlog prior to 2022. Given this limited capacity and the importance of granting a more certain legal status for Ukrainians, the Moldovan government should grant Ukrainians temporary protection. The Bureau of Migration and Asylum has, in fact, [recommended](#) this to the Ministry of the Interior, but the Ministry has not taken further action.

EU Financial Assistance

The EU has also mobilized [significant amounts of funding](#) to help Romania and other EU Member States meet refugees' needs in the immediate and longer terms. Three

regulations approved in April 2022 made [more than €20 billion](#) available. A [subsequent set of proposals](#) adopted in June would unlock more funding. The changes grant Member States greater ease and flexibility to access and re-purpose previously allocated funds.¹¹ For example, in April, Romania received a first advance payment of about [€450 million](#) from the EU's [COVID-19 recovery fund](#). The Directorate-General for Migration and Home Affairs (DG HOME) has also made up to [€400 million](#) of emergency assistance available, with an initial tranche of [€248 million](#) to support Poland, Romania, Hungary, Slovakia, and Czechia, and a second tranche of €152 million in the pipeline. Member States request these funds to cover their costs and have discretion to report their use.

The EU has made [€13 million of humanitarian aid](#) available to help Moldova provide food, water, healthcare, shelter, and other basic needs for people fleeing Ukraine. In early June 2022, the Commission announced it would transfer €26.2 million [initially planned for projects in Russia and Belarus](#) to support the development of health services, education, job training, and social inclusion in Moldova. Through the [EU Civil Protection Mechanism](#), 18 EU Member States plus Norway have offered life-saving supplies, including medicine, hygiene kits, and equipment. And in July 2022, the Commission and Moldovan government launched the [EU Support Hub for Internal Security and Border Management](#) to coordinate operations tackling six key issues, including human trafficking.

EU Initiatives and Assistance

On March 28, 2022, the European Council approved the Commission's proposed "[10-Point Plan](#)," which called for establishing standardized approaches to providing transport, information, and reception for refugees; developing contingency and response plans; and mobilizing funding and resources for EU Member States and Moldova. As also called for, the Commission presented a [Common Anti-Trafficking Plan](#) on May 11, formalizing coordination between the EU's Anti-trafficking Coordinator and respective national coordinators; launched an [EU registration platform](#) on May 31 for Member States to exchange information about recipients of temporary protection; and issued guidance on July 6 for organizing private accommodation programs as part of the [Safe Homes Initiative](#).¹²

The Commission also established the [Solidarity Platform](#) (SP), which tracks and shares information about countries' varying needs and capacities in order to distribute

resources or encourage refugees' movements accordingly. Coordinated by DG HOME, the SP convenes EU Member States, Schengen Associated States, and Moldova; relevant [EU agencies](#); UN agencies, including UNHCR and the International Organization for Migration (IOM); and Ukrainian authorities weekly. Unfortunately, NGOs have been invited to join only one extraordinary meeting since the SP's launch. By mapping reception capacity and tracking implementation of TPD, the SP provides not only a framework for cooperation and support to Member States, but [information](#) for refugees about their ability to exercise their rights to make informed choices about where to live. With UNHCR and IOM, the Commission also coordinates a [free air transfer program](#) through the SP, which helps refugees in Moldova relocate to countries with greater capacity that have pledged to welcome them.

Practical Obstacles to Protection and Integration

Basic Needs

At the time of Refugees International's trip, refugees arriving in Romania and Moldova from Ukraine could find immediate relief at entry points at the borders and train station. Fewer actors were present than in the chaotic, early days after the invasion, but some humanitarian actors remained to provide information, food and non-food items, first aid, and transportation. Although the relative stability was a positive sign, some civil society representatives worried it would lead donors to prematurely end funding for border response. Those fears appear to have materialized—in a remote interview in September 2022, UN staff in Bucharest told Refugees International the number of groups operating at entry points had continued to drop, leaving refugees' basic needs unmet. The Romanian government had called on NGOs to resume services, particularly food provision.

Many refugees choosing to stay in [Romania](#) and [Moldova are likewise having](#) trouble affording essential items as they exhaust their savings and donations slow. The World Food Program (WFP) provides meals for refugees staying at government-managed accommodation centers. But only about [13 percent of refugees from Ukraine in Romania](#) and about [4 percent in Moldova](#) live in such centers. Refugees International visited several sites where NGOs distribute basic necessities, including a food pantry in Bucharest set up by the local office of an INGO. The organization, like others, also provides vouchers to refugees with special needs—such as pregnant women, people with disabilities, and families with babies—to purchase items that are not available at the pantry.

