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SITUATIONAL REPORT

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The Ministry of Justice

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Who are we?

We are a group of high-skilled professionals-founders of the Displaced People Unit in the collaboration with the Foundation of Ukrainians in The Netherlands. We have been providing timely support to displaced Ukrainians since the first week of the full-scale invasion of the Russian Federation into Ukraine.

What has been achieved in the last two months?

- The launch of the website help-ukraine.nl, operative since the beginning of March and is regularly updated in order to provide all relevant information for Displaced people taking into account their cultural context and needs.
- The establishment of a telegram and email support line with the capacity of up to 200 calls a day.
- The creation of a database with 240 volunteer translators available across the whole country.
- The set up of a psychological support team with a database of 70+ Ukrainian psychologists. Consequently, providing psychological support (online and offline, support group) to up to 93 displaced people across the country.
- Two highly attended work webinars (400 persons participating in each) on how to find a job, create a CV and understand the job market/contracts in The Netherlands.
- A telegram channel (Ukrainian Diaspora in The Netherlands) with 11,500 subscribers as an individual informational initiative solution (*in partnership*).
- An available legal support team in Ukrainian.
- Effective advocacy on local, provincial and central governmental levels based on regular analysis of the identified needs and problems.
- Informational support and advocacy to our 19 regional coordinators according to each "safety region" (Dutch - *veiligeidregio*).
- Weekly and monthly need - assessment reports to provide effective response.
- News digest in the form of weekly newsletter (1,500 subscribers).
- Custom made contextual trainings on Ukrainian history, mentality, culture and effective humanitarian support strategies for governmental and nongovernmental stakeholders.

EXECUTIVE SUMMARY

In this report, we provide a **contextual and actual analysis** of the position of displaced Ukrainians in the Netherlands based on primary and secondary situational data gathered between the period of March-May 2022.

The purpose of this report is to provide an overview of the situation of the displaced people on the central and regional levels from **the Ukrainian** perspective: highlighting major developments and bottlenecks as well as proposing policy solutions where possible.

Although the **Dutch Government has welcomed and accommodated up to 50k Ukrainian displaced people***, on the regional level there is a lack of effective, flexible, and sustainable solutions on how to provide crisis and long-term support to Ukrainians who fled the war. This could be partly explained by the novelty, unexpectedness and unpredictability of the ongoing war which requires rapid responses and flexibility as well as by the insufficient cultural and contextual awareness.

Proximity and so-called “humanitarian exceptionalism”^{**} contributed to the reactive emotional support from Dutch nationals and expatriates which in the first weeks substituted the Governmental response, but is not sustainable in the long term. A good illustration were the disorganised and sporadic efforts led by Dutch families in hosting displaced Ukrainians in the first weeks of war which made it difficult, if not impossible to understand the needs, geographical distribution and psychological state of Ukrainians. Thus altogether, **ensuring physical and emotional safety** became very challenging. The delay in the implementation of the Directive, added to major discrepancies in local governmental responses (regional and municipal levels), and slow responses in satisfying material needs (financial allowance,

clothes, food) contributed to the appearance of major bottlenecks that could potentially lead to serious long-term consequences.

We identified the following **needs and bottlenecks** (deep dive and policy proposals are presented later in the report):

- **Inability to open bank accounts** for people who (1) do not have Ukrainian biometric documents (international passports and Ukrainian ID cards) or whose documents expired as well as for (2) the third nationals with Ukrainian residence permits (altogether, we estimate: 30% of all people who arrived in The Netherlands). Up to 6000 people have received the identification certificates from the embassy, but the document is not sufficient for the KYC in the Dutch banks (except for BUNQ which has recently started a pilot to accept the documents).
- **Discrepancies in how local governments are approaching education** for Ukrainian displaced people with a special concern for high school children. The latter are very close to achieving their Ukrainian high school diploma which is equivalent to the Dutch Havo Diploma* which could allow them to apply to university, however they are encouraged to join Dutch High Schools** (ISK classes) (e.g. in The Hague, Haarlem, and Amsterdam).
- **Information exchange.** The lack of effective and central communication channels that assist in spreading information in the community.
- **The implementation of the Temporary Directive by IND.** The IND has started taking appointments to attribute the stickers in passports, but it is not yet clear what the

*according to the *rijksoverheid* last updated 2.05.22)

**The term emerged in WWII to illustrate the increased attention to women and children who were in the center of humanitarian support

*See Nuffic

**In Haarlem children in their last year of high school are pushed to go to a Dutch High School, which ultimately means they need a foundation year to learn Dutch, and then 2 to 3 years to complete the Dutch Havo Diploma.

EXECUTIVE SUMMARY

temporary protection will entail in the Netherlands since all previous solutions were time-restricted or not specified.

- The inability to acquire self-employment status.** In the letter from the Dutch Government dated on the 30-3-2022, it was stated that in order to protect Ukrainians, the Government decided to restrict Ukrainian displaced people from starting their own businesses when the majority of female Ukrainian displaced people were active in providing a variety of services back home.*
- Prevalence of zero-hour contracts.** Our regional coordinators repeatedly reported that many Ukrainians who are engaged in the low-skilled labour are receiving zero-hour contracts that are insufficient to cover health insurance and other expenses. In the case of zero-hour contracts, the temporary government support for displaced people is suspended, even though the work is not guaranteed.
- Access to information depends on the placement.** The majority of our regional coordinators (especially in North Holland) highlighted that the access to information and benefits are dependent on where the displaced people are residing: private houses or hotels which contributes to inequality when it comes to the distribution of information and resources.
- Safety concerns for those in private accommodations.** From the first days of the invasion attention has been paid at the possibility of labour exploitation and harassment in private and governmental housing. We have received several reports about alleged labour exploitation, mistreatment and some signs of sexual harassment.
- Childcare in temporary and semi-permanent solutions.** Giving the current problem with childcare facilities in the Netherlands, all the current solutions regarding daycare for displaced Ukrainians are linked to the temporary housing facilities (hotels) (e.g. in Amsterdam) which are not sustainable.
- Discrepancies in the municipal support for displaced people.** This resulted in some municipalities not providing displaced persons with the assigned financial assistance (e.g., municipality of Dinkelland, Nieuwe Lekkerland, de Fryske Marren) and others covering all basic or long-term needs.* Some municipalities are reluctant to providing assistance to those without bank accounts.
- Recognition of the Ukrainian driving license.** If Ukrainians need to pass the exams, this will overload CBR which is already overloaded.** It has been reported that some can only use their Ukrainian driver's license for 180 days after obtaining a BSN.
- Psychological support.** There is a growing need for individual and group psychological support (according to the Report of the psychological department, Ukrainians in NL), yet there are not enough Ukrainian/Russian speaking specialists with a license. To be able to involve the ones who fled the war - there should be a possibility for a freelance based involvement.

The major bottlenecks outlined above point to the partial lack of effective crisis response (delays in social assistance payments), but also to a gradual need **to shift from basic needs to more strategic** or long-term solutions.

*according to ILOSTAT as of 2020.

* pending from April 27.

**see [CBR: Staff shortages lead to four-month wait for driving exams, 2022](#).

METHODOLOGY

This report was established by analysing primary and secondary data sources. This was done purposefully as the most critical issues and challenges are too recent yet to appear within secondary sources or research papers. Thus these are the sources used:

- Primary data for educational and work surveys were collected using the Central Telegram Channel (Ukrainian Diaspora The Netherlands, 11,500 subscribers) as well as the informational channels of regional coordinators (Telegram, Slack, and Whats' app chats) with a potential reach of 20,000 displaced Ukrainians (remains an estimate).
- Secondary data sets and reports, focused on original Ukrainian sources and research papers published before the wars (The reports from the State Service, CBS Nederland, UNLO Reports, UNDP Report).
- Hotline reports of the most critical problems.
- A round of interviews with regional coordinators and responsible department leaders (psychology and education) (20 interviews).

Having direct access to the Ukrainian ensures a quick, unique, and effective data collection process. It is to be noted that having Ukrainian nationals on the team has permitted an understanding of the specificities of Ukrainian culture which assists in the right interpretation of results, whereas the involvement of non-Ukrainian researchers in the production of the report (Nupur Joshi and Juliette Bonnepart) ensures the outsider's view and possible bias. Finally, different forms of data contributed to triangulation.

