

# Fundamental rights of children displaced in the EU following the Russian war of aggression

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## Contents

1. Children fleeing Ukraine	4
1.1. Data on children fleeing Ukraine.....	4
1.2. Crimes against children fleeing Ukraine and children going missing.....	6
2. Child protection – legal, policy framework and procedures in place	7
2.1. Responsibilities of child protection authorities .....	7
2.1.1. Individual children, including unaccompanied and separated children .....	7
2.1.2. Children evacuated from Ukrainian institutions.....	10
2.2. Safeguards and measures addressing risk of violent crimes against children fleeing Ukraine .....	11
2.2.1. Safeguards to protect and defend children from crimes.....	11
2.2.2. Support for children victims of crimes.....	11
2.3. Guardianship/legal representation arrangements for unaccompanied and separated children fleeing Ukraine .....	12
2.3.1. Arrived unaccompanied .....	12
2.3.2. Arrived without parents, but with other family members, neighbours or family friends	14
2.3.3. Arrived within a group, from Ukrainian institution or foster carers (with or without an appointed legal guardian) .....	15
2.3.4. Arrived within a group, through private initiatives, such as football clubs (with or without an appointed legal guardian).....	16
2.4. Placement of unaccompanied and separated children fleeing from Ukraine .....	17
2.5. Children evacuated from Ukrainian institutions.....	18
2.5.1. Institutional placements .....	18
2.5.2. Alternative care.....	18
2.5.3. Safeguards for children placed in institutional care settings.....	18
2.5.4. Access to local services and support.....	19
2.6. Child-friendly information and means to ensure participation of children from Ukraine.....	19
2.6.1. Child friendly information .....	19
2.6.2. Child participation .....	20
3. Access to social rights	21
3.1. Access to health care.....	21
3.1.1. Scope of medical care for children fleeing Ukraine .....	21
3.1.2. Challenges in practical provision.....	23

3.1.3. Mental health and psychosocial support for children fleeing Ukraine.....	24
3.2. Access to education.....	25
3.2.1. Types of schooling.....	25
3.2.2. Support to integration in the formal educational system .....	28
3.2.3. Data on drop outs and NEETs (not in education, employment, or training) .....	29
3.3. Access to social welfare – forms of social assistance related to children.....	30
4. Additional legal and practical barriers and challenges	32
4.1. General challenges .....	32
4.2. Challenges for children at multiple risk/disadvantage .....	33
5. Policies in place	34
5.1. Dedicated action plan and/or integrated measures .....	34
5.2. European Child Guarantee .....	35
5.3. Budget .....	35
Annex 1 – Research and data	36
Annex 2 - Promising practices	39

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# 1. Children fleeing Ukraine

## 1.1. Data on children fleeing Ukraine

**Table 1 Children fleeing Ukraine**

Category of child	Registration system Y/N	Number of children (as disaggregated as possible) (as of 30 April 2023 unless otherwise specified)
Overall number of children	N	No data available. <sup>1</sup>  The Ministry of Education, Science and Culture publishes weekly statistics on the number of Ukrainian children aged 4-17 years registered at the Personal Records Database. On 7 May 2023 this number was 20,400. <sup>2</sup>
Arrived accompanied by mother, father or another legal guardian	N	No data available. <sup>3</sup>
Arrived without parents, but with other family members, neighbours or family friends	N	850 (estimated) <sup>4</sup>
Arrived unaccompanied	N	150 (estimated) <sup>5</sup>

<sup>1</sup> Information provided by an official of the Programme Directorate General Ukrainian Displaced Persons at the Ministry of Justice and Security in a telephone interview (14 June 2023).

<sup>2</sup> The Netherlands, Ministry of Education Culture and Science (*Ministerie van Onderwijs, Cultuur en Wetenschap*) (2023), Weekly review of Ukrainian pupil and student enrollment in schools ([Weekoverzicht inschrijving Oekraïense leerlingen op scholen](#)), 8 May 2023.

<sup>3</sup> Information provided by an official of the Programme Directorate General Ukrainian Displaced Persons at the Ministry of Justice and Security in a telephone interview (14 June 2023).

<sup>4</sup> Information provided by an official of Nidos, the guardianship authority, by an email sent on 13 June 2023.

<sup>5</sup> Information provided by an official of Nidos, by an email sent on 13 June 2023.

Arrived within a group of children, as an organised evacuation from Ukrainian institutions or foster carers (with or without an appointed legal guardian)	N	154 children on 23 May 2023 (estimated). <sup>6</sup>
Arrived within a group of children, through private initiatives, such as football clubs (with or without an appointed legal guardian)	N	The Ministry of Justice and Security received no information on such arrivals. <sup>7</sup>

Source: Nidos by email on 13 June 2023 and Ministry of Justice and Security by email on 12 June 2023.

There is no special centralised system for the registration of persons fleeing from Ukraine, including children, fleeing from Ukraine. The first point of contact of persons fleeing Ukraine with the Dutch authorities often takes place at one of the hubs of the Safety Regions (*Veiligheidsregio*). The Safety Region is a public body whose task it is to facilitate regional cooperation between the municipal authorities in dealing with crises. There are 25 Safety Regions in the Netherlands. Registration takes place at these hubs in a system of the relevant Safety Region. There is no national system. From these hubs, all displaced persons are referred to a municipality that provides them with reception.

Once they are residents in a municipality, all persons fleeing Ukraine must register at the national Personal Records Database (*Basisregistratie Personen*).<sup>8</sup> The Personal Records Database contains the personal data of all people who live in the Netherlands. Registration in the Personal Records Database takes place at the municipality where the displaced person resides.

The Ministry of Security and Justice publishes weekly figures on how many Ukrainian displaced people are registered at the Personal Records Database (*Basisregistratie*

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<sup>6</sup> Information provided by an official of the Programme Directorate General Ukrainian Displaced Persons at the Ministry of Justice and Security in a telephone interview (14 June 2023).

<sup>7</sup> Information provided by an official of the Programme Directorate General Ukrainian Displaced Persons at the Ministry of Justice and Security in a telephone interview (14 June 2023).

<sup>8</sup> The Netherlands, National Government (*Rijksoverheid*) (2023), '[Arrival, registration and stay of refugees from Ukraine](#)', Web page.

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Personen). On 8 May 2023, 92,530 Ukrainian displaced people were registered at the Personal Records Database.<sup>9</sup>

A report published by Defence for Children on 22 December 2022, found that due to the decentralised reception of displaced persons from Ukraine no central registration takes place: “The regional and local approach of the Ukrainian refugees means that the overarching perspective and overview when it comes to screening for vulnerability and care needs is often lacking.” [“De regionale en lokale aanpak van de Oekraïense vluchtelingen maakt dat de overkoepelende blik en het overzicht, als het gaat om screening op kwetsbaarheid en zorgbehoeften, vaak ontbreekt.”].<sup>10</sup>

## 1.2. Crimes against children fleeing Ukraine and children going missing

**Table 2 – Serious crimes against children fleeing Ukraine and children going missing**

Issue / risk	Number of cases i) reported and ii) investigated
Violence, including domestic violence	Not available.
Sexual abuse	Not available.
Trafficking for exploitation	Not available.
Children reported as missing	Not available.
Other crimes against children fleeing Ukraine	Not available.

Source: National Police.

We have sent an email request to the National Police whether such data are available. The National Police indicated by email that it could not provide information on these issues.<sup>11</sup>

<sup>9</sup> The Netherlands, Ministry of Security and Justice (*Ministerie van Veiligheid en Justitie*) (2023), ‘Figures reception of refugees from Ukraine in the Netherlands’ ([Cijfers opvang vluchtelingen uit Oekraïne in Nederland](#)), Web page.

<sup>10</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen, zijn ze in beeld?](#)), page 34, Leiden, Defence for Children.

<sup>11</sup> Answer from the National Police received by email on 5 June 2023.

## 2. Child protection – legal, policy framework and procedures in place

### 2.1. Responsibilities of child protection authorities

#### 2.1.1. Individual children, including unaccompanied and separated children

##### *General framework*

In the Dutch child protection system, the responsibility for individual children fleeing Ukraine is shared by the municipal authorities, the Child Care and Protection Board (*Raad voor de Kinderbescherming*), and if unaccompanied or separated children are involved, guardianship organisation Nidos.<sup>12</sup>

In the Netherlands, the reception of displaced persons from Ukraine is organised in a decentralized way. Responsibility rests with the municipalities and Safety Regions.<sup>13</sup> The Safety Region is a public body whose task is to facilitate regional cooperation between the municipal authorities in dealing with crises. There are 25 Safety Regions in the Netherlands. The local or regional authorities (municipalities or Safety Regions) will be the first authorities to identify unaccompanied children or children accompanied by an adult relative, a foster family or a person looking after the child.

Since June 2022, procedural agreements about the intake and registration of unaccompanied children fleeing Ukraine have been drawn up by Nidos and the Association of Netherlands Municipalities (*Vereniging van Nederlandse Gemeenten*). Nidos provides information about these procedural agreements on its website.<sup>14</sup> The

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<sup>12</sup> The Netherlands, Nidos (2023), 'Ukrainian unaccompanied children and reception' ([Oekraïense AMV's + Opvang](#)), Web page.

<sup>13</sup> The Hague Academy for Local Governance (2022), '[Dutch Municipalities at the Centre of the Ukraine Refugee Response](#)', New release, 3 May 2022.

<sup>14</sup> The Netherlands, Nidos (2023), 'Ukrainian unaccompanied children and reception' ([Oekraïense AMV's + Opvang](#)), Web page.