Representatives of NGOs and UN agencies emphasized that cash-based initiatives (CBIs) are the most effective means of supporting refugees in the immediate term. Because they often need time to secure livelihoods in a new country, displaced people rely on cash assistance as essential transitional aid to meet their basic needs with greater autonomy while benefiting the host economy. In Moldova, UNHCR manages the principal [cash-aid program](#) for refugees, coordinating with NGO implementing partners and the government. It provides MDL2,200 (about US\$120) per month for unconditional use. As of July 5, 2022, [65,417 refugees](#) had received at least one payment, and a verification exercise was underway to update active caseload data. Notably, refugees surveyed in June 2022 reported primarily using cash ([96 percent](#)) for food. In Romania, UNHCR also manages a [multi-purpose cash program](#), implemented by NGO partners, in which [18,225 refugees from Ukraine were enrolled](#) as of September 2022. Eligible refugees receive RON568 (about US\$120) per month for three months. Ahead of winter, UNHCR [has planned additional support](#) for refugees with specific vulnerabilities.

In both countries, UNHCR's reliance on multiple implementing partners and some NGOs' efforts to implement CBIs from their own operating budgets can create duplication and complication as refugees navigate discrete aid channels. And still, tens of thousands of refugees are not enrolled in any cash assistance program. Better coordination and communication among humanitarian actors and with refugees would make CBIs more efficient and accessible, while financial contributions from the governments would help ensure their sustainability.

Accommodation

In both Romania and Moldova, the vast majority of Ukrainian refugees live in private accommodations, including rented apartments, homes with host families, and locals' unoccupied homes. In Romania, the government's so-called "[50/20 program](#)" partially offsets costs for locals hosting refugees—it provides RON50 (US\$10) per refugee per day for expenses and RON20 (US\$4) per day for food. In Moldova, WFP manages a program that provides between MDL3,900 – 4,800 to host families, depending on how many refugees they host.

Housing in private accommodation can support refugees' independence and facilitate their integration into host communities, but also presents challenges. Early on, informal initiatives emerged to match interested hosts and refugees. International organizations and NGOs welcomed local citizens' generosity but warned of the dangers of unregulated

programs, particularly for women and children. In response, officials intervened to create formal programs to register hosts and match them with refugees, such as [Un Acoperis](#) in Romania, or to [verify housing offers](#).

In Moldova, NGOs help vet living conditions and make appropriate matches—for example, by placing single women with families rather than with single men—and agreed with UNHCR that arrangements had improved. But one NGO representative acknowledged that, although it is no longer a “free for all,” refugees sometimes have little choice but to go wherever is available. Moreover, there is no clear protocol if someone reports violence or exploitation by a local host. Governments should firstly streamline and strengthen reporting mechanisms, which UNHCR can spread awareness of through its [Stay Safe campaign](#) and partner trainings. Clear referral pathways would ensure that, at a minimum, a harmed individual’s first point of contact could immediately move them to alternative housing and alleged perpetrators cannot host again.

Similarly, NGO staff in Romania said that still, “the risks are huge,” as hosts are not sufficiently vetted. They are also not bound by formal contracts, leaving refugees vulnerable to exploitation, inadequate living conditions, and arbitrary eviction. UNHCR and NGOs added that limited visibility of refugees living in private accommodation raise the risk that these and other harms, including gender-based violence (GBV), go undetected.

The risks to refugees dependent on the unpredictable generosity of hosts are increasing as resentment and wariness over welcoming Ukrainians grows in [Romania](#) and [Moldova](#). Moreover, rising inflation may mean available subsidies no longer suffice as incentives to continue hosting. Many refugees therefore try to rent their own apartments, but local residents told Refugees International that the increased demand and limited supply are driving rent prices up. Furthermore, most landlords require leases of at least six months, which some Ukrainians are unwilling to commit to. An INGO worker in Romania said they had even seen discriminatory apartment listings stating Ukrainians could not apply.

Refugees have also had access to shelter in collective accommodation centers, though most stay only briefly upon arrival in the country. In recent months, authorities have sought to close these facilities, which sat relatively empty or, like schools, were needed for their usual purpose. But before closing all centers, adequate alternatives must be available. And authorities recognize they must maintain some capacity to urgently house refugees in case developments in Ukraine trigger another sudden, large

displacement. Therefore, even while prioritizing expanding access to independent housing for refugees, governments must also invest in improving conditions in the collective centers that do remain. Currently, conditions vary significantly.

During a visit to a Refugee Accommodation Site (RAS) in Iași, the Refugees International team was impressed with the relatively high-quality facility and services offered, including language classes, basic medical and mental healthcare, computer access, and a “mother & baby room” with formula makers. But while the government donated the building, operations at the RAS are otherwise funded entirely by NGOs. Staff worried about sustainability, noting their biggest challenge is securing funding for the essential programs they provide. They spend significant amounts of time preparing grant proposals and reports for various donors.