PORTRAIT OF UKRAINIANS IN THE NETHERLANDS

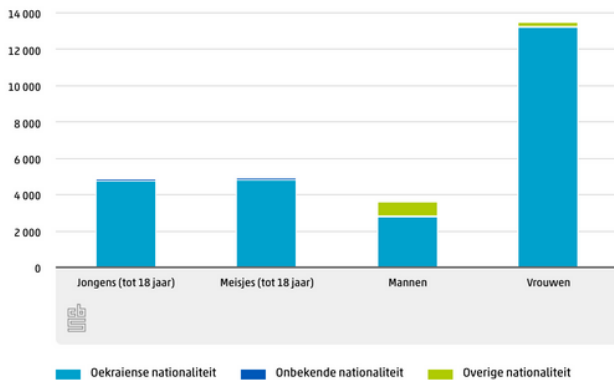


Fig 5.1. Registered Ukrainians between February 24th and April 7th 2022. Source: CBS.nl, "Vooral vrouwen en kinderen uit Oekraïne ingeschreven", 8-4-2022.

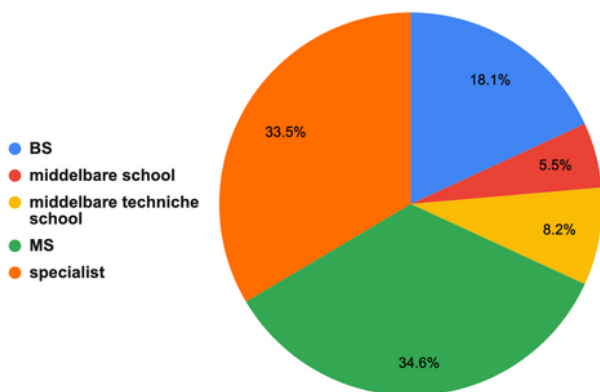


Fig 5.2. Educational level among Ukrainian displaced respondents in our survey. N:212

Our conducted survey among displaced Ukrainians in the Netherlands also indicates that at least 86% of respondents had at least a bachelor's degree.

The majority of people who crossed the border and have temporarily settled in the Netherlands are **young professional women with children** and are from the most affected regions of the war (Eastern, Southern, and Kyiv regions). Although it is challenging to get the full picture. With some exceptions, the Ukrainian Martial Law restricts the possibility for Ukrainian men in the age group of 18 to 60 to cross the border.*

According to the Central Bureau of Statistics (CBS), between February 24th and April 7th around **14k women and 10k children** (under 18 years old) have **registered in municipalities in the Netherlands**.

This distribution is in line with the study on the background of displaced people, conducted by the Razumkov research center in March 2022. The data was gathered from two border crossing points in Malyy Bereznyi and Chop (Ukraine's Zakarpattia region), they have a smaller sample size in comparison with the CBS findings, but this is what they indicate:

- The majority or 83% of those crossing are women, 63% of whom are fleeing with children.
- The biggest share are those in the age group of 30 - 39 years old.
- At least **26% of those arriving have completed higher education** (university).
- Most of the people crossing the border in March were **residents of Eastern, Central, and Southern regions, mostly affected by war**.
- 55% of displaced people experienced the war (it was happening in their places of residence, not just shelling, but actual fighting).
- 21% of the people fleeing take along their senior relatives.

*The Ukrainian Martial Law restricts the possibility for Ukrainian men in the age group from 18 to 60 to cross the border. However these are the following exceptions:

- Ukrainian men (18-60) who are deemed not suitable for military services by the relevant authorities.
- Ukrainian men (18-60) who have three or more children.
- Ukrainian men (18-60) with disabilities.
- Ukrainian (18-60) who are acting as legal guardians of disabled people and children.

See <https://ips.ligazakon.net/document/kp950057> for more information.

PORTRAIT OF UKRAINIANS IN THE NETHERLANDS

The **International Labour Organization** provides data on women's employment distribution by sector as well as by occupation in Ukraine as of 2020. The information provides that **50.1% the women population in Ukraine are highly skilled professionals**, working in scientific and technical activities, with 6% of the respondents occupying managerial positions.

In terms of employment sectors, as of 2020, women have mostly occupied jobs in wholesale and retail trade (22%), education (18.4%), and human health and social work (13%) activities, with a minority working in agriculture (3.5%) and heavy industries. In addition, most of the respondents occupied full-time positions, while in the Netherlands there is a significant amount of the population, who choose part-time jobs.

In comparison to their counterparts in the Netherlands, Ukrainian women work longer hours. **More than 70% of the Ukrainian women population works full-time.**

The portrait of Ukrainian displaced people who are spread across Europe, aligned with these described numbers, highlight several **important conclusions**:

- Ukrainians who flee are young professional women between 30 and 40 years old, with children.
- We estimate that they come from the most affected regions of the war (Kyiv, Eastern, and Southern regions) and therefore, their places of residence will not be restored in the nearest future.
- In Ukraine, a significant majority of women occupied full-time positions, predominantly within the trade, education, health, and social work sectors.

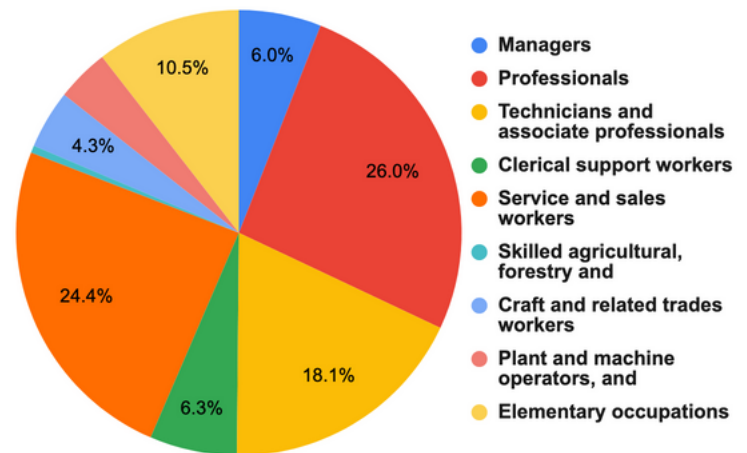


Fig 6.1. Women's Employment by Occupation. As of 2020. Source: ILOSTAT (International Labour Organization).

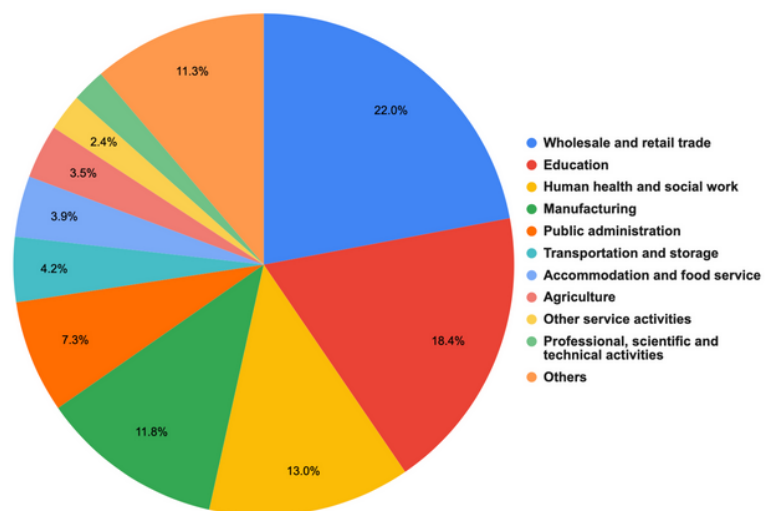


Fig 6.2. Women's Employment by Sectors. As of 2020. Source: ILOSTAT (International Labour Organization).