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Association of Netherlands Municipalities published a special guideline about the agreements.<sup>15</sup>

### *Unaccompanied children*

If the local or regional authorities (the Safety Region or the municipality) identify an unaccompanied child from Ukraine (whether at a hub or in one of the municipal or private reception centres, in a host family or during the registration at the Personal Records Database), the authorities must contact guardianship institution Nidos immediately.<sup>16</sup> Nidos will place the child in an emergency shelter and conduct an intake with the child, if possible also remotely with parents, and will assess whether it is necessary to apply for temporary guardianship. The municipality can report the child to Nidos through a dedicated telephone number or email address. When Nidos determines that applying for temporary guardianship is appropriate, it will submit an application to the court. If this guardianship application is granted by the court, Nidos will carry out the guardianship until the parents of the child can take over again. For all minors notified to Nidos where no request for temporary guardianship is gone to court, guardianship is exercised by the parent(s) in Ukraine and daily care is carried out by an adult appointed by the parent(s).

Nidos is also responsible for the reception of unaccompanied children placed under its guardianship and will place the children fleeing Ukraine in a foster family or in a small scale facility.<sup>17</sup>

### *Children accompanied by an adult*

If the local or regional authorities (the Safety Region or the municipality) come across a child accompanied by one or more adults who are not his or her parent, the authorities will at first conduct an investigation into the formal relations between the child and the accompanying adult (by checking identity documents and other official documents).<sup>18</sup> In case that the accompanied adult is not the parent or does not have the legal documents, then the authorities will contact guardianship institution

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<sup>15</sup> The Netherlands, Association of Netherlands Municipalities (*Vereniging van Nederlandse Gemeenten*) (2022), Identification of minors from Ukraine. Guideline for municipalities ([Signalering van minderjarigen uit Oekraïne. Handreiking voor gemeenten](#)).

<sup>16</sup> The Netherlands, Nidos (2023), 'Ukrainian unaccompanied children and reception' ([Oekraïense AMV's + Opvang](#)), web page.

<sup>17</sup> The Netherlands, The Netherlands, Central Agency for the Reception of Asylum Seekers (*Centraal Orgaan opvang asielzoekers*) (2023), '[Unaccompanied minors](#)', Web page.

<sup>18</sup> Altling von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen, zijn ze in beeld?](#)), page 17, Leiden, Defence for Children.



Nidos, through the same dedicated phone number or email address mentioned above. During an intake with the child, Nidos assesses whether the adult accompanying the child is able to supervise the child. Following this assessment and if the adult accompanying the child is considered unable to supervise the child, Nidos will submit a request for guardianship to the court, but only if the added value of this is recognised by the accompanied child.<sup>19</sup> If this request is granted by the court, Nidos will carry out the guardianship until the parents can take over again. The guardianship is carried out by a guardian employed by Nidos. Nidos is funded by the Ministry of Justice and Security. Nidos is also responsible for placing the child allocated under its in guardianship in care, by a foster family or a small-scale facility administered by Nidos.

If the accompanied child stays in a host family (a host family not selected by Nidos), Nidos reports this to the Child Care and Protection Board (*Raad voor Kinderbescherming*). The Board will then be able to carry out a judicial screening of the host family.<sup>20</sup>

### *Children's well-being and needs*

Nidos will, during the intake with both unaccompanied children and accompanied children, address the child's well-being and needs.<sup>21</sup> For this, the Nidos guardian always looks first at where the child comes from and what the situation of his or her family is. They also look into whether there are sleeping problems, whether the child goes to school, can concentrate etc. In this way it can be determined whether the child is suffering from any kind of trauma. Nidos uses interpreters when necessary. When Nidos suspects that a child has been in contact with the Child Protection authorities in Ukraine, the relevant file is requested from the Ukrainian authorities. If it concerns a child with a child protection order or serious developmental problems, the child is referred to the Child Care and Protection Board. An exception is the group of children with a (mental) disability or chronic illness. This group is referred to the William Schrikker Foundation (*William Schrikker Jeugdbescherming en*

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<sup>19</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen, zijn ze in beeld?](#)), page 18, Leiden, Defence for Children.

<sup>20</sup> The Netherlands, Association of Netherlands Municipalities (*Vereniging van Nederlandse Gemeenten*) (2022), Identification of minors from Ukraine. Guideline for municipalities ([Signalering van minderjarigen uit Oekraïne. Handreiking voor gemeenten](#)), The Hague, Association of Netherlands Municipalities.

<sup>21</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen, zijn ze in beeld?](#)).page 18, Leiden, Defence for Children.

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*Jeugdreclassering*), a Youth Protection Agency that works for children with a disability.<sup>22</sup>

## 2.1.2. Children evacuated from Ukrainian institutions

Four Ukrainian orphanages have come from Ukraine over to the Netherlands in their entirety (including staff and directors).<sup>23</sup> They have not been integrated into Dutch care institutions. The total number of children in the orphanages is 154.<sup>24</sup> These orphanages are accommodated at four different premises. All children from the same orphanage are housed on the same premise. Two premises are located in the municipality of Nederbetuwe (a former bank building and a former police building). One premise is located in the municipality of Breda ( a former housing facility). One premise is located in the municipality of Amersfoort (housing facilities of welfare organisation for people with a mental disability). All these premises have been adapted in order to house the children. These orphanages operate under Dutch law, so the Dutch authorities and inspectorates have access to these institutions. All orphanages have been established with involvement of the local community (civil society and municipality) Operating under Dutch law means the orphanages can be visited by responsible Inspectorates. No visits by the Inspectorates have been reported. No conflicts between the applicable Dutch law and the Ukrainian practices within the orphanages have been reported. The Ukrainian authorities also maintain supervision on these orphanages.<sup>25</sup>

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<sup>22</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen, zijn ze in beeld?](#)), page 18, Leiden, Defence for Children.

<sup>23</sup> Information provided by an official of Nidos, by an email sent on 13 June 2023.

<sup>24</sup> Information provided by an official of the Programme Directorate General Ukrainian Displaced Persons at the Ministry of Justice and Security in a telephone interview (14 June 2023).

<sup>25</sup> Information provided by an official of the Programme Directorate General Ukrainian Displaced Persons at the Ministry of Justice and Security in a telephone interview (14 June 2023).

## 2.2. Safeguards and measures addressing risk of violent crimes against children fleeing Ukraine

### 2.2.1. Safeguards to protect and defend children from crimes

No specific measures were adopted to protect and defend children fleeing Ukraine from violent crimes. We have contacted Comensha (Coordination Centre against Human Trafficking)<sup>26</sup> and the Ministry of Justice and Security<sup>27</sup>. Both informed us that no specific measures were adopted.

### 2.2.2. Support for children victims of crimes

In the Netherlands, there are no specialized support services for children victims of crime. Children can make use of the general support services for victims of crime. These services are free. We will describe these general support services below.

The most important organisation that supports victims of crime, including children, is Victim Support Netherlands (*Slachtofferhulp Nederland*).<sup>28</sup> It provides emotional support, helps victims to get compensation for damages, and support victims in the criminal justice process.

The regional Safe at Home organisations (*Veilig Thuis Organisaties*) act as the advice and reporting centres for child abuse and domestic violence and coordinate the support victims of child abuse and domestic violence.<sup>29</sup>

The Sexual Assault Center (*Centrum Seksueel Geweld*) is the organisation where victims of sexual violence can get all the help they need: forensic, medical and psychological help.<sup>30</sup>

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<sup>26</sup> Information provided by an official of Comensha, by an email sent on 12 June 2023.

<sup>27</sup> Information provided by an official of the Programme Directorate General Ukrainian Displaced Persons at the Ministry of Justice and Security in a telephone interview (14 June 2023).

<sup>28</sup> Victim Support Netherlands (*Slachtofferhulp Nederland*) (2023), [Website](#).

<sup>29</sup> Safe at Home (*Veilig thuis*) (2023), [Website](#).

<sup>30</sup> Centrum Seksueel Geweld (*Sexual Assault Centre*) (2023), [Website](#).

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Comensha is the national organisation that coordinates initial care, assistance and shelter for victims of human trafficking.<sup>31</sup>

The national Children's telephone (*Kindertelefoon*)<sup>32</sup> is a general support and information service for children and can support children who are victims of crime.

All these organisations do not address the specific needs of children fleeing Ukraine.

## 2.3. Guardianship/legal representation arrangements for unaccompanied and separated children fleeing Ukraine

### 2.3.1. Arrived unaccompanied

Under Dutch civil law, the court has the authority to appoint a guardian of a parent or a guardian. In cases where the parental guardian fails or is unable to exercise his or her authority, or where he or she is unknown, the court has the authority to appoint a guardian. In case of an unaccompanied child, whether from Ukraine or any other country, the court has the authority to appoint guardianship organisation Nidos as guardian on request of Nidos.<sup>33</sup> The guardianship is carried out by a guardian employed by Nidos. Nidos is funded by the Ministry of Justice and Security. Nidos only works as guardianship organisation for unaccompanied children and only in very exceptional circumstances for accompanied children.

Children fleeing Ukraine fall under the same guardianship system as other third-country national children but due to the decentralised nature of the reception system for persons fleeing Ukraine (in contrast with the regular reception system for people seeking asylum) some arrangements between the municipalities and Nidos had to be made.<sup>34</sup> This happened in June 2022. The Association of Netherlands Municipalities

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<sup>31</sup> Comensha (2023), [Website](#).

<sup>32</sup> Foundation Children's Telephone (*Stichting De Kindertelefoon*) (2023), [Website](#).

<sup>33</sup> The Netherlands, Civil Code (*Burgerlijk Wetboek*), [Book 1, Article 256](#).