In Moldova, Refugees International visited a Refugee Accommodation Center (RAC) that primarily houses Roma people from Ukraine in a converted university building. Refugees lived in large, shared classrooms, with little privacy. Facilities were not winterized—residents only had access to a few outdoor showers and said they needed new windows with proper curtains. Children did not participate in schooling or any other formal activities. It was not well-equipped to host refugees long-term, though most people had been there for at least three months and had no immediate plans to move. A woman from Odessa living in the RAC told Refugees International, “If I could get free housing, I would go elsewhere; but I can’t, so this is where I have to be.” As the war progresses and housing markets tighten, more refugees may be in this position.

Ultimately, NGOs in both countries said authorities had publicly stated commitments to welcoming Ukrainian refugees and endorsing NGOs’ efforts, but not backed that up with funding. Some are awaiting government compensation for activities they carried out in the response. UN staff in Romania also noted that the government had prioritized compensating hosts rather than refugees directly. Though the idea was that this would increase the housing supply, reports that some hosts are not honestly using the cash to provide for their guests are raising questions about its effectiveness.

Employment

To [support Ukrainians’ access to the job market in their respective host countries](#), the EU has issued recommendations to facilitate authorities’ recognition of academic and professional qualifications obtained in Ukraine and created an online “EU Talent Pool”

“for displaced people from Ukraine to match skills with job vacancies.” Nevertheless, [many refugees remain unemployed](#) or underemployed in Romania and Moldova.

In Moldova, only [560](#) Ukrainians reportedly had jobs as of mid-June 2022. In Romania, 4,500 Ukrainians [had registered](#) in the national “[Jobs for Ukraine](#)” database and [6,431](#) Ukrainians had been offered jobs by early August 2022. Apart from a few refugees who were newly hired by NGOs, none of the Ukrainians Refugees International spoke with were employed. Staff at accommodation centers in Romania and Moldova told Refugees International that of the refugees who are working, most clean homes, prepare food, or work in the manufacturing industry.

Adult language classes would help address one of the major barriers to employment refugees face. Access to childcare is also critical. In March 2022, [92 percent](#) of Ukrainian adults who arrived in Moldova and [93 percent](#) who arrived in Romania were traveling with at least one child. Most women had to leave their male partners behind and arrived in unfamiliar countries without their usual social networks. For these single mothers, working is impossible without access to childcare, particularly so long as their children are not attending school in person. However, NGOs supporting Ukrainian women told Refugees International that childcare is not readily accessible. Some groups of women have self-organized to share childcare responsibilities, but more secure access to predictable and supportive care is necessary.

Finally, even if refugees overcome these practical barriers, Refugees International learned that employers may hesitate to hire Ukrainians who they fear will not stay in the country very long. The government and UN should prioritize private sector engagement to encourage hiring despite these concerns.

Education

Of the approximately 175,000 Ukrainian refugees living in Romania and Moldova as of August 2022, more than [84,000](#) are [children](#). At the time of Refugees International’s visit, relatively few of them were enrolled in school in Romania and Moldova. The Ukrainian government had in fact urged children to continue learning the Ukrainian curriculum via the online school system it developed during the COVID-19 pandemic. But as a new school year approached, international actors and NGOs sought to promote children’s enrollment into the local education systems, emphasizing that participation in formal education is important for children’s academic progress and social integration.

However, refugees' uncertainty about when they might return to Ukraine [kept some from enrolling](#) their children in school. Language barriers deterred others from attending—in a survey published in August 2022, [90 percent](#) of Ukrainian parents and legal guardians in Romania cited language as a reason they had not enrolled their children. In fact, authorities in Romania and Moldova have only allowed Ukrainian children to audit classes rather than formally enroll and earn class credits because language barriers hinder full participation. Refugees in Moldova face an additional legal hurdle, as they must have registered as asylum seekers to enroll.

Despite concerted [efforts to increase enrollment](#) ahead of the new school year, rates remain low. As of mid-September 2022, of the tens of thousands of children in each country, only about [4,000 Ukrainian children](#) were enrolled in school in Romania and just over [1,000 children](#) in Moldova, of which less than 300 were fully enrolled. In both countries, most Ukrainian children remain auditors.

In addition to addressing obstacles to enrollment, school administrators need more capacity to accommodate more refugee children. Beyond basic infrastructure, this includes providing adequate sanitation facilities, school feeding programs, and accessibility for students with disabilities; integrating psychosocial support services into education; and hiring and training teachers who work with refugee populations on cultural sensitivity and social cohesion. In Moldova, a UNICEF representative acknowledged that overcoming capacity constraints—which already affect school access for thousands of local children—is a significant challenge.

Healthcare

In Romania and Moldova, public health services are only free for emergency care and some pregnancy-related services. With only limited cash assistance and trouble securing employment, many refugees are thus unable to afford medicine, ongoing care, or specialized treatment. This is a particular challenge for individuals with chronic or more complicated medical conditions or disabilities. Even when care is available and affordable, aid workers said refugees often face language barriers.