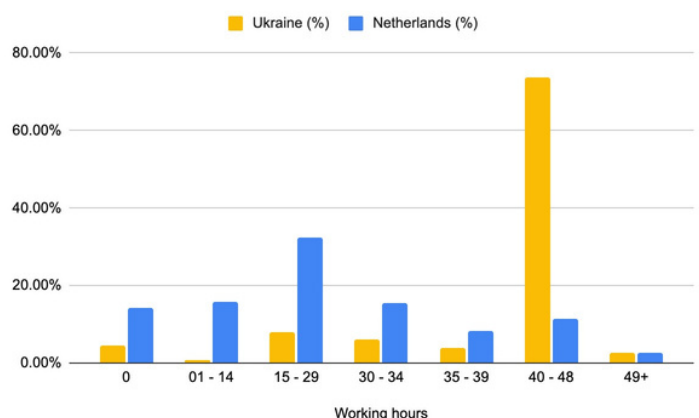
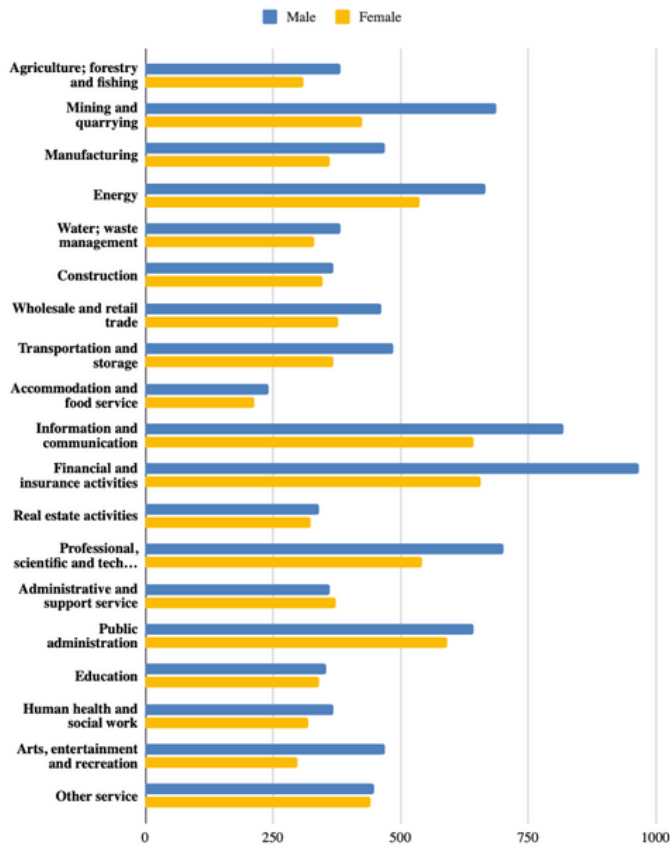


Fig 6.3. Working hours of women in Ukraine and the Netherlands. As of 2020. Source: ILOSTAT (International Labour Organization).

PORTRAIT OF UKRAINIANS IN THE NETHERLANDS

Gender equality

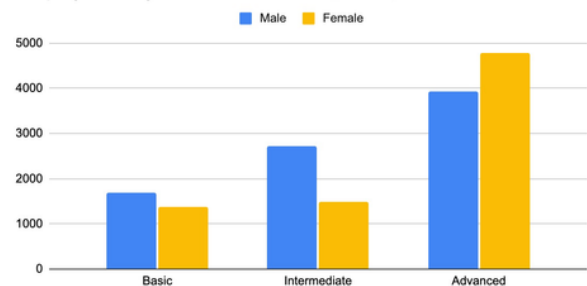
Mean nominal monthly earnings in Ukraine, in USD, as of 2020.



Unfortunately, Ukraine is not an easy place for women to live. Salaries are drastically different for women and men except within administrative services. Moreover, women usually carry the burden of child-caring combined with a full-time employment by themselves.

Encouraging the labour participation of female Ukrainians in The Netherlands could also contribute to gender equality which is highly appreciated in Western European states. The Netherlands has fought a long way toward a more gender-equal society, therefore, it could also serve as an encouragement and a chance for Ukrainians to reach the same result in the future.

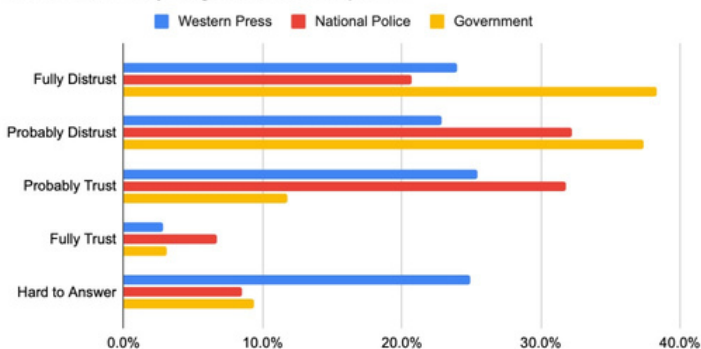
Employment by Education: Ukraine, 2020, in thousands.



Trust in institutions

Trust level of institutions among Ukrainians

Data collected in July - August 2021. 2019 responses.



Although we notice that there are governmental efforts in the Netherlands to reach out to Ukrainian displaced people, especially from police and municipal authorities, the level of trust that Ukrainians have towards authorities is to be considered. This is explained by years of governmental and institutional distrust and has contributed to an overall tendency to self-organisation and independence.

EVOLUTION OF NEEDS

We have made an overview of how the needs of Ukrainian Displaced people have evolved in the last two months.

The main observation is that the primary issues that displaced Ukrainian focused on, have developed from questions regarding their legal stay and housing possibilities to health problems, work permits, and diploma recognitions. Yet, some urgent, hot requests are present in all data sources - such as biometric documents to be able to open the bank account.

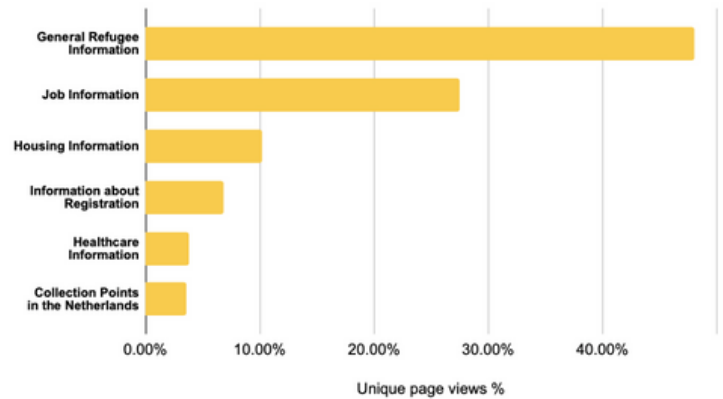
On the website, by looking at the number of clicks, the top searched pages are: housing, work, and health.

Most **requests for translations** are for medical documents and official diplomas. Before, they were mostly focused on everyday needs and identity documents.

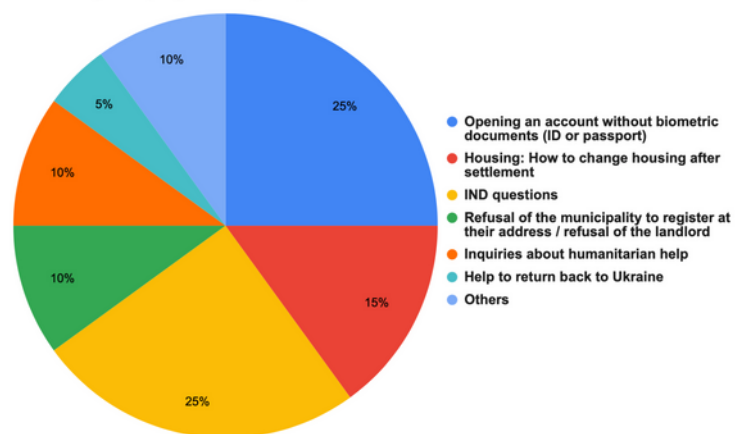
The frequency and content of **the email support, and hotline requests**, point to the fact that people find alternative information sources, and more are indeed covered. However, the most pressing issues remain bank accounts, housing options, BSN in the families, and humanitarian help.

The survey distributed in the weekly newsletter and our telegram channel pointed out similar dynamics when it comes to the evolution of needs.

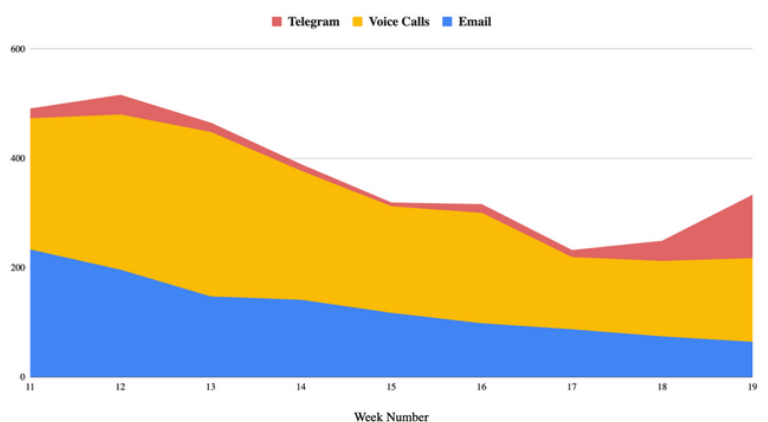
Unique page views at help-ukraine.nl



Share of requests (May 1st - May 12th)