<sup>34</sup> The Netherlands, Nidos (2023), 'Ukrainian unaccompanied children and reception' ([Oekraïense AMV's + Opvang](#)), web page.

published a special guideline about these agreements.<sup>35</sup> The Ministry of Justice and Security describes these agreements in a general guideline that is regularly updated.<sup>36</sup> These guidelines foresee in the arrival of unaccompanied children fleeing Ukraine.

A summary of the arrangements made by the Association of Netherlands Municipalities and Nidos: If the local or regional authorities (a Safety Region or a municipality) identify an unaccompanied child from Ukraine (at a hub, at a reception centre, in a host family or at the registration in the Personal Records Database), the authorities must contact guardianship institution Nidos immediately.<sup>37</sup> Nidos then conducts an intake with the child, if possible also remotely with parents, and assesses whether applying for temporary guardianship is appropriate. The municipality can report the child to Nidos through a dedicated telephone number or email address. When Nidos determines that applying for temporary guardianship is appropriate, it will submit an application to the court. Nidos looks at several factors to determine whether it will submit an application to the court.<sup>38</sup> Nidos considers the age of the child, whether parent(s) are present outside the Netherlands, whether contact is possible between child and parent, whether the parents are able to exercise their authority, and the opinions of the child and parent(s).

If this application is granted by the court, Nidos will carry out the guardianship until the parents can take over again.

To date, Nidos has been charged with temporary guardianship in some 150 cases of children fleeing Ukraine.<sup>39</sup> Some of these guardianships have since been terminated, for example because the child came of age or because the minor returned to Ukraine. Currently (14 June 2023), Nidos is in charge of temporary guardianship for 125 Ukrainian children. There are still 12 applications pending before the court and some 100 children are still under assessment by Nidos.<sup>40</sup> For all minors notified to Nidos where no request for temporary guardianship as gone to court, in most cases,

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<sup>35</sup> The Netherlands, Association of Netherlands Municipalities (*Vereniging van Nederlandse Gemeenten*) (2022), Identification of minors from Ukraine. Guideline for municipalities ([Signalering van minderjarigen uit Oekraïne. Handreiking voor gemeenten](#)).

<sup>36</sup> The Netherlands, Ministry of Justice and Security (*Ministerie van Justitie en Veiligheid*) (2023), *Manual Municipal Reception Ukrainians*. Version 7.0. 24-02-2023. ([Handreiking Gemeentelijke Opvang Oekraïners. Versie 7.0. 24-02-2023](#)).

<sup>37</sup> The Netherlands, Nidos (2023), 'Ukrainian unaccompanied children and reception' ([Oekraïense AMV's + Opvang](#)), web page.

<sup>38</sup> Information provided by an official of Nidos, by an email sent on 13 June 2023.

<sup>39</sup> Information provided by an official of Nidos, by an email sent on 13 June 2023.

<sup>40</sup> Information provided by an official of Nidos, by an email sent on 13 June 2023.

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custody is exercised by the parent(s) in Ukraine and daily care is carried out by an adult appointed by the parent(s).<sup>41</sup>

Nidos is responsible for the reception of unaccompanied children placed under its guardianship by the courts and will place the children fleeing Ukraine in a foster family or in a small scale facility.<sup>42</sup>

### 2.3.2. Arrived without parents, but with other family members, neighbours or family friends

There is a difference in the Dutch system between the arrangements for unaccompanied children and the arrangements for accompanied children. In the latter system guardianship organisation Nidos plays a smaller role.

Diverging from the treatment of unaccompanied children as detailed in the previous paragraph, when local or regional authorities identify a child accompanied by one or more adults who are not his or her parent, they will first conduct an investigation into the formal relations between the child and the accompanying adult (by checking identity documents and other official documents).<sup>43</sup> Then the authorities will contact guardianship institution Nidos, by use of the dedicated phone number or email address mentioned before. Nidos makes an assessment whether the adult accompanying the child is able to supervise the child.<sup>44</sup> Following this assessment and if the adult accompanying the child is deemed unable to supervise the child, Nidos will submit a request for guardianship to the court, but only if the added value of this is recognised by the accompanied child.<sup>45</sup> If this allocation is granted by the court, Nidos will carry out the guardianship until the parents can take over again. The guardianship is carried out by a guardian employed by Nidos. Nidos is funded by the Ministry of Justice and Security. Nidos is also responsible for placing the child allocated under its in

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<sup>41</sup> Information provided by an official of Nidos, by an email sent on 13 June 2023.

<sup>42</sup> The Netherlands, The Netherlands, Central Agency for the Reception of Asylum Seekers (Centraal Orgaan opvang asielzoekers) (2023), '[Unaccompanied minors](#)', Web page.

<sup>43</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen,zijn ze in beeld?](#)), page 17, Leiden, Defence for Children.

<sup>44</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ? ([Oekraïense kinderen,zijn ze in beeld?](#)), page 18, Leiden, Defence for Children.

<sup>45</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ? ([Oekraïense kinderen,zijn ze in beeld?](#))page 18, Leiden, Defence for Children.

guardianship in care. Care will be a foster family or a small-scale facility administered by Nidos.

If the child stays with the accompanying adult in a host family, Nidos reports this to the Child Care and Protection Board (*Raad voor Kinderbescherming*).<sup>46</sup> The Board will then be able to carry out a judicial screening of the host family.

Due to the decentralised system for persons fleeing from Ukraine (in contrast to the regular system for people seeking asylum), special procedural agreements have been made between Nidos and the Association of Netherlands Dutch Municipalities (*Vereniging voor Nederlandse Gemeenten*) on unaccompanied and accompanied children fleeing Ukraine.<sup>47</sup> This happened in June 2022. These procedural agreements deal with the identification and intake of unaccompanied children by Nidos and the Association of Netherlands Municipalities. Nidos describes these procedural arrangements on its website.<sup>48</sup> The Association of Netherlands Municipalities published a special guidelines about the agreements.<sup>49</sup> The Ministry of Justice and Security describes these agreements in a general guideline that is regularly updated.<sup>50</sup> These guidelines foresee in the arrival of children accompanied by one or more adult(s) other than their parent(s).

### 2.3.3. Arrived within a group, from Ukrainian institution or foster carers (with or without an appointed legal guardian)

Four orphanages have come over to the Netherlands in their entirety (including staff and director).<sup>51</sup> According to Ukrainian law, the director of the orphanage travelling

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<sup>46</sup> The Netherlands, Association of Netherlands Municipalities (*Vereniging van Nederlandse Gemeenten*) (2022), Identification of minors from Ukraine. Guideline for municipalities ([Signalering van minderjarigen uit Oekraïne. Handreiking voor gemeenten](#)).

<sup>47</sup> The Netherlands, Association of Netherlands Municipalities (*Vereniging van Nederlandse Gemeenten*) (2022), Identification of minors from Ukraine. Guideline for municipalities ([Signalering van minderjarigen uit Oekraïne. Handreiking voor gemeenten](#)).

<sup>48</sup> The Netherlands, Nidos (2023), 'Ukrainian unaccompanied children and reception' ([Oekraïense AMV's + Opvang](#)), web page.

<sup>49</sup> The Netherlands, Association of Netherlands Municipalities (*Vereniging van Nederlandse Gemeenten*) (2022), Identification of minors from Ukraine. Guideline for municipalities ([Signalering van minderjarigen uit Oekraïne. Handreiking voor gemeenten](#)).

<sup>50</sup> The Netherlands, Ministry of Justice and Security (*Ministerie van Justitie en Veiligheid*) (2023), *Manual Municipal Reception Ukrainians*. Version 7.0. 24-02-2023. ([Handreiking Gemeentelijke Opvang Oekraïners. Versie 7.0. 24-02-2023](#)).

<sup>51</sup> Information provided by an official of Nidos, by an email sent on 13 June 2023.

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with them is the guardian of these children. The Dutch government follows this Ukrainian guardianship construction which means that no interference from Nidos is necessary in these situations.

Apart from that, there are very few cases where children who had been placed in foster families in Ukraine have arrived with those foster families (including their guardians) in the Netherlands. (these foster families are comparable to the Dutch family homes or *gezinshuizen*).<sup>52</sup> After notification of these children, a similar consideration follows as reported in 2.3.2. If the guardianship situation is not adequately arranged from Ukraine, Nidos can proceed to request the court to be charged with temporary guardianship.<sup>53</sup>

#### **2.3.4. Arrived within a group, through private initiatives, such as football clubs (with or without an appointed legal guardian)**

No cases have been documented about children arrived within a group, through private initiatives. Special procedural agreements have been drawn up by Nidos and the Association of Netherlands Municipalities (*Vereniging voor Nederlandse Gemeenten*) on unaccompanied children fleeing Ukraine and specified in guidelines.<sup>54</sup> These guidelines do not mention the arrival of children within a group through private initiatives. In all likelihood, the arrangements as described under 2.3.2 will apply. The Ministry of Justice and Security advises against such private initiatives.<sup>55</sup>

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<sup>52</sup> Information provided by an official of Nidos, by an email sent on 13 June 2023.

<sup>53</sup> Information provided by an official of Nidos, by an email sent on 13 June 2023.

<sup>54</sup> The Netherlands, Nidos (2023), 'Ukrainian unaccompanied children and reception' ([Oekraïense AMV's + Opvang](#)), web page.

<sup>55</sup> Information provided by an official of the Ministry of Justice and Security on 12 June 2024 by email.