International organizations and NGOs have therefore stepped in to bolster access to healthcare for refugees. IOM, for example, provides free health services for refugees in [Romania](#) and [Moldova](#). But because the overall quality of care in Moldova is [relatively](#)

[low](#), refugees with complex health conditions often must relocate to other EU countries for treatment.

Access to other types of care critical for this refugee population can also be difficult. [NGOs report](#) that a lack of information among both refugees and healthcare providers about what services refugees have a right to and how to access them hinders care. That includes sexual and reproductive healthcare (SRH)—including pre- and perinatal care—which is especially important given the number of young women refugees. Although Ukrainians are eligible for the same SRH services as Romanian and Moldovan citizens, some refugees report being unaware of what is offered and where they can receive care. In addition to improving information dissemination and access to SRH, all aid actors Refugees International spoke to agreed that mental healthcare and psychosocial support (MHPSS) also must be scaled up and prioritized for people who, as one NGO worker said, “have been through so much and are still suffering.”

Gender-Based Violence and Trafficking

From the start, experts have [warned](#) of [very high risks](#) of GBV, making [robust monitoring](#) and support for survivors crucial parts of the refugee response. But GBV—which women may have experienced in Ukraine or while displaced—is [under-reported](#). Aid workers told Refugees International that women coping with the fresh trauma of war often [prioritize meeting basic needs](#) over reporting GBV or seeking mental healthcare. Moreover, because some organizations have withdrawn or shifted their operations since February and many refugees who first fled to Romania and Moldova have traveled onward, organizations have not always had time to build the trust necessary for survivors to feel safe reporting. Additionally, language barriers, lack of clarity about how and where to report, and overall stigma regarding GBV in both countries further complicate reporting.

Humanitarian organizations are thus rightly operating on the assumption that GBV exists, even while acknowledging they need a better understanding of the extent of the problem. A UNHCR specialist warned that, as various actors roll out services, “the question is if those services are up to international [protection] standards” and properly meet survivors’ needs.

For example, local organizations without experience working with these populations may need training on comprehensive case management, including [best practices](#) to

safely and ethically collect, store, and share GBV case data. In Romania, Refugees International spoke with several organizations that developed GBV programming, which explained that there are standard procedures—created by the GBV Working Group—for sharing case information. However, when asked how they refer cases to the relevant specialized service providers so that survivors can get the help they need, interviewees often said that they share information informally and outside of the standard referral mechanisms. This risks breaches of confidentiality and a lack of accountability. UNHCR has provided trainings to cover some of these topics in both Romania and Moldova and should scale them up.

To improve reporting and monitor if survivors' needs are met, humanitarian actors should prioritize community-based protection, which empowers Ukrainians to be involved in the response. A GBV expert in Moldova told Refugees International that encouraging survivors to report GBV directly to UNHCR, NGOs, or the authorities brought very few cases to light. However, once they shifted their approach to rely on trusted members of the Ukrainian community to serve as survivors' first points of contact and interlocutors, far more cases came to the attention of humanitarian responders who could provide assistance. In Moldova, UNHCR is supporting [Casa Marioarei](#) in its effective use of this community-building approach.

Displaced women also face higher risks of human trafficking, a [pre-existing problem](#) in [Moldova](#) and [Romania](#). Nevertheless, Refugees International received only anecdotal data from NGOs that had flagged suspicious activity to authorities, and authorities have only reported [a few confirmed cases](#). In briefings, the EU Anti-Trafficking Coordinator has [attributed this](#) to three factors. First, authorities recognized the risks and took deliberate, [coordinated](#) action to put prevention measures in place. Soon after refugees began arriving, organizations and authorities began more systematically collecting basic information about people arriving in reception centers and those offering aid. As the international response took shape, UN agencies offered training to volunteers and refugees to identify and report potential trafficking cases. For example, IOM staff at the Palanca bus station in Moldova now provide refugees information about their expected journeys so they can recognize risks and protect themselves. Second, governments' decisions to keep borders open and grant refugees access to work and other rights, as well as services like free transportation, have significantly reduced individuals' vulnerability to exploitation during and after transit.

Third, however, and perhaps most weighty, is the reality that trafficking often goes undetected and unreported. Even an approximate number of cases during this period of displacement [will not be known](#) for years. NGO and UN staff told Refugees International

that the absence of accurate data makes planning relevant programming challenging. UN staff also feared that having few confirmed cases could falsely signal to donors that trafficking is not a major problem and lead them to reduce funding for prevention and response measures. Given what is known about systemic barriers to reporting on sensitive issues like trafficking and GBV, funding and programming should correlate with the level of risk, not the number of reports.