Email, Telegram, Voice Calls



Friesland

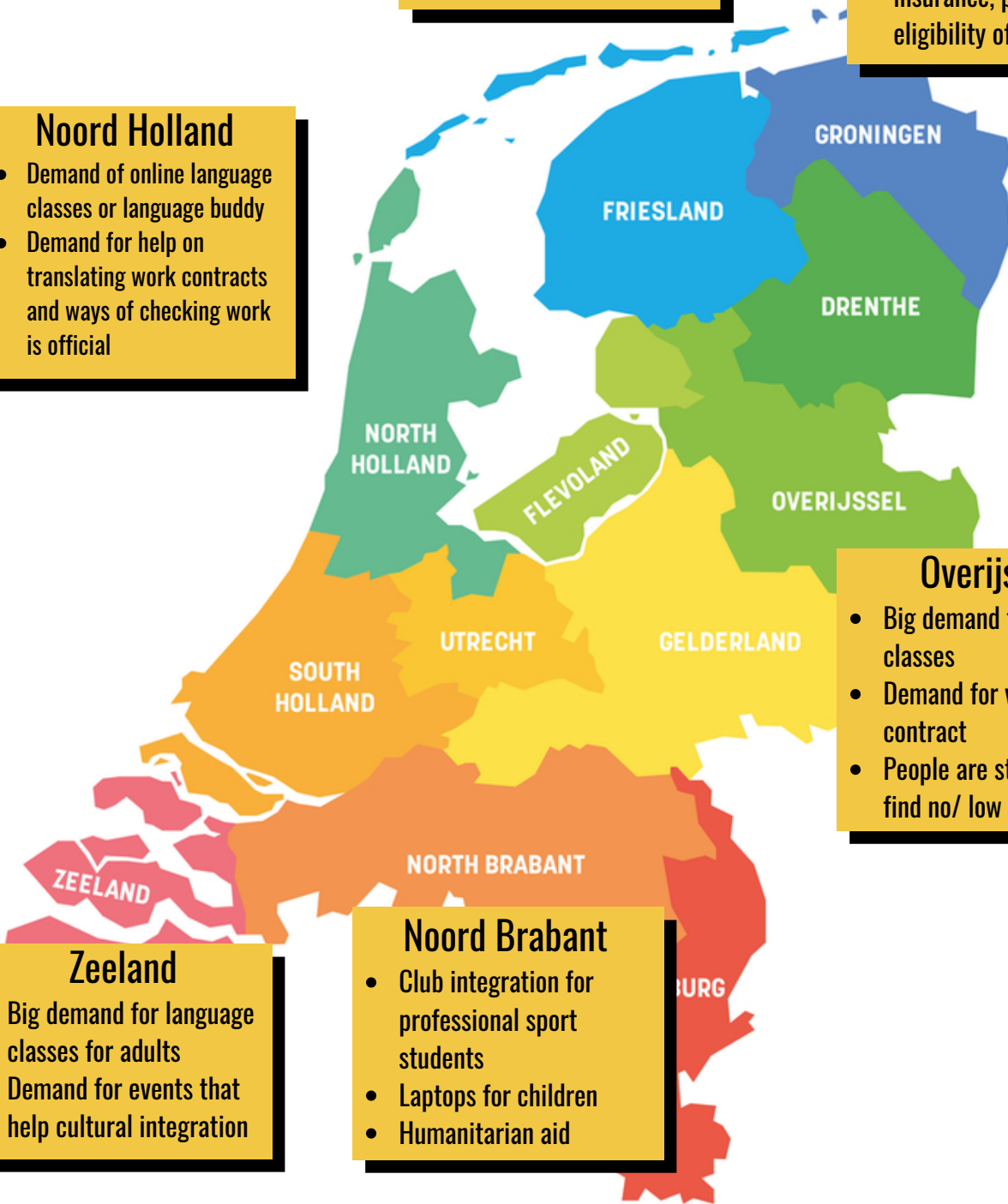
- Families with special conditions access to education
- Vulnerable families access to support

Groningen

- Car owners have questions about insurance, parking, and eligibility of license

Noord Holland

- Demand of online language classes or language buddy
- Demand for help on translating work contracts and ways of checking work is official



Overijssel

- Big demand for Dutch classes
- Demand for volunteer contract
- People are struggling to find no/ low cost clothes

Zeeland

- Big demand for language classes for adults
- Demand for events that help cultural integration

Noord Brabant

- Club integration for professional sport students
- Laptops for children
- Humanitarian aid

DEEP DIVES

1. UNEQUAL MUNICIPAL SUPPORT

Since the arrival of displaced Ukrainians, municipalities or gementee have been taking the lead in organising and implementing local support. According to Dutch law, they are responsible for housing, employment, welfare, public health, public order and safety, and education which are directly linked to the needs of displaced people.* This decentralised unitary system, has proven very successful in some cases where the reacting to providing vital and quick responses.

Nonetheless, 2 months after the invasion and the arrival of displaced Ukrainians it is safe to say that there are many inequalities between provinces and different decisions have been taken about very crucial aspects. Later in the report, we present deep dives into some of the most important issues regarding Education, Employment, and Childcare. However here we will concentrate on the first need that is crucial and the first step for obtaining basic needs.

The temporary protection directive has been launched and EU countries are pushed to provide immediate protection and rights to displaced Ukrainians. This involves social welfare assistance.** The central government is responsible for putting in place international policies but is also responsible for public health and education issues.

Municipalities have autonomy but must comply with national law and they must complement the work done at the national level. ***

Thus, there should be a central standardisation of some forms of support especially in covering basic survival needs.

We have gathered some situations that illustrate the reported unequal approach in municipalities.

In the case of bigger municipalities, **emergency assistance is organised** quite efficiently, but they do not have the capacity for long-term housing options (e.g., Amsterdam). Also, many people are hosted in private homes which **creates discrepancies in financial support** and social benefits.

Displaced people prefer families, but hosts are not able to provide housing long-term and report feeling overwhelmed. There are not always available mechanisms available **for organising transitions** from private homes to housing provided by municipalities which end up pushing people into **"housing limbo"** situations and provoke negative responses from Dutch individuals who are forced to continue hosting. Moreover, some municipalities refuse **to pay financial support**. The municipalities are also not willing **to provide alternatives to registration if host families** are living in rented apartments.

Finally, all financial support is suspended when people find jobs, but there aren't available mechanisms on how to provide people who are leaving shelters with housing - since from the day they start working - the displaced people become independent.

*according to the European Committee of the Regions, see: <https://portal.cor.europa.eu/divisionpowers/Pages/Netherlands-intro.aspx>.

**according to the European Commission, see: https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1469.

***according to the European Committee of the Regions, see: <https://portal.cor.europa.eu/divisionpowers/Pages/Netherlands-intro.aspx>.

DEEP DIVES

2. IMPLEMENTATION OF THE EU TEMPORARY DIRECTIVE

Implementation of the EU Temporary Protection Directive

The overall response to the situation of Ukrainian displaced people in The Netherlands and the possibility to address their needs and problems is closely linked to the implementation of the Temporary EU Directive that came into force on the 4th of March, 2022.

Starting from the 16th of May Ukrainians will start receiving the actual temporary status in the Netherlands. However, the capacity of the Immigration and Naturalisation Service (hereinafter IND) is limited, therefore delays are expected, which affect Ukrainian citizens, other asylum-seekers, and those who hold Ukrainian residence permits. This latter category remains unauthorised to work legally at the moment. Moreover, it is unclear which benefits will be accompanying this status.

While the IND is for now only issuing documents, many aspects surrounding the temporary protection status remain unresolved.

Alina fled with her son and cat to the Netherlands from Kyiv. She used to work as a manager in a small company. Back home, she applied for an international passport, but did not manage to get it. She knows a bit of English but has trouble opening a bank account which hinders her legal employment, shortly after she was proposed to work illegally. Therefore she agreed to work in a hotel for 12-13 hours a day. Alina knows that she will receive proof of identity from the IND, but the process is long. Meanwhile, it is impossible for her to retrieve her parcels, as according to the post office, she does not have a valid ID.

Zoom in case - Municipality of Hardewijk

If Displaced Ukrainians find jobs - they are assisted in finding an apartment to rent.

Zoom in case - Municipality of Purmerend

Most of the people who live in the temporary centers have found low-skilled jobs in the area.

Some of the most pressing issues concern the organisation of displaced peoples' lives in the Netherlands. For instance, here are some of the unresolved 'hot' topics:

- Will they have access to social benefits (such as childcare, house rent benefit - (huurtoeslag)?
- Can people who lose their job be eligible for unemployment benefits after 26 weeks and will they still be covered with their previous insurance?
- How will the temporary housing facilities be allocated when people have already found schools for their children and/or workplaces in the neighborhood they are currently living in?
- Will they be able to cook their own food if the municipality plans to hire a cook for the next year and how will this influence the benefits?
- What will happen if one wants to visit Ukraine for a bit?