## 2.4. Placement of unaccompanied and separated children fleeing from Ukraine

**Table 3 – Placement of unaccompanied and separated children**

Type of placement	Number of children	Details
With adult relatives	900	This figure is an estimate. Nidos does not differentiate between the categories 'With adult relatives' and 'With person who looked after the child when fleeing', so this number relates to both categories.
With a foster family	50	This figure is an estimate.
With person who looked after the child when fleeing	Not available	Nidos does not differentiate between the categories 'With adult relatives' and 'With person who looked after the child when fleeing'.
In reception centres for unaccompanied children (all nationalities)	0	
In reception centres for children fleeing Ukraine	40	This figure is an estimate.
Other placement	200	This figure is an estimate. This figure relates to orphanages and Ukrainian foster families who fled to the Netherland

Source: Nidos, information provided by email sent on 13 June 2023..

## 2.5. Children evacuated from Ukrainian institutions

### 2.5.1. Institutional placements

Four orphanages have come over to the Netherlands in their entirety (including director and staff).<sup>56</sup> The total number of children in the orphanages is 154. These children are children with disabilities. These orphanages are accommodated at four different premises. All children from the same orphanage are housed on the same premise. Two premises are located in the municipality of Nederbetuwe (a former bank building and a former police building). One premise is located in the municipality of Breda (a former housing facility). One premise is located in the municipality of Amersfoort (housing facilities of welfare organisation for people with a mental disability). All these premises have been adapted in order to house the children.

### 2.5.2. Alternative care

The Ukrainian institutions have come over to the Netherlands in their entirety (including director and staff). So all the children evacuated from the Ukrainian institutions in question are housed in the same premises. No efforts and initiatives to place children evacuated from Ukrainian institutions in alternative community-based settings have taken place.

### 2.5.3. Safeguards for children placed in institutional care settings

The Ukrainian institutions operate under Dutch legislation so the same safeguards apply as for Dutch institutions.<sup>57</sup> Dutch authorities have oversight. They have the authority to visit the locations but no visits have been reported. At the same time, the Ukrainian institutions have come over to the Netherlands in their entirety (including

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<sup>56</sup> Information provided by an official of the Programme Directorate General Ukrainian Displaced Persons at the Ministry of Justice and Security in a telephone interview (14 June 2023).

<sup>57</sup> Information provided by an official of the Programme Directorate General Ukrainian Displaced Persons at the Ministry of Justice and Security in a telephone interview (14 June 2023).

director and staff) and the Ukrainian authorities continue to supervise the institutions in the Netherlands.<sup>58</sup>

#### 2.5.4. Access to local services and support

Children evacuated from Ukrainian institutions have access to local services (including education and health service) and support (including youth support).<sup>59</sup>

## 2.6. Child-friendly information and means to ensure participation of children from Ukraine

### 2.6.1. Child friendly information

Hardly any child-friendly information is published for children from Ukraine. The Ombudsman for Children (*Kinderombudsman*)<sup>60</sup>, the Child Care and Protection Board (*Raad voor de Kinderbescherming*)<sup>61</sup>, the Safe at Home organisations (*Veilig Thuis Organisaties*) that act as the advice and reporting centres for child abuse and domestic violence<sup>62</sup>, and the national Children's telephone (*Kindertelefoon*)<sup>63</sup> have not published any child-friendly materials for children from Ukraine.

The only organisation that published child friendly information is Pharos (a knowledge centre on health disparities). Pharos published brochures with visual stories in Ukrainian and Russian (in a child friendly manner) about trauma's and depressions.<sup>64</sup>

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<sup>58</sup> Information provided by an official of the Programme Directorate General Ukrainian Displaced Persons at the Ministry of Justice and Security in a telephone interview (14 June 2023).

<sup>59</sup> Information provided by an official of the Programme Directorate General Ukrainian Displaced Persons at the Ministry of Justice and Security in a telephone interview (14 June 2023).

<sup>60</sup> The Netherlands, Ombudsman for Children (*Kinderombudsman*) (2023), [Website](#).

<sup>61</sup> The Netherlands, Child Care and Protection Board (*Raad voor de Kinderbescherming*) (2023), [Website](#).

<sup>62</sup> Safe at Home (*Veilig thuis*) (2023), [Website](#).

<sup>63</sup> Foundation Children's Telephone (*Stichting De Kindertelefoon*) (2023), [Website](#).

<sup>64</sup> Pharos (2022), 'New: Ukrainian and Russian visual stories on mental health issues', ([Nieuw: Oekraïense en Russische beeldverhalen over psychische problemen](#)), web page.

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## 2.6.2. Child participation

No initiatives to ensure and facilitate child participation for children fleeing Ukraine found.

We have checked the websites of organisations involved in the Dutch child participation system: the Dutch National Youth Council (*Nationale Jeugdraad*)<sup>65</sup>, the Hague Youth Ambassadors (*Haagse Jeugdambassadeurs*)<sup>66</sup>, Youth Platform Amsterdam (*Jeugdplatform Amsterdam*)<sup>67</sup>, Jong010 Youth Council Rotterdam (*Jong010 jongerenadviesraad van Rotterdam*)<sup>68</sup>, Alexander Foundation<sup>69</sup>, and the Netherlands Youth Institute (*Nederland Jeugdinstituut*)<sup>70</sup>.

We would like to stress that no legally mandated system for child participation at national, regional or municipal level exists in the Netherlands.

Students in secondary education can participate in the participation councils (*medezeggenschapsraden*). But no initiatives facilitating inclusion of students from Ukraine have been implemented.

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<sup>65</sup> National Youth Council (*Nationale Jeugdraad*) (2023), [Website](#).

<sup>66</sup> The Hague Youth Ambassadors (*Haagse Jeugdambassadeurs*) (2023), [Website](#).

<sup>67</sup> The Youth Platform Amsterdam (*Jeugdplatform Amsterdam*) (2023), [Website](#).

<sup>68</sup> Jong010 Youth Council Rotterdam (*Jong010 jongerenadviesraad van Rotterdam*) (2023), [Website](#).

<sup>69</sup> Alexander Foundation (*Stichting Alexander*) (2023), [Website](#).

<sup>70</sup> Netherlands Youth Institute (*Nederlands Jeugdinstituut*) (2023), [Website](#).

## 3. Access to social rights

### 3.1. Access to health care

#### 3.1.1. Scope of medical care for children fleeing Ukraine

**Table 4 – Scope of medical care for children**

Scope of medical care for children	Y/N	Reference / details
Only emergency care/essential treatment of illnesses (Article 13.2 TPD)	Y	The Netherlands, Central Government ( <i>Rijksoverheid</i> ) (2023), Q&A for municipalities about Medical Care Scheme for Displaced Persons from Ukraine ( <a href="#">Q&amp;A voor gemeenten over Regeling Medische Ontheemden uit Oekraïne</a> ).
Complete medical check -up / health screening	Y	The Netherlands, Public Health Act ( <i>Wet Publieke Gezondheid</i> ), <a href="#">Article 5</a> .
Mental health screening (PTSD, depression, anxiety)	Y	The Netherlands, Public Health Act ( <i>Wet Publieke Gezondheid</i> ), <a href="#">Article 5</a> .
Vaccinations for children	Y	The Netherlands, National Institute for Public Health and the Environment ( <i>Rijksinstituut voor Volksgezondheid en Milieu</i> ) (2023), National vaccination programme

		( <a href="#">Rijksvaccinatieprogramma</a> ).
Mental health / psychosocial support	Y	The Netherlands, Youth Act (Jeugdwet), <a href="#">Article 3.1</a> .
Children with disabilities and those with chronic illnesses have access to the medical care needed	Y	The Netherlands, Social Support Act 2015 ( <i>Wet Maatschappelijke Ondersteuning 2015</i> ), <a href="#">Article 1.2.1</a> .  The Netherlands, Medical Care Scheme for Asylum Seekers ( <a href="#">Regeling Medische zorg Asielzoekers</a> ).

Source: Government websites.

In the Netherlands, all medical expenses (including emergency care and essential treatment of illnesses) made by displaced persons, including children, from Ukraine are reimbursed by the Medical Care Scheme for Displaced Persons from Ukraine (*Regeling Medische zorg Ontheemden uit Oekraïne*).<sup>71</sup> Displaced persons must be in possession of a Dutch Citizen Service Number (*Burgerservicenummer*) which they receive when they register at the national Personal Records Database (*Basisregistratie Personen*).<sup>72</sup> Emergency care and essential care to displaced persons who do not have a Citizen Service Number is still reimbursed by the CAK or *Centraal Administratie Kantoor* (Dutch organisation for financing of special health care costs and institutions) according to the Subsidy scheme for medically necessary care to uninsured persons (*Subsidieregeling medisch noodzakelijke zorg aan onverzekerden*).<sup>73</sup>

In the Netherlands, health screening of all children residing in the Netherlands, including children displaced from Ukraine is conducted by the Youth Health Care department of the Regional Health Services (*GGDs*) under the Public Health Act (*Wet Publieke Gezondheid*).<sup>74</sup> The Youth Health Care departments monitors the health,

<sup>71</sup> The Netherlands, Central Government (*Rijksoverheid*) (2023), Q&A for municipalities about Medical Care Scheme for Displaced Persons from Ukraine ( [Q&A voor gemeenten over Regeling Medische Ontheemden uit Oekraïne](#)).

<sup>72</sup> The Netherlands, Government of the Netherlands (2022), [Medical care for displaced persons from Ukraine](#).

<sup>73</sup> The Netherlands, Subsidy scheme for medically necessary care to uninsured persons ([Subsidieregeling medisch noodzakelijke zorg aan onverzekerden](#)).

<sup>74</sup> The Netherlands, Public Health Act (*Wet Publieke Gezondheid*), [Article 5](#).

growth and development of children aged 0 to 16 years old. It carries out regular check-ups from birth up until children are 16 years old. Where necessary it offers help or refers parents and children to the relevant care provider.