Impediments to Effective Response

National Planning

The fluidity of the crisis has made contingency planning a priority for all stakeholders. Romania and Moldova must be able to quickly scale up reception capacity in case of another sudden large-scale displacement, especially as Russian aggression could next target Ukraine's Odessa region and [winter will exacerbate hardship](#) for people facing fuel shortages in Ukraine. Already in July 2022, stakeholders stressed the importance of beginning winterization projects and expressed concern about securing adequate funding for them.

But everyone Refugees International spoke to said developing appropriate programs and services in light of such uncertainty is challenging. This is especially true of integration support, as refugees are [hesitating to make long-term plans](#). Governments and donors might be reluctant to invest in activities like livelihood support and expanding social services when it is difficult to design need-based, right-sized programs and services. NGOs and UN agencies are further constrained if they receive only short-term grants. One volunteer working for a Spain-based NGO at the Isaccea border crossing in Romania said "organizations are improvising day by day," adjusting their operations based on how the situation changes and how much funding is available.

Even amid uncertainty, concrete government plans for refugees' mid- and long-term integration would signal sustained commitment to supporting refugees, which could both encourage local authorities to align their positions and attract support from regional and international actors. Comprehensive national planning is also critical to ensure the governments and their partners account for the specialized needs of marginalized groups who face greater challenges to integration.

The Moldovan government has not publicly issued a formal national plan, but rather continues to operate under provisional states of emergency that not only leave refugees in a precarious status but also makes planning difficult for stakeholders. A UNICEF specialist in Moldova told Refugees International that education partners had trouble planning for the upcoming school year not only because families had not yet decided whether to stay, but because the government had not presented a strategy for the sector. Without a long-term vision, it is difficult for international partners to know how to support authorities.

The Romanian government did launch a ["National Plan of Measures for the Protection and Inclusion of Displaced Persons from Ukraine."](#) In ways that [complement the UN's ongoing RRP](#), it focuses on providing access to health care, education and housing; child protection; and inclusion in the national labor market for refugees from Ukraine.¹³ However, the head of an INGO's Romania office told Refugees International he was skeptical about the government's ability to deliver on the strategy, arguing the Plan was not sufficiently actionable. Indeed, it provides a list of measures to advance goals in discrete sectors, each with varying levels of specificity regarding responsible implementing partners, possible funding sources, and progress indicators. There are no precise deadlines and some measures will require new regulation. In August 2022, another NGO leader said the real limitations refugees continued experiencing accessing their rights showed that the government had not taken sufficient steps to promote integration. In September 2022, UN representatives acknowledged authorities took little action over the summer but said the government had recently created working groups responsible for fleshing out and implementing the sectoral plans. To improve all actors' planning and coordination, these groups must work swiftly, transparently, and inclusively.

Access to Funding and Transparency

NGOs working on the response to refugees from Ukraine in Romania and Moldova were frustrated at the lack of clarity about how much the governments have spent from their own budgets; how much the EU and other donors have allocated and disbursed to each government; and how the authorities have used and distributed that funding. A Romanian NGO leader told Refugees International that when the government makes promises amid reports of donors seemingly "throwing billions of euros at the problem," it leaves refugees questioning why those promises go unfulfilled and private donors questioning why NGOs continue soliciting funds. In late August 2022, the Romanian

government [announced](#) Romania had just received a first installment of €39.1 million from the EU, despite larger amounts indicated in some [EU statements](#). They also said the Interior Ministry had spent about €63.9 million on the response.

In Moldova, a social worker said the government had yet to publicly report how much money it had received and spent, even as officials complained about not having adequate funding while the media reported donors giving significant amounts of aid. She said the government's "failure to communicate to its citizens" was a longstanding problem and source of public frustration.

Local authorities and NGOs leading the humanitarian response often have limited access to government funds. Notably, the EU Commission is requiring that national governments channel at least 30 percent of DG HOME's newly available Emergency Assistance funds to local entities, and also provide at least [30 percent of Cohesion Policy support](#) to local entities in order to benefit from a possible 100 percent co-financing rate (full reimbursement from EU funds).¹⁴ However, under the emergency ordinance the Romanian government passed to ensure financial resources for the refugee response, only the Department for Emergency Situations has authority to manage the funds. Moreover, local governments are restricted to using only a certain percentage of their emergency funds for the refugee response. For many, especially following the pandemic, there was little left to tap into. The government's centralized approach has significantly limited the scope of local governments' response. Nevertheless, as one NGO leader told Refugees International, some local authorities have been able to "perform miracles." "If [municipal authorities] could do so much with such limited resources, they could probably do much more with more!" she said.