To illustrate the effects of some issues on the ground, several vignettes based on the reports of our coordinators and cases we have come across in our work with displaced people, are effective and significant ways to get a vision as close to reality as possible.

Ksenia arrived with her mom, grandmother, three children, and a dog. She was living with a host family and received social support. After two months - Ksenia was asked by the host family to leave the house. She found a low-skilled zero-hour contract job, but her family still receives social benefits. Now, they live in a hotel where they share a single room with 8 more people. They would like to rent their own apartment in a small village in Brabant, but they are afraid to lose the social benefits. Ksenia is also worried about how to pay for her insurance if she loses her job.

Lucy had her own fashion brand in Ukraine. She fled from Bucha with her mom, who is an architect. She speaks English, but her mom does not. Lucy is also a marketing specialist and already has several offers from different companies, yet, she cannot acquire a self-employment status, therefore, will be employed by a minimum wage job, which is not enough to cover the rent for both of them. She stays with her cousin and his family in Amsterdam, but it is starting to feel crowded and overwhelming.

DEEP DIVES

3. BANK ACCOUNTS

Background

Opening a bank account depends on the possession of identification papers, accordingly, Ukrainian Displaced people have several different kinds of identification documents. These are:

- **Internal passports** (paper version, non-biometric) that are not used outside the borders of Ukraine. These are sufficient for conducting identifications inside the country and are used for all administrative procedures. The document is in Ukrainian only.
- **Non-biometric international passports** dating from before 2015. Before then all international documents were not biometric. They expire after 10 years and can be used for traveling abroad.
- **Internal biometric ID** cards that are slowly substituting the internal paper passports. They are issued in the form of plastic ID cards and are only used inside the country. The document is in Ukrainian and English.
- **Ukrainian birth certificates** have been used to cross the border for children and only given the critical circumstances. Normally, Ukrainian children should have an international passport to travel abroad, so this applies to those who did not manage to get a passport.

All Ukrainian documents are linked to the Diia Application which was launched as part of a national digitalisation program in Ukraine. This mobile application, Diia 2.0, allows Ukrainians to access **9 digital documents** (ID card, foreign biometric passport, student card, driver's license, vehicle registration certificate, vehicle insurance policy, tax number, birth certificate, and IDP certificates*). Accordingly, Ukraine has become **the first country with a digital ID** valid everywhere within the country and the **fourth country in Europe to launch a digital driving license**. All digital documents in Diia now have the same legal force as their plastic or paper counterparts. By using the Diia app, Ukrainians can also share digital copies of their documents, and pay fines for example. We have encountered **several cases** where Ukrainian citizens had lost their documents, but could still access them on their application.

Given the current situation, the printing machine normally used to issue biometric passports in Kyiv is not operating at full capacity. Therefore, In cases where Ukrainians do not have international or biometric documents, the Consulate of Ukraine provides them with a certificate of identification in English, which is, for now, the only available solution.

If the document is expired it can be automatically prolonged by the consulate, unless the document expired more than 5 years ago. In which case, the machine cannot recognise the prolongation, and the document remains invalid for all official identity checks.

Status

We estimate that 30% of all Ukrainian Displaced people who arrived in the Netherlands do not have biometric passports. At the moment, the Consulate of Ukraine has issued up to 6000 certificates, but we are aware that not all displaced people have applied to receive the certificates.

Consequently

- Ukrainian Displaced people cannot open a bank account in a bank in the Netherlands except for the Bunq which decided to recognise the certificates from the embassy (some exceptions were reported in the Regio Bank, but not confirmed).

*The internally Displaced People Certificate was introduced in 2014 by the Ukrainian government.

DEEP DIVES

3. BANK ACCOUNTS

- Some banks do not accept Ukrainian biometric ID cards due to the lack of understanding of Ukrainian documents.
- In municipalities where there are no available prepaid cards people cannot receive the allocated social support.
- In general, municipalities want to avoid providing social support in cash.
- People without biometric documents represent some of the most vulnerable groups of Ukrainian society who would never have considered traveling abroad (these are usually children, elderly people, and people with low income), and are at risk of labour exploitation. It is especially problematic for host families who carry the burden of supporting displaced Ukrainians financially.
- People with no biometric documents cannot enter the job market or use the variety of services that require identification (e.g., visit the post office).

Needs

- Biometric documents that can serve for identification purposes and be recognised as sufficient by banks.

Possible policy proposals/solutions

- Issuing biometric identity cards as a part of the implementation of the EU Temporary Directive.
- Making sure that the certificates from the embassy or internal documents are sufficient means for identification according to the identification legislation in the Netherlands. According to the Identification Law of The Netherlands (Wet Identificatieplicht), article 1:2 says that the Minister of Security and Justice can for a specified period make a change in the list of the documents sufficient for the identification of the person.
- Extending the capabilities of prepaid cards (for salaries, for example).
- Changing the rules of DBN in a way that the Dutch document or more precisely that the registration in BRP is enough to open the bank account.

How is it done elsewhere?

Austria:

Several banks operating in Austria have introduced a simplified procedure allowing Ukrainians fleeing the Russian invasion of their country to open a bank account.* The procedure and the documents required tend to vary between banks. Certain banks still require a passport (and potentially a proof of residence),** while others also accept other documents as a proof of identity. These other documents include Ukrainian ID cards as well as identity cards for displaced persons ("Ausweis für Vertriebene"), which are being issued by the Federal Office for Immigration and Asylum for Ukrainians who have registered them as persons in need of temporary protection in Austria.

Germany:

In Germany, similarly, special procedures are in place facilitating the process of opening a bank account for Ukrainians.*** Generally, to open a bank account proof of identity is required which Ukrainian passports and ID cards fulfill.

*See <https://www.wko.at/service/ukraine-faq.html>

**See e.g. [https://www.sparkasse.at/sgruppe/ukraine-hilfe-~-:text=Können ukrainische Bürger%3Ainnen ein,eine Debitkarte und Internetbanking George_"; https://www.bankaustria.at/aktuelle-informationen-konto-fluechtlinge.jsp; https://www.raiffeisen.at/stmk/de/meine-bank/kundenservice/hilfe-fuer-die-ukraine.html](https://www.sparkasse.at/sgruppe/ukraine-hilfe-~-:text=Können_ukrainische_Bürger%3Ainnen_ein_eine_Debitkarte_und_Internetbanking_George_)

*** See <https://www.verbraucherzentrale.de/wissen/vertraege-reklamation/kundenrechte/neu-in-deutschland-was-fluechtlinge-aus-der-ukraine-beachten-sollten-71305>

DEEP DIVES

3. BANK ACCOUNTS

Thanks to a communication by the German Federal Financial Supervisory Authority ("BaFin") from April 7th, 2022,* taking into account the fact that not all those fleeing the conflict have these documents, banks have been permitted to also accept any other types of Ukrainian documents identifying the person. However, these other Ukrainian documents need to be accompanied by a document issued by a German authority proving the correspondence between the person's identity and the name on the Ukrainian document presented. These documents given by German authorities include a proof of registration of residence ("Meldebescheinigung"), a certificate of registration for temporary protection ("Anlaufbescheinigung"), and a so-called fictional certificate ("Fiktionsbescheinigung") for those for whom a decision on a residence permit has not yet been finalized.

Poland:

Similar simplified procedures for Ukrainians wanting to open a bank account are being applied by Polish banks.** The procedures range widely among banks but in most cases, other documents than just passports or ID cards are being accepted. These documents include, among others, birth certificates, driver's licenses, and foreigners' temporary ID documents issued by Polish authorities ("Tymczasowe Zaświadczenie Tożsamości Cudzoziemca (TZTC)") or any other temporary ID documents issued by Ukrainian Consulates.***

*See https://www.bafin.de/SharedDocs/Veroeffentlichungen/DE/Meldung/2022/meldung_2022_04_07_Kontoeroeffnung_Flu_echtlinge.html

**See <https://www.najlepszekonto.pl/konto-osobiste-dla-obywatela-ukrainy>.

***See <https://direct.money.pl/artykuly/porady/ulatwienia-polskich-bankow-dla-obywateli-ukrainy-specjalne-oferty-i-udogodnienia>

DEEP DIVES

4. EDUCATION

Background

According to the National Information Center on Academic Mobility of Ukraine* (hereafter, ENIC Ukraine), the duration of an *elementary school* in Ukraine is four years. Children start school at the age of six. After elementary school follows the *basic school* (5th to 9th grade). According to ENIC Ukraine, from grade 5 children are involved in more **in-depth studies of specific subjects** that are important for targeted higher educational institutions. Basic school is 5 years long and leads to graduates (9th-year pupils) receiving a certificate of basic general secondary education, which gives them the possibility of either pursuing in a high school or following vocational training.