In the Netherlands, children from Ukraine are vaccinated against diseases such as polio, measles and rubella under the Netherlands' national immunisation programme.<sup>75</sup> The programme covers all children in the Netherlands.<sup>76</sup> The vaccines are free for everyone in the Netherlands, including persons and children displaced from Ukraine.

All children in the Netherlands, irrespective of their residence status, including children fleeing from Ukraine, have access to mental health and psychosocial support under article 1.3 of the Youth Act (*Jeugdwet*).<sup>77</sup> Under the Youth Act, clients receive a personal budget from the local authorities by which they can buy support or they receive the support in kind.

All children with disabilities and those with chronic illnesses have access to medical care under the Medical Care Scheme for Displaced Persons from Ukraine (*Regeling Medische zorg Ontheemden uit Oekraïne*).<sup>78</sup> Long-term support is provided to all children in the Netherlands, irrespective of their residence status, including children fleeing from Ukraine, under the Social Support Act 2015 (*Wet Maatschappelijke Ondersteuning 2015*)<sup>79</sup> and long-term care to refugee and displaced persons under the Medical Care Scheme for Asylum Seekers (*Regeling Medische zorg Asielzoekers*).<sup>80</sup>

### 3.1.2. Challenges in practical provision

A report of Defence for Children<sup>81</sup> (published in December 2022) identifies the following problems:

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<sup>75</sup> The Netherlands, Central Government (*Rijksoverheid*) (2023), '[Care and support for refugees from Ukraine. Vaccination](#)', Web page.

<sup>76</sup> The Netherlands, National Institute for Public Health and the Environment (*Rijksinstituut voor Volksgezondheid en Milieu*) (2023), '[Protect your child with vaccinations. National Immunisation Programme](#)'.

<sup>77</sup> The Netherlands, Youth Act (*Jeugdwet*), [Article 3.1](#).

<sup>78</sup> The Netherlands, Central Government (*Rijksoverheid*) (2023), Q&A for municipalities about Medical Care Scheme for Displaced Persons from Ukraine ( [Q&A voor gemeenten over Regeling Medische Ontheemden uit Oekraïne](#)).

<sup>79</sup> The Netherlands, Social Support Act 2015 (*Wet Maatschappelijke Ondersteuning 2015*), [Article 1.2.1](#) .

<sup>80</sup> The Netherlands, Medical Care Scheme for Asylum Seekers ([Regeling Medische zorg Asielzoekers](#)).

<sup>81</sup> Altling von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen,zijn ze in beeld?](#)).Leiden, Defence for Children.

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- because of a limited capacity and shortage of staff not every location of the crisis emergency shelters is able to offer a psychosocial intake;
- because of the decentralised way in which the reception of displaced persons from Ukraine is organised there are large differences between regions when it comes to the organisation and provision of care and shelter;
- there is no central registration system of displaced persons in which information can be properly processed and tracked;
- the Regional Health Services (*GGDs*) are not present in all reception facilities, so no standard medical intake takes place in most reception facilities.

A report by Pharos (a knowledge centre on health disparities) indicates that adults often do not know where to seek care for their children because of the differences between the Dutch health care system and the Ukrainian health and care system.<sup>82</sup>

### 3.1.3. Mental health and psychosocial support for children fleeing Ukraine

All children in the Netherlands, irrespective of their residence status (including children fleeing from Ukraine), have access to mental health and psychosocial support under article 1.3 of the Youth Act (*Jeugdwet*). At present the whole system under the Youth Act faces capacity problems because of financial shortages, labour market shortages, and an increased workload.<sup>83</sup> These capacity problems lead to waiting lists for children in need of support.

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<sup>82</sup> Koudijs, H. and Smal, E. (2022), In safe hands. An exploration of the health of and quality of care for Ukrainian refugees in the Netherlands (*In goede handen. Een verkenning naar de gezondheid van en kwaliteit van zorg voor Oekraïense vluchtelingen in Nederland*), Utrecht, Pharos.

<sup>83</sup> The Netherlands, Health and Youth Care Inspectorate / Inspectorate of Justice and Security ( *Inspectie Gezondheidszorg en Jeugd / Inspectie Justitie en Veiligheid*) (2022), 'Supervision Youth Protection Chain' (['Toezicht jeugdbeschermingsketen'](#)), Letter to the Minister for Legal Protection (Minister voor Rechtsbescherming) / State Secretary for Health, Welfare and Sport (Staatssecretaris van Volksgezondheid, Welzijn en Sport), 9 September 2022 ; The Netherlands Court of Audit (*Algemene Rekenkamer*) (2023), Organised impotence. The role of central government in youth protection ([Georganiseerde onmacht. Over de rol van de rijksoverheid bij de jeugdbescherming](#)).



## 3.2. Access to education

### 3.2.1. Types of schooling

In the Netherlands, all children must attend school from age 5 until the end of the school year in which they turn 16.<sup>84</sup> This includes refugee children and children of foreign nationals. Children aged 16 and 17 must also attend school if they have not yet obtained a basic qualification. Parents can enrol their child at one or more schools.<sup>85</sup>

**Table 5 – Enrolment and attendance of children fleeing Ukraine**

Types of schooling		Number of children enrolled	Number of children attending	Source
National formal educational system	Children in nursery	Not applicable		In the Netherlands the nurseries are not part of the formal school system, at the same time children are able to attend primary schools from age 4 (it is obligatory from age 5).
	Children in primary education (4-12 years)	11,200	Not available	Source. <sup>86</sup>
	Children in secondary education	7,400	Not available	Source. <sup>87</sup>

<sup>84</sup> The Netherlands, Compulsory Education Act (*Leerplichtwet 1969*), [Articles 2-4c](#).

<sup>85</sup> The Netherlands, Ministry of Education, Culture and Science (*Ministerie van Onderwijs, Cultuur en Wetenschap*) (2023), [How does primary education work in the Netherlands?](#)

<sup>86</sup> The Netherlands, (2023), The Netherlands, Ministry of Education Culture and Science (*Ministerie van onderwijs Cultuur en Wetenschap*) (2023) Weekly review of Ukrainian pupil and student enrollment in schools ([Weekoverzicht inschrijving Oekraïense leerlingen op scholen](#)), 8 May 2023.

<sup>87</sup> The Netherlands, (2023), The Netherlands, Ministry of Education Culture and Science (*Ministerie van onderwijs Cultuur en Wetenschap*) (2023) Weekly review of Ukrainian pupil and student enrollment in schools ([Weekoverzicht inschrijving Oekraïense leerlingen op scholen](#)), 8 May 2023.

Physical attendance of Ukrainian led school / educational setting Primary education	43% of the primary schools pupils and 89% of the secondary school students are enrolled in a newcomer facility, or a temporary education facility.		Source. <sup>88</sup>
Online attendance of Ukrainian led school / educational setting	Not available.		

Source: The Netherlands, Ministry of Education Culture and Science (*Ministerie van onderwijs Cultuur en Wetenschap*) (2023) Weekly review of Ukrainian pupil and student enrollment in schools ([Weekoverzicht inschrijving Oekraïense leerlingen op scholen](#)), 8 May 2023.

In primary and secondary education, children fleeing Ukraine are integrated in the Dutch school system in three different ways:<sup>89</sup>

- (1) In specialised transitional education facilities for migrant and refugee children: newcomer facilities (*nieuwkomersvoorzieningen*) in primary education and international transitional classes (*Internationale Schakelklas*) in secondary education.
- (2) In temporary education facilities (*tijdelijke onderwijsvoorzieningen*) set up for displaced children from Ukraine by primary and secondary schools. Such a facility can consist of a separate class or section in an existing school, or a separate location.
- (3) In mainstream primary and secondary education.

43% of the Ukrainian primary schools pupils (in table 5) attend a specialised transitional education facility or a temporary education facility and 89% of the secondary schools students (in table 5) attend a specialised transitional education facility or a temporary education facility.<sup>90</sup>

All specialised transitional education facilities for newcomers and temporary education facilities for Ukrainian children offer extra language lessons in Dutch as a second

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<sup>88</sup> The Netherlands, (2023), The Netherlands, Ministry of Education Culture and Science (*Ministerie van onderwijs Cultuur en Wetenschap*) (2023) Weekly review of Ukrainian pupil and student enrollment in schools ([Weekoverzicht inschrijving Oekraïense leerlingen op scholen](#)), 8 May 2023.

<sup>89</sup> The Netherlands, Ministry of Education, Culture and Science (*Ministerie van Onderwijs, Cultuur en Wetenschap*) (2023), Manual for Education for children and young people from Ukraine ([Handreiking onderwijs voor kinderen en jongeren uit Oekraïne](#)).

<sup>90</sup> The Netherlands, (2023), The Netherlands, Ministry of Education Culture and Science (*Ministerie van onderwijs Cultuur en Wetenschap*) (2023) Weekly review of Ukrainian pupil and student enrollment in schools ([Weekoverzicht inschrijving Oekraïense leerlingen op scholen](#)), 8 May 2023.

language and support the social and emotional wellbeing of children.<sup>91</sup> Any school may choose to provide additional instruction in other languages than Dutch, for example English or Ukrainian. In the temporary educational facilities for pupils from Ukraine, in principle one third of the school time should be spent on learning the Dutch language, at least one third on other subjects from the mainstream curriculum (this can be taught in another language than Dutch, e.g. Ukrainian or English) and remaining time can be allotted to other educational activities that promote the social and emotional well-being of the pupils.<sup>92</sup>

The specialised transitional education facilities for newcomers and temporary education facilities for Ukrainian children do not allow for social mixing with Dutch children. This aspect is not considered by the authorities. For example, the Manual for Education for children and young people from Ukraine (*Handreiking onderwijs voor kinderen en jongeren uit Oekraïne*) made by the ministry of Education for municipalities and school boards does not consider how to achieve social mixing : it does not mention the subject.<sup>93</sup> A report by the Inspectorate for Education on the temporary education facilities for Ukrainian children does not consider subject of social mixing between Ukrainian and Dutch children.<sup>94</sup>

The stay at the specialised transitional education facilities for newcomers and temporary education facilities is meant to be temporary: pupils and students must ultimately progress to mainstream education.<sup>95</sup> There are no fixed time limits.