Municipal governments in Moldova also face financial constraints. An NGO representative explained that, in the absence of financial support from the central government, some municipalities had to halt planned infrastructure projects to shift resources to the Ukraine response. There is a significant risk of tensions growing between local communities and refugees if the former perceive that their progress and wellbeing is coming at the expense of helping refugees. Already, a Bucharest local originally from Ukraine told Refugees International that "things have really changed" since the team's visit in July 2022. The positive media coverage about refugees and general public support for Ukrainians "is all gone," largely triggered by Russia's [decision](#) to stop supplying Europe with gas. Romanians' deep distress about the economic implications has translated into growing hostility toward Ukrainians. Programs launched to support refugees must therefore also benefit host communities—which in turn requires greater engagement with local governments. UN, EU, and U.S. government

representatives confirmed that the projects they fund and implement are designed to do this.

Local NGOs are further disadvantaged in Moldova, as they do not receive direct funding from either the European Commission's Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO)¹⁵ or the U.S. State Department. They can only access these funds through UN agencies or INGOs acting as intermediaries. This privileging of international entities undermines commitments donors have made, as in the [Grand Bargain](#), to direct more humanitarian funding directly to local groups that are often closest to, and thus best able to respond to, crises. In order to acknowledge the critical role these groups play and ensure they are adequately resourced to carry out the response, central governments should include them in national planning processes.

Greater transparency and coherent planning could also help counter a risk that stakeholders rush to spend down the large sums of money that quickly flowed from donors early in the crisis. Several people Refugees International spoke with across sectors warned of this, as it often does not allow for proper monitoring and needs assessments to shape the programs being funded. It can also preclude organizations from developing adequate capacity to manage those funds. Having the time and visibility to thoughtfully pace spending can ensure actors will have adequate funding to provide immediate humanitarian aid and longer-term integration support effectively and sustainably.

Data Collection and Information Provision

Interviews in both countries revealed that better collecting and sharing information about refugees' needs is critical. But several factors make information gathering challenging. Many refugees from Ukraine are not registered with asylum authorities and most live in private accommodations dispersed around each country, making it difficult to identify and reach them. Thus far, assessments disproportionately represent the needs of refugees living in collective accommodation sites, where it is easier to gather people, but where relatively few reside. Organizations must develop more creative, proactive means of reaching refugees where they are. In Moldova, for example, some NGOs deploy mobile teams to visit communities where refugees live. Workers at the RAS in Iași, Romania hoped that setting up a distribution area offering essential items for refugees not staying in the RAS would give them opportunities to survey people

about their needs. Ukrainians' relative freedom of movement around Europe also makes it difficult for aid actors to follow up with beneficiaries and monitor their ongoing needs and access to services if they leave the country.

Many of the same factors that complicate data collection also hinder information provision. Refugees need clear information about their rights, the services they are eligible for, and how to access them. Information appeared readily available at all three border crossing points Refugees International visited. Since March 2022, UN agencies have expanded their presence and visibility at borders and provide credible, official information about individuals' rights and options for onward travel. These and other actors operate in some reception centers, as well, where they also register individuals for services and offer legal aid. Concentrating services in single sites, like the [RomExpo](#) and [MoldExpo](#) convention centers, has proven effective. As a UNHCR representative explained, refugees sometimes arrive at RomExpo intending just to register for temporary protection, then learn about benefits like cash assistance while there. But access is more limited outside these hubs. In interviews at several sites, refugees, staff, and volunteers demonstrated varying levels of understanding about, for example, temporary protection, the air transfer program, and what to do in case of suspected human trafficking.

Some humanitarian actors told Refugees International that Ukrainian refugees are generally well-informed about their options because they have the technological literacy to access information online. But a Moldova-based representative of an international organization said the large number of different actors providing different informational materials about various issues and countries can be confusing and overwhelming. A Romanian NGO worker noted that, although the online resource page the government had quickly set up was helpful, it uses technical language difficult for non-experts to understand. A member of the European Union Agency for Asylum (EUAA) delegation in Moldova also found that having staff present to interact with people was more effective than relying on refugees to access information passively.

Importantly, Ukrainians are often themselves the most effective messengers within their communities, sharing information through robust online social networks. Well-established local organizations were also seen as credible sources of information. This underscores the imperative for stakeholders to engage displaced Ukrainians when developing programs and disseminating information and for donors to empower local groups in host communities.

Efforts by the EU, IOM, and UNHCR to track the questions refugees ask and update informational materials accordingly are key. For example, because many refugees in

Moldova considering the air transfer program want to know what their experience will be like in another country, UNHCR is encouraging governments to provide videos, stories, and other compelling information on its country websites. Individuals have also had very specific, individualized questions that UN and government officials were sometimes unequipped to answer. Thus, the Commission created a [Frequently Asked Questions \(FAQ\) Document](#) for policymakers that expands on the [Operational Guidelines](#) for TPD implementation by addressing specific cases governments have faced, while a regularly updated [webpage](#) answers FAQ from displaced individuals themselves. The key is to ensure information is not just plentiful, but accessible.