High school covers the 2 last grades - 10th and 11th. Completed secondary education may be acquired in general and specialised secondary schools, but also, boarding schools, lyceums, gymnasiums, colleges, and other institutions of general secondary education of the III grade. After completing high school, pupils have the opportunity to complete the **External Independent Test to enter universities**. On average young people graduate high school at the age of 17. According to Nuffic** the Ukrainian high school diploma is closely comparable to the HAVO diploma, but the level of the Ukrainian diploma is considered to be higher. Nonetheless, Ukrainian high school graduates will only be able to enter applied science universities and some research universities that are proving to be lenient (confirmed cases in the Universities of Amsterdam and Leiden).

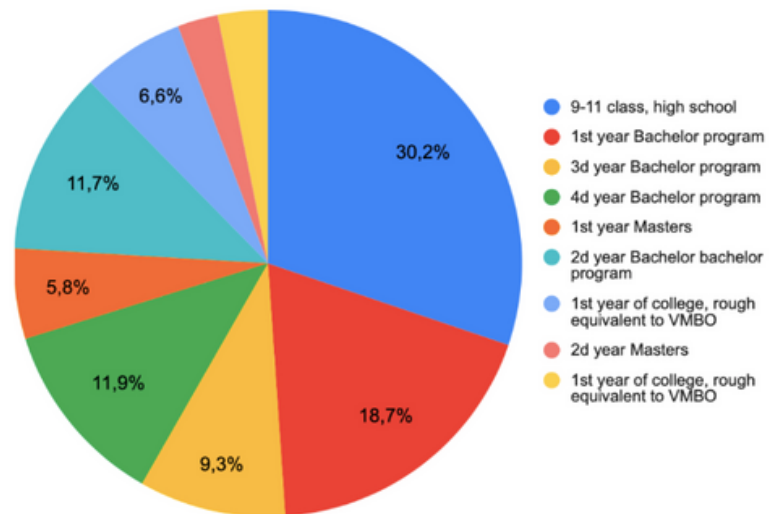


Fig 15.1. The survey conducted in May 2022 among Ukrainian displaced people, demonstrated that at least 30% of them are currently in high school (9th to 11th grade). N:503

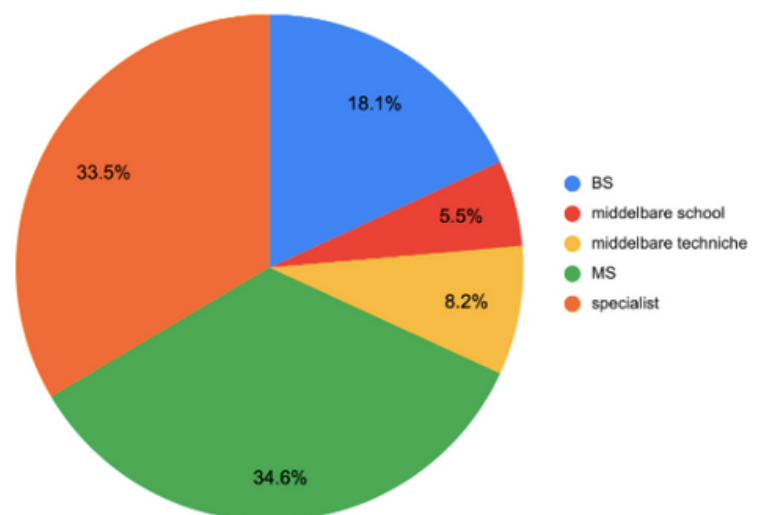


Fig 15.2. Educational level among Ukrainian displaced respondents in our survey. N:503

Important:

During the acute stages of the COVID-19 pandemic, **Ukrainian schools developed effective online programs that are being followed by displaced children worldwide*****. To our knowledge, most of the displaced Ukrainian children in the Netherlands are following online Ukrainian Educational programs.

*See <http://www.enic.in.ua/index.php/en/educationl-system/secondary-education/elementary-secondary-education>

**See <https://www.nuffic.nl/en/education-systems/ukraine/primary-and-secondary-education>

*** For the full list of all available opportunities, please consult the relevant page at our website help-ukraine.nl or the official Government resource: <https://lms.e-school.net.ua/>

DEEP DIVES

4. EDUCATION

Status updates

Elementary School

At the moment, we have not recorded any serious problems with elementary schooling among displaced Ukrainians. Most Ukrainian children are enrolled in elementary programs. The only problem that might arise is the possible transition to more permanent housing and associated travel costs for parents bringing their children to school.

Basic (Middelbare) School

The Ukrainian program is very different from the Dutch one: children are not divided according to their mental capabilities and are not tested at the age of 12 like in the Netherlands. Instead, they follow one unified educational program with slight discrepancies depending on the professional orientation of schools (e.g., mathematical or humanitarian schools). Considering the differences in educational levels, Ukrainian parents are currently encouraging their children to follow the Ukrainian school program online which is often taking place at the same time as the Dutch ISK classes. Therefore, in most cases, children are following both programs which is not sustainable.

For example, in Amsterdam, all pupils are invited to join ISK classes, which are taking place at the same time as the online Ukrainian programs for children from 5th to 11th grade.

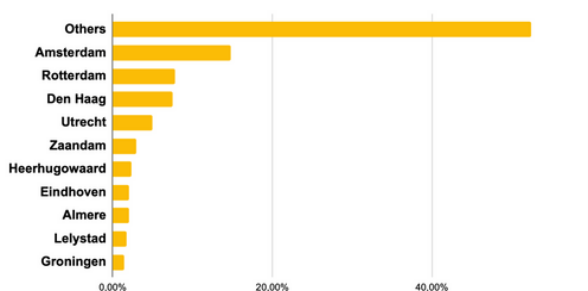


Fig 16.2. Distribution of respondents in our education survey. N: 503

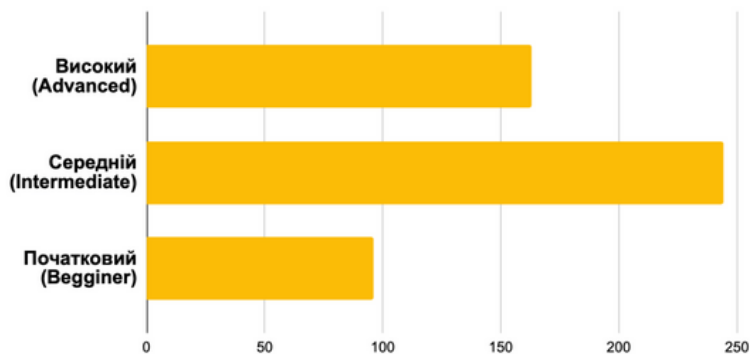


Fig 16.1. English level among Ukrainian displaced respondents in our survey, with results collected in the period from 22 April to 8 May 2022. N:503

This clash is creating misunderstandings between the Ukrainian community and educational officials. Similar tendencies are also occurring in other municipalities, like Haarlem. There is a discrepancy in how municipalities are dealing with the education of displaced Ukrainians with no unified or standardized available system from the central government.

Moreover, special concern should be given to available psychological help for teenagers and children involved in school programs. We have recorded some cases where Dutch psychologists with translators tried to provide help to Ukrainian teenagers but the efforts were not successful. The lack of cultural understanding and sensitivity could be a factor. However, most importantly, teenagers and children from the most affected areas lost their homes and friends which makes them demotivated and very traumatised which hinders active participation in the school program.

High School and University Students

According to the recent decision taken by the Ministry of Education in Ukraine, **all final school exams are canceled**. This entails that all children will be awarded certificates of completion of higher education based on their average grades. Graduates will be able to apply through the DIIA to acquire their certificate or request the electronic version by email. To enter Ukrainian Universities, high school graduates must complete a special test which will be available online or at an allocated location (given by the Ukrainian Embassy and Ministry of Education).

DEEP DIVES

4. EDUCATION

Nonetheless, some municipalities, have encouraged high school children to join ISK classes as well (e.g., The Hague) which means that they will lose several years to learn Dutch first and then be able to enter the Dutch educational system with no guarantee of receiving VWO or HAVO diplomas.

Since the knowledge of English is crucial for entering higher education, we asked our respondents to self-evaluate their English proficiency. We acknowledge that self-identified levels do not correspond to the formally recognised testing systems such as IELTS and TOEFL, but this serves as a good indicator emphasizing a willingness towards improving their English level. Yet, we are also aware of different tendencies. Some teenagers from more affected areas, small villages who lost their loved ones are not motivated to study.

Among them, 97.8% are planning to start their studies in the Netherlands (this includes all other categories in the survey).