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<sup>91</sup> The Netherlands, Ministry of Education, Culture and Science (*Ministerie van Onderwijs, Cultuur en Wetenschap*) (2023), Manual for Education for children and young people from Ukraine ([Handreiking onderwijs voor kinderen en jongeren uit Oekraïne](#)).

<sup>92</sup> The Netherlands, Ministry of Education, Culture and Science (*Ministerie van Onderwijs, Cultuur en Wetenschap*) (2023), Manual for Education for children and young people from Ukraine ([Handreiking onderwijs voor kinderen en jongeren uit Oekraïne](#)).

<sup>93</sup> The Netherlands, Ministry of Education, Culture and Science (*Ministerie van Onderwijs, Cultuur en Wetenschap*) (2023), Manual for Education for children and young people from Ukraine ([Handreiking onderwijs voor kinderen en jongeren uit Oekraïne](#)).

<sup>94</sup> The Netherlands, Inspectorate of Education (*Inspectie van het Onderwijs*) (2023), Education of Ukrainian pupils and student in primary and secondary schools ([Onderwijs aan Oekraïense leerlingen in primair en voortgezet onderwijs](#)).

<sup>95</sup> The Netherlands, Ministry of Education, Culture and Science (*Ministerie van Onderwijs, Cultuur en Wetenschap*) (2023), Manual for Education for children and young people from Ukraine ([Handreiking onderwijs voor kinderen en jongeren uit Oekraïne](#)).

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### 3.2.2. Support to integration in the formal educational system

The National Government has several schemes which support schools<sup>96</sup> and municipalities<sup>97</sup> to integrate migrant and refugee children in the educational system. The reception of children fleeing Ukraine falls under these schemes. Besides these schemes the national government has implemented an additional act<sup>98</sup> and scheme<sup>99</sup> for integrating children fleeing Ukraine in the Dutch school system.

All specialised transitional education facilities for newcomers and temporary education facilities for Ukrainian children offer extra language lessons in Dutch as a second language<sup>100</sup>. Ukrainian children attending mainstream education get extra lessons in Dutch language.

In primary education, all schools receive an amount of about €11,000 per year for each pupil who is a newcomer to the Netherlands (refugee or migrant).<sup>101</sup> In secondary education, all schools receive an amount of about €12,300 per year for each pupil who is a newcomer to the Netherlands (refugee or migrant).<sup>102</sup>

In primary and secondary education, children fleeing from Ukraine are integrated in the Dutch school system in three different ways, as detailed in section 2.7.1: the

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<sup>96</sup> The Netherlands, National Government (*Rijksoverheid*) (2023), 'Financial schemes for schools', (['Financiële regelingen voor scholen'](#)), Web page.

<sup>97</sup> The Netherlands, National Government (*Rijksoverheid*) (2023), 'Financial schemes for schools', (['Financiële regelingen voor scholen'](#)), Web page.

<sup>98</sup> The Netherlands, Minister for Primary and Secondary Education / Minister for Justice and Security (*Minister voor Primair en Voortgezet Onderwijs / Minister van Justitie en Veiligheid*) (2022), Temporary Education Facilities Act in case of mass influx of displaced persons ([Wet tijdelijke onderwijsvoorzieningen bij massale toestroom van ontheemden](#)).

<sup>99</sup> The Netherlands, Temporary education facilities scheme in case of mass influx of displaced persons ([Regeling tijdelijke onderwijsvoorzieningen bij massale toestroom van ontheemden](#)), 1 August 2022.

<sup>100</sup> The Netherlands, Ministry of Education, Culture and Science (*Ministerie van Onderwijs, Cultuur en Wetenschap*) (2023), Manual for Education for children and young people from Ukraine ([Handreiking onderwijs voor kinderen en jongeren uit Oekraïne](#)).

<sup>101</sup> The Netherlands, National Government (*Rijksoverheid*) (2023), 'Financial schemes for schools', (['Financiële regelingen voor scholen'](#)), Web page.

<sup>102</sup> The Netherlands, National Government (*Rijksoverheid*) (2023), 'Financial schemes for schools', (['Financiële regelingen voor scholen'](#)), Web page.

specialised transitional education institutions, the temporary education facilities and in mainstream education institutions.<sup>103</sup>

Unlike the specialised facilities for newcomers (newcomer facilities or international transitional classes), which cater for newcomers from all around the world, the temporary education facilities have been created solely for children from Ukraine, to ensure that – despite the large influx from Ukrainian children - all children still have access to education. LOWAN, the knowledge centre that supports schools that provide education to newcomers, has indicated in a report by Defence of Children<sup>104</sup> that it prefers to include Ukrainian children in the existing newcomer facilities and only if there is insufficient capacity in those facilities to create temporary education facilities for pupils or students from Ukraine.

Under dedicated schemes, municipalities receive extra budget to fund school buildings for pupils and students from Ukraine<sup>105</sup>, to fund transport for pupils and student from Ukraine who are unable to travel to school independently<sup>106</sup> and to fund pre-school education for children fleeing Ukraine.<sup>107</sup>

### 3.2.3. Data on drop outs and NEETs (not in education, employment, or training)

A report by the Inspectorate for Education<sup>108</sup> (published on 21 June 2023) on the temporary education facilities for Ukrainian children found that ten per cent of the

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<sup>103</sup> The Netherlands, Ministry of Education, Culture and Science (*Ministerie van Onderwijs, Cultuur en Wetenschap*) (2023), Manual for Education for children and young people from Ukraine ([Handreiking onderwijs voor kinderen en jongeren uit Oekraïne](#)).

<sup>104</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen, zijn ze in beeld?](#)), page 20, Leiden, Defence for Children.

<sup>105</sup> The Netherlands, Minister for Primary and Secondary Education (*Minister voor Primair en Voortgezet Onderwijs*) (2022), Subsidy scheme for temporary educational accommodation for displaced persons ([Regeling specifieke uitkering tijdelijke onderwijshuisvesting ontheemden](#)).

<sup>106</sup> The Netherlands, National Government (*Rijksoverheid*) (2023), 'Financial schemes for schools', ([Financiële regelingen voor scholen](#)), Web page.

<sup>107</sup> The Netherlands, Minister for Primary and Secondary Education (*Minister voor Primair en Voortgezet Onderwijs*) (2022), Subsidy scheme for pre-school education for displaced toddlers ([Regeling specifieke uitkering voor de voorschoolse educatie aan ontheemde peuters](#)).

<sup>108</sup> The Netherlands, Inspectorate of Education (*Inspectie van het Onderwijs*) (2023), Education of Ukrainian pupils and student in primary and secondary schools ([Onderwijs aan Oekraïense leerlingen in primair en voortgezet onderwijs](#)).

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children from Ukraine are not enrolled in any school (14 percent of of primary school age children and 3 per cent of secondary school age children. <sup>109</sup>

### 3.3. Access to social welfare – forms of social assistance related to children

Displaced persons (adults and children) from Ukraine who have no employment are entitled to a subsistence allowance for food and clothing. They get their subsistence allowance from the municipality where they are registered. Until 1 February 2023, the allowance was €260 per person per month: €205 for food and €55 for clothing and other personal items. <sup>110</sup> In addition to these allowances, beneficiaries who have been placed with a host family also receive a so called ‘residential component’ of €215 per adult per month and €55 per child. When a person aged 18 or older takes up paid work, the subsistence allowance for all family members is stopped.

From 1 February 2023, the amounts of the monthly subsistence were decreased. For the new amounts see table X below.

**Table X Living allowances for displaced per month and person**

Age and family size	Clothing allowance	Food allowance	Extra allowance
Single adult or unaccompanied child	€ 56.12	€215.06	€ 93.00
Adult, 2-person family	€ 56.12	€215.06	€ 93.00
Adult, 3-person family	€ 56.12	€ 171.99	€ 93.00
Adult, 4-person or more family	€ 56.12	€ 150.45	€ 93.00
Child, 2-person family	€ 56.12	€ 178.36	€ 93.00
Child, 3-person family	€ 56.12	€ 142.57	€ 93.00
Child, 4-person or more family	€ 56.12	€ 124.97	€ 93.00

<sup>109</sup> Information provided by the Ministry of Education, Culture and Science on 15 June 2023.

<sup>110</sup> European Council on Refugees and Exiles (ECRE) (2023), [Temporary Protection Netherlands](#), Asylum Information Database (AIDA)

Source: The Netherlands, Ministry of Justice and Security (2023), [Living allowance for refugees from Ukraine. Changes from the 1st of February 2023](#).