Coordination

In Romania and Moldova, the number and variety of actors that immediately mobilized to aid displaced people initially created chaos. At the Bucharest office of one INGO with a longstanding presence supporting refugees in Romania, staff expressed both appreciation for the additional funding and capacity that new groups brought, and frustration at having to provide extra training to groups inexperienced in working with refugees or in Romania. Months later, the situation had stabilized—some groups withdrew to focus on their usual mandates, while others adapted to remain engaged. Services at border crossing points were much more organized, and groups Refugees International spoke with in Siret, Isaccea, and Palanca said they worked well with other NGOs and local authorities there.

Nevertheless, several NGO representatives in Romania described major inefficiencies in the government and international response. Initially, the government established various working groups headed by relevant Ministries and open to NGO participation. However, as an INGO representative explained, its decision to severely limit NGO representation made civil society participation “meaningless.” Meanwhile, the UN had scaled up its operations, bringing with it its own coordination structures. Several NGOs said these were also not useful—they complained of having to attend countless meetings to simply provide updates on their individual activities. Some have stopped participating, though none denied the importance of coordination itself.

In Galați, an INGO representative gave a positive example of local NGOs coordinating amongst themselves to exchange information about people’s needs, then split responsibilities according to their individual capacity. Smaller CSOs less familiar with international organizations also tend to rely on each other. A religious charity running a private reception center in Suceava said church volunteers help arrange referrals for

refugees needing specialized medical care by conferring with other CSOs or referring people to known service providers in their community.

NGOs want more focused and inclusive meetings conducive to joint planning and strategic collaboration. Streamlining coordination structures would facilitate regular and comprehensive information exchange and up-to-date mapping of all actors and available services to inform those strategic decisions. Unfortunately, there has been instead a proliferation of mechanisms, including new UN-led sub-working groups and government-established working groups to implement the National Plan. The fact that UNHCR did not share NGOs' concerns that creating parallel systems could be unproductive signals a disconnect. But one INGO representative said coordination is a longstanding problem in Romania, where the government is not very open to working with civil society.

Coordination of the response in Moldova may provide a better model. It has been more structured and robust, in part because some UN agencies were already active in the country. UNHCR and UNICEF play coordination and capacity-building roles, leading working groups within the traditional cluster system, and IOM manages bus and air transfers [to Romania](#) and other countries. Both national and international NGOs participate in these systems and the Moldovan government is actively engaged. There is also close engagement with donor governments such as the United States and EU.

But UN representatives acknowledged that establishing good coordination takes time and has been difficult in such a fluid context. UNHCR told Refugees International they were trying to reduce the number of coordination mechanisms and processes in place to ease the burden on their partners, while ensuring that refugees are linked to services in a safe, effective, and efficient manner. Ukrainians' ability to move to and within the EU also means coordination must extend across borders—transnational referral mechanisms can promote continuity of care for refugees taking advantage of the air transfer program or moving on their own.

IOs and donors can facilitate the participation of local groups in the response by adapting coordination structures. For example, UN agencies can provide interpretation in English-language meetings and support for NGOs unfamiliar with how the UN system works. Beyond expanding funding for local groups, donors should make their administrative processes and reporting requirements less burdensome. An NGO worker managing a RAC in Moldova told Refugees International that although IOs and INGOs had helped support their operations, the extent of their requests and requirements was "overwhelming." Like Romanian NGOs, she said IOs and INGOs moved slowly and sometimes failed to follow up with support after expressing interest in a project.

Finally, differences in local governments' capacity and will also affect the quality of coordination. In Bucharest, for example, one NGO leader said that "no one expected" a positive response from the municipal government, but the mayor had at least allowed his officials to take steps needed to manage reception, including setting up RomExpo. Another NGO worker in Iași expressed a similar sentiment that, even if the local government had not done very much, it had at least "allowed the NGOs to do their jobs and fill in the gaps." Meanwhile, a coordinator from an INGO office in Galați described the rich, "solution-oriented" engagement from that county's prefecture, which represents the central government,¹⁶ despite its limited mandate and budget. In both countries, national governments and donors should empower local governments willing to do more to promote refugees' integration by highlighting their good practices and, most importantly, providing the financial and technical support they need to implement effective responses.

Conclusion

Romania and Moldova have taken important, positive steps to welcome refugees from Ukraine. But even amidst uncertainty about the duration of the ongoing war and resulting displacement, these governments must realize their stated commitments to facilitating refugees' inclusion. With support from the EU and international partners, Romania and Moldova can improve and sustain an effective response to the needs of those fleeing the war in Ukraine. They can also ensure renewed public support for protecting and hosting Ukrainians who have already entered Romania and Moldova and those who will undoubtedly arrive in the future.

¹ There were around 12 million border crossings from Ukraine into neighboring countries from February 24, 2022 to August 30, 2022, and more than 5.3 million border crossings back to Ukraine from February 28, 2022 to August 30, 2022.