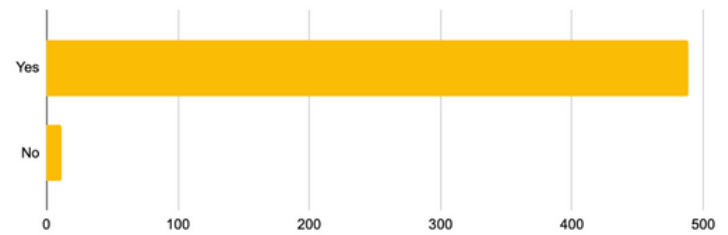


Fig 17.1. Education survey: Do you want to continue studying in The Netherlands? N:503

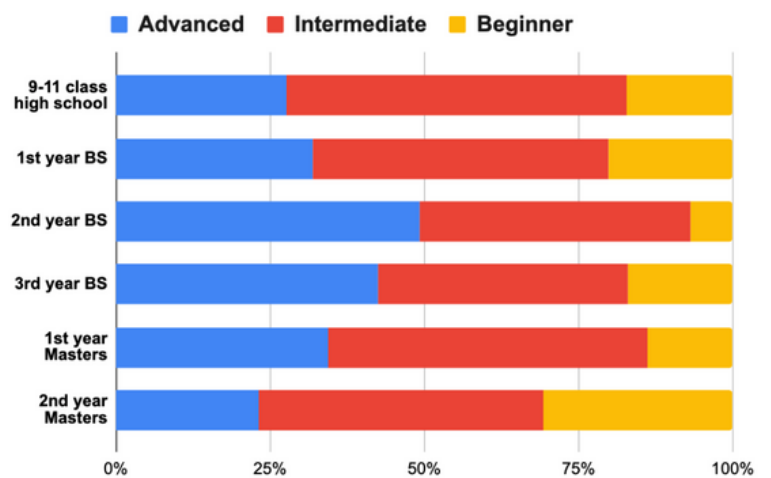


Fig 17.2. Education survey on the level of English. N:503

Needs according to the educational level:

Elementary school

- Transportation to the school.
- Availability of after-school classes for working mothers unable to pick up their children.

Basic school

- Integration of the Ukrainian program in the ISK classes.
- Effective collaboration with Ukrainian teachers.
- English and Dutch courses (depending on the different levels).
- Basic school equipment, laptops.



Fig 17.3. Respondents of our education survey by cities.

DEEP DIVES

4. EDUCATION

High school

- Space for Ukrainian graduates to complete their studies following the Ukrainian program.
- Intensive English courses for high school students (graduates) available in summer.
- Recognition of the high school electronic certificates.
- Available funding or scholarships for Ukrainian graduates applying to Universities of Applied Studies.

Possible policy solutions

Elementary school

- Planning long-term housing solutions (organizing the transfers from temporary hosting) with regard to the current placements of children in elementary school.

Basic school

- Officially recognising the Ukrainian teachers' diploma and providing them with long-term contracts not zero-hour ones.
- Integrating the Ukrainian program in the ISK program or providing a space allowing children to follow the Ukrainian program alongside integration classes.
- Finding a way to involve Ukrainian teachers and give them more permanent employment solutions - not zero-hour contracts or six-months contracts. Eventually facilitate Dutch courses and prepare them to enter the Dutch teaching market which is currently burning.
- Collaboration with local businesses and foundations to equip children with everything necessary to go to school.

Successful example: Dordrecht

Oksana Oliinyk came to the Netherlands approximately two months ago with her children. She settled in the municipality of Dordrecht where she was temporarily placed in the dormitory for Ukrainian displaced people. To provide an immediate solution - the municipality made a decision to set up a Ukrainian school, assigning it the ISK title and involving Ukrainian displaced persons in the administration of the school. Oksana became one of the school managers and was officially hired to run this hybrid educational form. The school is serving up to 100 children. Most of the teachers are Ukrainian (officially employed) and they follow the program of the Ministry of Education of Ukraine. At the same, all students receive Dutch and social integration classes. The school received the status of ISK2 under the network of international Dalton Lyceum Schools. Children are following English and Dutch classes, but there are not enough Dutch teachers for this number of students, therefore instead of 80 hours a month - children receive only 24 hours.

Students

- Securing funding for students who are willing to continue their studies in Dutch universities (both Universities of applied sciences and research universities).
- Acknowledging electronic certificates provided by The Ministry of Education as sufficient for the entrance to the Dutch Universities.
- Providing simplified procedures for checking the level of English, possibly exploring other testing alternatives as the IELTS and TOEFL tests are quite costly for displaced students.

DEEP DIVES

5. INFORMATION EXCHANGE

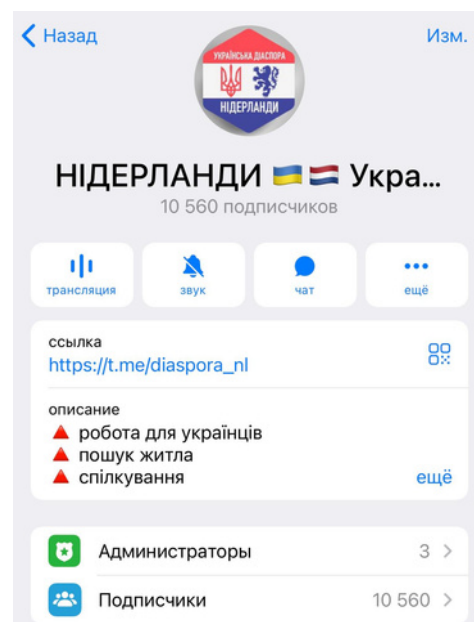
Status

Information is one of the most crucial aspects when arriving in a new country especially in circumstances of fleeing the war. Although the refugeehelp.nl website was launched, until now information about facilities, benefits, registration and more, have relied upon informal channels. For instance, a telegram channel that was created by a displaced Ukrainian himself, Facebook groups and the foundation's website, are some of the most used sources of information. Adding to this, almost every temporary location has its own telegram channel. The channels that are run by displaced people for displaced people have been very successful. For example, as the data-analytics provided from those sources show that in 1 week, there are on average **around 5-6k views on Telegram**, while the maximum number of views on the website only **reaches 3k**. While website visitors typically look for very specific information (i.e. about jobs, housing), Telegram provides an option to broadcast information to people in need without them being aware of the need.

However, because these sources are run by Ukrainian volunteers or displaced people themselves, they are not sustainable in the long term perspective. Another source of information depends upon housing situations, given that some displaced Ukrainians are in host families, and others are in housing facilities, the information that is spread is not the same, which leads to confusion and unequal access to different social benefits.

Furthermore, information sharing also depends upon available translators within municipalities. **Kateryna, the regional coordinator** for the foundation in Alkmaar, highlighted that there is an important need for someone who can act as a bridge maker in every municipality.

Thus, it is clear that there are multiple channels and sources of information because there are multiple actors that are involved in helping. Whereas this is a positive sign, it also highlights that there is a lack of cooperation between different highly organised entities, such as municipalities and all the organisations acting on the ground.



Needs

- A central streamline on where to go for which facility on a national level which can then be updated in accordance to the different regions.
- The creation of a permanent translator working for municipalities as a contact point as well as in the governments (successfully implemented in bigger municipalities, non existent in a smaller ones).

Policy proposals

- Include Ukrainian prospects in projects involving communication managers.
- Make it best practice to learn from organisations like Open Embassy.
- Identify, support and monitor existing information flows, promote the important information using the resources from the community itself.
- Promote the need for cooperation between all the important main actors (governmental entities, non governmental organisations and displaced people). Municipalities and all the present organisations should be pushed to have permanences, where they establish a collaborative and joint plan on how to share their resources and answer to the problems of their region/city.

DEEP DIVES

6. WORK

Zero-hour contract, temporary contract, health insurance, and the status of the self-employed.

Status

According to our survey, with responses collected in the period from 1 May to 9 May 2022, **6.5%** of displaced Ukrainians have found a job. Over **40% are actively looking** and 5% are in the interviewing process. Most are finding low-income jobs which are making it difficult to pay for medical insurance.

While 25% of Ukrainian displaced people in **Poland** already found a job, employment of displaced Ukrainians in the Netherlands remains a much more significant issue. In numbers, this means that **100,000 out of 400,000** displaced people who received a Polish BSN have found legal employment. In the Netherlands, since **the end of April, there are respectively only 4,300 out of approximately 40,000** (the data of those registered in BRP is changing). The Dutch market can be difficult to enter and there is the question of the language barrier, but this applies to Poland too. Poland has a big Ukrainian diaspora, but less financial resources and therefore was quite lenient in involving displaced persons in the job market.