In the explanatory note to the amendment of the allowance scheme, the government indicated that the amount of the monthly subsistence allowance had to be decreased due the fact that displaced persons (particularly families) received a considerably higher monthly allowance than asylum applicants and social welfare recipients in the Netherlands.<sup>111</sup>

Displaced persons from Ukraine who are in paid employment in the Netherlands are entitled to child benefit.<sup>112</sup> Child benefit is financial assistance towards meeting the costs of raising a child under the age of 18. The child benefit amounts for the second quarter of 2023 are: €269.76 for children aged 0 to 5 years, €327.56 for children aged 6 to 11 years, and €385.37 for children aged 12 to 17 years.<sup>113</sup>

The childcare services (which are private in the Netherlands) are available for working parents including working parents who are displaced persons from Ukraine. But under current law, displaced persons from Ukraine are not entitled to child-care benefits. On 15 June 2022, the National Government stated in a letter<sup>114</sup> to the House of Representatives that it intends to implement a new act which entitles displaced persons from Ukraine to child-care benefits. On 7 November 2022, a bill for was submitted to the House of Representatives.<sup>115</sup> This bill is still debated by the House of Representatives. In anticipation of this new act, advance payments are being made retrospectively to Ukrainian refugees who use childcare and comply with the conditions of the Childcare Act.<sup>116</sup>

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<sup>111</sup> The Netherlands, Minister for Justice and Security / State Secretary for Justice and Security (*Minister van Justitie en Veiligheid / Staatssecretaris van Justitie en Veiligheid*) (2022), Regulation of 24 November 2022, number 4295670, amending the Regulation on the Reception of Displaced Persons Ukraine ([Regeling van 24 november 2022, nummer 4295670, tot wijziging van de Regeling opvang ontheemden Oekraïne](#)).

<sup>112</sup> The Netherlands, General Child Benefit Act (Algemene Kinderbijslagwet), [Article 6](#).

<sup>113</sup> The Netherlands, Social Insurance Bank (Sociale Verzekeringsbank) (2023), ['Child benefit amounts'](#), Web page.

<sup>114</sup> The Netherlands, Minister of Social Affairs and Employment / State Secretary of Finance (*Minister van Sociale Zaken en Werkgelegenheid / Staatssecretaris van Financiën*) (2022), 'Entitlement of displaced Ukrainians to benefit', (['Aanspraak ontheemde Oekraïners op toeslagen'](#)), Letter to House of Representatives, 15 June 2022.

<sup>115</sup> The Netherlands, Minister of Social Affairs and Employment / State Secretary of Finance (*Minister van Sociale Zaken en Werkgelegenheid / Staatssecretaris van Financiën*) (2022) Bill for the Amendment to the Childcare Act to enable entitlement to childcare benefits for Ukrainian displaced persons ([Wijziging van de Wet kinderopvang om aanspraak op kinderopvangtoeslag mogelijk te maken voor Oekraïense ontheemden](#)).

<sup>116</sup> The Netherlands, Minister of Social Affairs and Employment / State Secretary of Finance (*Minister van Sociale Zaken en Werkgelegenheid / Staatssecretaris van Financiën*) (2022), 'Entitlement of displaced Ukrainians to benefit', (['Aanspraak ontheemde Oekraïners op toeslagen'](#)), Letter to House of Representatives, 15 June 2022.

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## 4. Additional legal and practical barriers and challenges

### 4.1. General challenges

A report by Defence for Children (published on 22 December 2022)<sup>117</sup> concludes from interviews with municipalities that not all children have access to education because there is a shortage of places. Their right to education is not always guaranteed.

This same report states the following about the decentralised approach of the reception of people fleeing Ukraine<sup>118</sup>: “Moreover, the central government must ensure that decentralisation does not unnecessarily create inequality between groups of children in different municipalities in terms of access to their rights (Article 2 UN Convention on the Rights of the Child). What we now observe in practice is that children do not always have access to education and care. We see that decentralisation leads to a lot of inequality between children when it comes to accessing rights. This is because every municipality regulates it differently and the education and care provision differs from one municipality to another. Finally, in practice, we see examples of municipal reception locations that are often not yet child-friendly.”

A report by the Inspectorate for Education<sup>119</sup> (published on 21 June 2023) on the temporary education facilities for Ukrainian children found that:

- the temporary education facilities face shortages of teachers in Dutch as a second language and teachers in other subjects
- Ukrainian pupils and students absent themselves relatively easily. This is related to the unclear future for the pupils and students and their parents, the focus on returning to Ukraine or wanting to follow distance learning provided from Ukraine
- only half of the temporary education facilities investigated have prepared so called

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<sup>117</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen, zijn ze in beeld?](#)), page 32, Leiden, Defence for Children.

<sup>118</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen, zijn ze in beeld?](#)), page 32, Leiden, Defence for Children.

<sup>119</sup> The Netherlands, Inspectorate of Education (*Inspectie van het Onderwijs*) (2023), Education of Ukrainian pupils and students in primary and secondary schools ([Onderwijs aan Oekraïense leerlingen in primair en voortgezet onderwijs](#)).



progression perspectives for pupils and students which set goals on how to progress to the regulatory education system.

The report is based on a large number of visits made by the Inspectorate of Education from 1 October 2022 to 1 February 2023 to a large number of temporary education facilities for Ukrainian pupils: 49 out of 117 in primary education and 18 out of 53 in secondary education. It is not a representative sample of schools.<sup>120</sup>

## 4.2. Challenges for children at multiple risk/disadvantage

A report by Defence for Children<sup>121</sup> concludes that the screening of children for vulnerabilities in the municipal reception centres and host families is still insufficient. It is often unclear who should carry out this screening. The regional and local approach to Ukrainian refugees means that the overarching view and overview, when it comes to screening for vulnerability and care needs, is often lacking. Besides, many schools are under much pressure due to a shortage of teachers (in the labour market in general) and the arrival of so many children.<sup>122</sup> Identifying the specific needs of this group of children requires knowledge and expertise that is not always present in every school. This means that not every child is properly screened for vulnerability and care needs.

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<sup>120</sup> The Netherlands, Inspectorate of Education (*Inspectie van het Onderwijs*) (2023), Education of Ukrainian pupils and student in primary and secondary schools ([Onderwijs aan Oekraïense leerlingen in primair en voortgezet onderwijs](#)).

<sup>121</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen, zijn ze in beeld?](#)), page 34, Leiden, Defence for Children.

<sup>122</sup> Alting von Geusau, M.C. (2022), Ukrainian children, are they in the picture? ([Oekraïense kinderen, zijn ze in beeld?](#)).page 32, Leiden, Defence for Children.

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## 5. Policies in place

### 5.1. Dedicated action plan and/or integrated measures

There is no action plan for the reception of displaced persons or children from Ukraine. The Ministry of Justice and Security coordinates the policies and measures with regard to the reception of displaced persons and children from Ukraine. In May 2022, the national government has created a special Programme Directorate General on Ukrainian Displaced Persons (*programma directoraat-generaal Oekraïense Ontheemden*) at the Ministry of Justice and Security.<sup>123</sup>

The national government regularly informs parliament about its policy measures towards the reception of displaced persons from Ukraine in special policy letters. The first of these was published on 8 March 2022<sup>124</sup> and the latest on 9 June 2023<sup>125</sup>. In these letters measures towards children fleeing from Ukraine are not singled out.

The national budget (*rijksbegroting*) contains a special annex on all additional expenditures related to the reception of displaced persons from Ukraine (including education and special schemes for children).<sup>126</sup>

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<sup>123</sup> The Netherlands, Minister for Justice and Safety (*Minister van Justitie en Veiligheid*) (2022), Organisational decision Ministry of Justice and Security in connection with establishment of Programme Directorate General Ukrainian Displaced Persons. ([Organisatiebesluit Ministerie van Justitie en Veiligheid in verband met instelling van het programmadirectoraat-generaal Oekraïense Ontheemden](#)).

<sup>124</sup> The Netherlands, State Secretary for Justice and Security (*Staatssecretaris van Justitie en Veiligheid*) (2022), 'Reception refugees from Ukraine' (['Opvang vluchtelingen uit Oekraïne'](#)), Letter to House of Representatives, 8 March 2022.

<sup>125</sup> The Netherlands, State Secretary for Justice and Security (*Staatssecretaris van Justitie en Veiligheid*) (2023), 'Letter reception Ukraine' (['Verzamelbrief opvang Oekraïne'](#)), Letter to House of Representatives, 9 June 2023.

<sup>126</sup> The Netherlands, Ministry of Finance (2022), National budget 2023. Expenditure review Ukraine ([Rijksbegroting 2023 Uitgavenoverzicht Oekraïne](#)).

## 5.2. European Child Guarantee

The national action plan for the European Child Guarantee does not include measures addressing children fleeing Ukraine.<sup>127</sup> It does not contain any reference to children fleeing Ukraine. Moreover, it does not address children with a migrant background as a separate group.

## 5.3. Budget

For the year 2023, the Netherlands Ministry of Finance has included in the Spring Memorandum 2023 (*Voorjaarsnota 2023*) all additional expenditures related to the reception of displaced persons from Ukraine.<sup>128</sup> A special annex of the memorandum is devoted to these expenditures. A total of €3.6 billion in spending is projected in 2023. Of this, €2.5 billion is for the reception and housing of displaced persons and €220 million for the medical care of displaced persons. A total of €544 million is projected for the education of displaced children: €191 million for newcomer education, €318 million for temporary accommodations, €14 million for preschool education and €21 million for the transport of pupils and students. €5 million is projected for guardianship organisation Nidos.

A total of €3.5 billion in spending is projected in 2024. Of this, €3 billion is for the reception and housing of displaced persons and €220 million for the medical care of displaced persons. A total of €97 is projected for the education of displaced children: €97 million for newcomer education. No sums are projected for temporary accommodations, for preschool education and for the transport of pupils and students. €5 million is projected for guardianship organisation Nidos.

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<sup>127</sup> The Netherlands, National Government (*Rijksoverheid*) (2022), [National Plan. Dutch situation regarding policy on child poverty in light of the Council recommendation establishing a European Child Guarantee](#).

<sup>128</sup> The Netherlands, Ministry of Finance (*Ministerie van Financiën*) (2023), Spring memorandum 2023, p. 191 ([Voorjaarsnota 2023](#)).