² The Republic of Moldova is not yet a member of the EU but was [granted candidate status](#) on June 23, 2022, together with Ukraine.

³ The UN also allocated [\\$20 million from its Central Emergency Response Fund \(CERF\)](#) on February 24, 2022 to "immediately scale up life-saving humanitarian assistance and protection to civilians in Ukraine." The launch of the RRP on March 1 was part of a [coordinated emergency appeal](#) that also included an [OCHA Flash Appeal](#) for \$1.14 billion to assist 6 million people inside Ukraine over an initial three-month period.

⁴ UN OCHA's Financial Tracking Service (FTS) reported that the RRP was just 49.6 percent funded as of September 29, 2022 (41 percent and 46 percent for Moldova and Romania respectively). However, OCHA notes that: "FTS counts 'Commitment' and 'Paid' contributions towards the overall funding situation as these are reported after a signed agreement or transfer of monies, respectively; while a 'Pledge' is recorded in FTS but not counted towards any totals until it is formalized into a commitment or paid contribution." Specifically, reported funding was \$73.3 million for Romania and \$151.6 million for Moldova. See: <https://fts.unocha.org/appeals/1103/flows>.

⁵ Council Implementing Decision (EU) 2022/382 of 4 March 2022 establishing the existence of a mass influx of displaced persons from Ukraine within the meaning of Article 5 of Directive 2001/55/EC, and having the effect of introducing temporary protection, March 4, 2022, accessible at [EUR-Lex](#).

⁶ The TPD applies, at a minimum, to Ukrainian nationals who were residing in Ukraine on February 24, 2022 and displaced by the conflict; non-Ukrainian individuals ("third-country nationals," TCNs) and stateless people who were residing in Ukraine with refugee or equivalent protective status before February 24, 2022; and family members of these two groups of people. TCNs and stateless people who were legally residing in Ukraine on the basis of a permanent residence permit and who can prove they are unable to return to their country of origin in safe and durable conditions must either receive protection under the TPD or under a comparable national protection scheme. EU Member States have discretion to extend the TPD's scope beyond these criteria, and many [have done so](#).

⁷ Because Romania is not part of the Schengen Area, individuals who enter the EU through Romania will have their documents checked again at the border of the first EU country that forms part of the Schengen area.

⁸ [Government Decision No. 367/2022](#). For the full set of legislation providing the legal basis and entry into force of measures providing reception and protection for individuals displaced by the crisis in Ukraine, see the EU Agency for Fundamental Rights (FRA): <https://fra.europa.eu/en/publication/2022/national-legislation-implementing-eu-temporary-protection-directive-selected-eu>.

⁹ Article 3 of Law 270/2008 defines temporary protection as "a form of exceptional protection aimed to ensure, in the event of a massive and spontaneous influx of displaced persons who are unable to return to their country of origin, immediate and temporary protection to such persons, if there is a risk that the asylum system will not be able to process this flow without adverse effects for its efficient operation, in the interest of the persons concerned and other persons in need of protection." It is valid for one year and can be renewed up to two years. See: <https://cda.md/2022/06/20/the-opinion-of-the-executive-director-of-cda-about-the-temporary-protection-orlack-thereof-in-the-republic-of-moldova/>.

¹⁰ Other third-country nationals must leave Moldova within 90 days of arrival, or apply for asylum or residency.

¹¹ This includes €3.5 billion in advance payments from the [Recovery Assistance for Cohesion and the Territories of Europe](#) (REACT-EU) and remaining cohesion funds from the 2014–2020 budget period under the [Cohesion's Action for Refugees in Europe](#) (CARE) proposal. This was expanded in July 2022 through [FAST-CARE](#).

¹² The Commission is working within the operational framework of the EU Migration Preparedness and Crisis [Blueprint Network](#), which [was proposed](#) in September 2020 as part of the yet-to-be-approved EU Pact on Migration and Asylum. In a migratory "crisis" situation, it convenes EU Member States and EU agencies to exchange information and coordinate decision-making, including about the deployment of resources.

¹³ Formally, the "National plan of measures on the protection and inclusion of displaced persons from Ukraine, beneficiaries of temporary protection in Romania."

¹⁴ As defined by the European Commission, "The term 'co-financing rate' refers to the contribution EU funding makes to a programme. It is expressed as a percentage of the total programme cost. Co-financing is usually subject to a maximum threshold, which is defined as a percentage of the total value of the programme, or part thereof. The Commission specifies co-financing rates for each operational programme." See: https://ec.europa.eu/regional_policy/en/policy/what/glossary/c/co-financing-rate.

¹⁵ EU legislation restricts DG ECHO to only directly funding EU-based NGO partners.

¹⁶ In Romania, prefects are appointed officials representing the central government in each of the country's 41 counties, as well as the Municipality of Bucharest.