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## Annex 1 – Research and data

No survey or research has been conducted in the Netherlands focusing on the experiences of children who have fled Ukraine. The experiences of adults who have fled Ukraine have only been researched at local or regional level, not on national level. Therefore, we selected two regional surveys or studies on the experiences of adults who have fled Ukraine and summarise the findings of these surveys or studies as far as they relate to children.

**Table 6 – Research on experiences of children fleeing Ukraine**

Surveys or research studies on experiences of children fleeing Ukraine	
Name/title	Fled and Displaced: Ukrainian refugees in The Hague
Main findings (max. 1000 chars)	<p>Parents indicate that the children generally enjoy school; they get along well and make new friends. The children are mostly in classes with predominantly or exclusively other Ukrainian pupils or students. In doing so, some parents indicate that they miss contact with Dutch children and parents.</p> <p>It regularly happens that children not only follow education in the Netherlands, but also an online programme from Ukraine. Considerations that play a role in this are uncertainty about their future and differences between the Dutch and Ukrainian education systems and the wish to stay connected to education in Ukraine, should they decide to go back.</p> <p>Some parents indicate that their son or daughter would prefer to go back to Ukraine and, as a result, they do not have much interest in learning the Dutch language. Some of the respondents prefer to stay in the Netherlands.</p> <p>Some parents indicate that they sometimes worry or have worried about the mental health of their children.</p>
Highlight any findings re. gender, age, disability and diverse characteristics	No such findings found.
Methodology (for surveys/polls indicate sample size and sample method)	The fieldwork for this study took place from January to April 2023. In total, the researchers spoke to 27 Ukrainian displaced persons and 6 Dutch host families. 14 of the respondents came to the Netherlands with one or more children.

	<p>Respondents were recruited through the researchers' network, the municipality and online platforms such as the messaging service Telegram and neighbourhood app Nextdoor. The aim of the study was not to achieve a representative selection of respondents, but to have some diversity in the respondent population. This means that the researchers took care to have a diverse group in terms of age, gender, reception situation, family composition and language. The youngest respondent interviewed was 17 years old and the oldest 65 years old. The largest group of the respondents consisted of women who mostly fled with their children and were between 30-40 years old.</p>
Source	<p>Rusinovic, K. et al (2023), Fled and Displaced: Ukrainian refugees in The Hague (<a href="#">Ontvlucht en ontheemd: Oekraïense vluchtelingen in Den Haag</a>), The Hague, The Hague University of Applied Sciences</p>

**Table 7 – Research on experiences of children fleeing Ukraine**

Surveys or research studies on experiences of children fleeing Ukraine	
Name/title	The reception of Ukrainian refugees in Rotterdam. Experiences and Challenges
Main findings (max. 1000 chars)	<p>There is much (often unspoken) psychological suffering in adults and children. There are currently not enough Ukrainian and Russian-speaking professionals with a Dutch registration to work.</p> <p>Adult displaced prefer to stay in the area where they were first accommodated, because of work, social contacts or the children's school. When private reception ends, however, there are no guarantees that follow-up reception can be realised in the area where they were first accommodated.</p> <p>From April 2022 to June 2022, a temporary educational site had been opened in Rotterdam for Ukrainian children aged between 6 and 16 years old. The school worked with Dutch and Ukrainian teachers fleeing Ukraine. At the school, pupils were offered digital education by schools in Ukraine. In addition, a Dutch education programme was offered. The combination of Ukrainian lessons and the presence of Ukrainian teachers at one location was positively appreciated by parents. Parents indicated an interest in (partly) Ukrainian education and/or involvement of Ukrainian teachers.</p>
Highlight any findings re. gender, age, disability and	No such findings found.

diverse characteristics.	
Methodology (for surveys/polls indicate sample size and sample method)	<p>22 interviews with stakeholders from the municipality, civil society organisations, refugees and host families.</p> <p>A survey of Ukrainian refugees hosted on cruise ship 'De Volendam' that was anchored in Rotterdam from 6 April 2022 to 14 April 2022. People on this ship consisted mainly of women with children, families and elderly people.</p> <p>The survey was completed by 215 adults (169 women and 46 men). This makes the total response rate of the survey 29%. Of all women staying on the Volendam, 31% completed the survey, and of all men, 25% completed the survey. The average age of all respondents is 42.7. The average age of the men is slightly higher at 45.5. The average age of women is slightly lower at 41.9.</p>
Source	<p>De Gruijter, M., Sikkema, M. and Yohannes, R. (2022), The reception of Ukrainian refugees in Rotterdam. Experiences and Challenges. (<a href="#">De opvang van Oekraïense vluchtelingen in Rotterdam. Ervaringen en uitdagingen</a>), Utrecht, Verwey-Jonker Instituut.</p>

## Annex 2 - Promising practices

**Table 8 – Promising practice # 1**

Promising programme / practices aimed at providing protection and support to displaced children fleeing the war in Ukraine	
Name/title	Nidos
Implementing body (public authority, CSO etc)	CSO
Funding body	National Government
Reference in EN and original language (incl. URL, where available)	The Netherlands, Nidos (2023), 'Ukrainian unaccompanied children and reception' ( <a href="#">Oekraïense AMV's + Opvang</a> ), web page.
Start / end date or ongoing	Ongoing.
Main target group	Unaccompanied children
Scope (local/regional/national)	National
Objectives and outputs	Nidos is a national organisation that provides guardianship for unaccompanied (including unaccompanied children fleeing from Ukraine). To date, Nidos has been charged with temporary guardianship for children from Ukraine in some 150 cases. Some of these cases have since been terminated. At present, Nidos is in charge of temporary guardianship for 125 Ukrainian children. There are still 12 applications pending before the court and some 100 children are still under investigation by Nidos. <sup>129</sup>
Brief description (max. 1000 chars)	Nidos is an organisation that provides guardianship for unaccompanied children. Moreover, Nidos is responsible for the reception of unaccompanied children placed under its guardianship and will place the children fleeing Ukraine in a foster family or in a small scale facility. When the local or regional authorities identify an unaccompanied child from Ukraine, the authorities must contact Nidos immediately. Nidos will place the child in an

<sup>129</sup> Information provided by an official of Nidos, by an email sent on 13 June 2023.

	<p>emergency shelter and conduct an intake with the child, if possible also remotely with parents, and will assess whether it is necessary to apply for temporary guardianship. The local and regional authorities can report the child to Nidos through a dedicated telephone number or email address. When Nidos determines that applying for temporary guardianship is appropriate, it will submit an application to the court. If this guardianship application is granted by the court, Nidos will carry out the guardianship until the parents of the child can take over again.</p>
<p>Highlight key elements of the programme/practice which makes it promising (sustainability, measurable impact etc) (max. 500 chars)</p>	<p>There is one national organisation responsible for the guardianship of unaccompanied children funded by the government: Nidos.</p> <p>The relevant authorities contact Nidos when they come across an unaccompanied child at a hub, a reception facility or a host family.</p>
<p>Monitoring and evaluation and the bodies involved</p>	<p>Nidos operates under Dutch law. The organisation that monitors Nidos is the Health and Youth Care Inspectorate (<i>Inspectie Gezondheidszorg en Jeugd</i>).</p>

**Table 9 – Promising practice # 2**

Promising programme / practices aimed at providing protection and support to displaced children fleeing the war in Ukraine	
Name/title	Empatia
Implementing body (public authority, CSO etc)	CSO
Funding body	National government
Reference in EN and original language (incl. URL, where available)	Empatia (2023), ' <a href="#">About us</a> ', Web page.
Start / end date or ongoing	2023-
Main target group	Displaced persons from Ukraine (including parents and children)
Scope (local/regional/national)	National



Objectives and outputs	<p>Providing direct-online psycho-social support and information for displaced people via a hotline.</p> <p>Developing guidelines for Dutch Mental Healthcare Institutions.</p> <p>Matching Ukrainian psychologists with healthcare institutions and municipalities.</p> <p>Guiding psychologists from Ukraine through the process of credential evaluation</p> <p>Ensuring displaced Ukrainians are aware of, referred to and use the curative and psychosocial support services.</p> <p>Providing cultural specific advice to health services and municipalities also in form of training.</p>
Brief description (max. 1000 chars)	<p>Empatia is a mental health programme which aims to make mental healthcare more easily accessible to displaced persons from Ukraine. It does so by providing curative and preventive care for displaced people and maintaining hotline curative and preventive providing direct-online psycho-social support. It also supports Dutch authorities and mental health care institutions by giving advice and training and matches Ukrainian psychologists with healthcare institutions and municipalities. Empatia guides psychologists from Ukraine through the process of credential evaluation so they can work in the Netherlands.</p> <p>Empatia is involved in another programme: LOOP, an information, referral and advice centre for professionals and parties working with refugees (adults and children) from Ukraine (for example government bodies and care providers). They can address any questions on psychosocial care to LOOP.</p>
Highlight key elements of the programme/practice which makes it promising (sustainability, measurable impact ect) (max. 500 chars)	<p>Providing direct-online psycho-social support and information for displaced people via a hotline.</p> <p>Developing guidelines for Dutch Mental Healthcare Institutions.</p> <p>Matching Ukrainian psychologists with healthcare institutions and municipalities.</p> <p>Guiding psychologists from Ukraine through the process of credential evaluation</p> <p>Ensuring displaced Ukrainians are aware of, referred to and use the curative and psychosocial support services.</p>

	Providing cultural specific advice to health services and municipalities also in form of training.
Monitoring and evaluation and the bodies involved	<p>The programme operates under Dutch law. The organisation that monitors Nidos is the Health and Youth Care Inspectorate (<i>Inspectie Gezondheidszorg en Jeugd</i>).</p> <p>No evaluation foreseen.</p>