From our interviews in different regions - we gathered that many displaced people (no statistical figures) receive **zero-hour contracts**, but are not aware of what the latter entail. Since it is required to have insurance once people get hired, it remains unclear what to do with **the health insurance once they do not have paid employment** (some municipalities confirmed that it is possible to return to social benefits and stop the insurance, in Groningen for example). Although we reached out to several health insurance companies, we think it is important to have clear governmental guidelines on the matter.

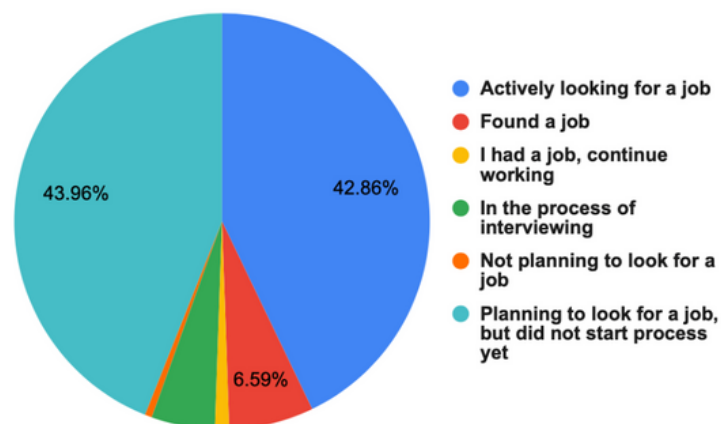


Fig 20.1. Our survey on work readiness. N:212

Although there is a demand for low-skilled workers, those who start working are not protected or feel rather unequipped, they are unaware of their rights and opportunities which are also not clear considering the current temporary protection status.

Needs

- Clarity and transparency when it comes to working rights.
- Inform insurance companies about the Ukrainian situation, and make sure they stop the subscription on time.

Policy proposal

- Clear health-care guidelines available in all municipalities and rightly distributed.
- Clear explanations about working rights (best practices: municipalities of Rotterdam and Amsterdam).
- Provide language courses to give people more tools to understand their rights as employees.

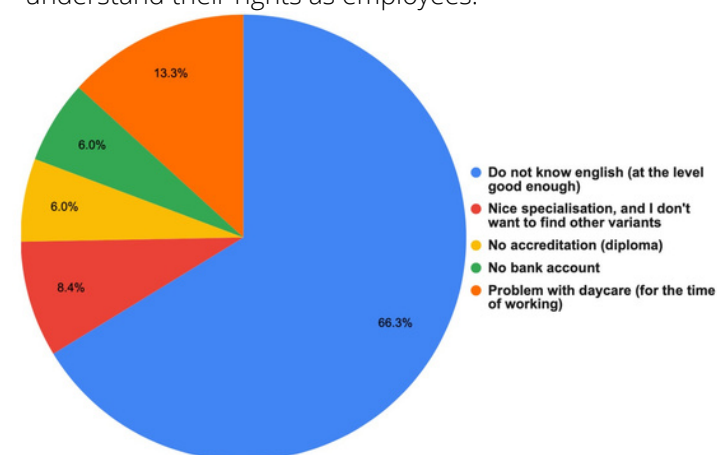


Fig 20.2. Top problems of Ukrainian job seekers from our survey. N:212

DEEP DIVES

6. WORK

Self-employment (Dutch: ZZP)

The inability to acquire self-employment status. In the letter from the Dutch Government dated 30-3-2022, it was stated that to protect Ukrainians, the Government decided to restrict Ukrainian displaced people from starting their own businesses when the majority of female Ukrainian displaced people were active in providing a variety of services back home.

In the section on the portraits of Ukrainians, we highlighted that Ukrainian women were the most active in services, retail, and education. Moreover, because many women came with children and no child care is available - they require flexibility.

Following the noble desire to protect, in many instances, the Dutch Government restricted people who have a chance to work for themselves as they were doing it back home.

For example, a fashion designer and marketing specialist Lucy is pushed to accept the **minimum wage salary** in one of the companies, because the latter could not simply provide full-time employment. On the contrary, five companies proposed her to work as a freelancer. The same counts for Olga, who had a wonderful shoe company in Kharkiv - she managed to bring along her employees and would have loved to continue developing her brand here in the Netherlands, but is unable to do so.

For reference

Ukrainians have founded the following start-ups:

- Whats App (migrant from Fastiv, Ukraine, Jan Koum).
- Grammarly (Max Lytvyn, Alex Shevchenko, Dmytro Lider).
- Gitlab (Dmitriy Zaporozhets and Sid Sijbrandij).
- Enjoy the Wood (Marina and Igor Fostenko - former co-student of the author of this report).

Needs

- Provide a possibility for Ukrainians to work for themselves.
- Provide information on how to be self-employed as safely as possible.

Policy proposal

- To protect people from being taken advantage of - collaborate with Ukrainian tax companies, such as **www.nalog.nl**.
- There are Ukrainian high-skilled migrants working in the Tax departments of the banks in the Netherlands - consult with them and involve them in providing tax services for those Ukrainians that do not speak English of Dutch.
- Provide information in Ukrainian in the Chamber of Commerce.
- Regulate the self-employment better, especially the most problematic sectors (e.g., low-skilled services, agriculture)

DEEP DIVES

7. HOUSING

Status

Since the arrival of displaced Ukrainians in the Netherlands, four different categories of housing possibilities emerged. Starting with private accommodation solutions, **the first category** represents those who stay with their friends or relatives who live in the Netherlands, while **the second** corresponds to those who are hosted by Dutch families. **The third category** concern those who are staying in temporary housing whereas the fourth represents the displaced Ukrainians who have moved into permanent locations (this involves flats that they have managed to rent, but also governmental facilities)*.

Although we do not have numbers to lay out a clear division of the displaced people between these four categories, according to the Ministerial Crisis Management Committee (MCCb)**, 50,000 places within permanent locations should have or are in the process of opening, across the Netherlands. This solution is very positive, however, there are still many families that remain within private accommodation (category one and two) which after 2 months is starting to be unsustainable for the hosts and guests.

Furthermore, it is important to take into consideration that although measures have been passed to open up permanent locations, what is happening from region to region is very different, and not every municipality has expressed its upcoming plan of action. This pushes forward the next big problem, that organising semi-permanent housing demands for collaboration between local actors. Most issues concerning housing need joint programs and this starts with establishing safety protocols for those who are still in the first and second categories. The government has only recently been working with TakeCareBNB to organise and securitise private accommodation solutions, however, most private hosting has been done informally.

Our regional coordinator from Twente, explains that in his region, the NUTWENTE initiative has taken on a particularly important role in putting in place a vigorous system of screening possible hosts, as no facilities were doing so at the beginning. Indeed, he highlights that ensuring safety in private accommodation is vital as some problems revolve around human trafficking and harassment. Although these events are rare, he points out that there is still a lack of protocols for screening, but also for conflict resolution (when host families or guests might need support). When TakeCareBNB started its mission in the region, he saw that as a very positive step, however, no bridge, or collaboration has been offered between them, the foundation, or the municipality. This point has been put forward as one of the main issues in most regions and applies to housing concerns especially as there needs to be a joint effort to help all displaced Ukrainian access more permanent locations, or at least ensure that those remaining in private housing or temporary locations receive the same information, which for now has not been guaranteed. This has led to situations where families staying in temporary locations, in red cross facilities, for example, have received full packages of support, while those staying in private accommodation had not.

Needs

- Ensuring the spread of information is done within the four categories of housing options equally.
- Cooperation between the different actors (municipalities, and different organisations) to share data, knowledge, and experience. This is crucial to improve efficiency but also to avoid overstepping on one another and double-tasking.
- Safety protocols for private hosting.

Towards long-term housing solutions

- Small-scale locations with developed infrastructures around them. Given the housing crisis in the Netherlands, we believe that community-based living that mixes Ukrainian and Dutch families could solve the housing problem and provide Ukrainian women with community support. There are successful co-living community projects in Amsterdam and other cities for families and young people.

DEEP DIVES

7. HOUSING

- Sufficient infrastructure and social support focusing for children to experience a care-less childhood and have decent educational opportunities maintaining ties with their motherland but also having a chance to make new friendships with Dutch teenagers. This means, that every location should be built considering the best interest of the child.
- Ukrainians are familiar with the European values and mentality; therefore, the children and young mothers have already started their integration process into host families. Although, they need separate housing, this should be within, not outside communities and there should be basic standardised architectural decisions to make this housing option suitable for long-term stay (having separate kitchens, for instance).



Fig 23.1. Municipality of Purmerend. Old municipality house made for displaced people

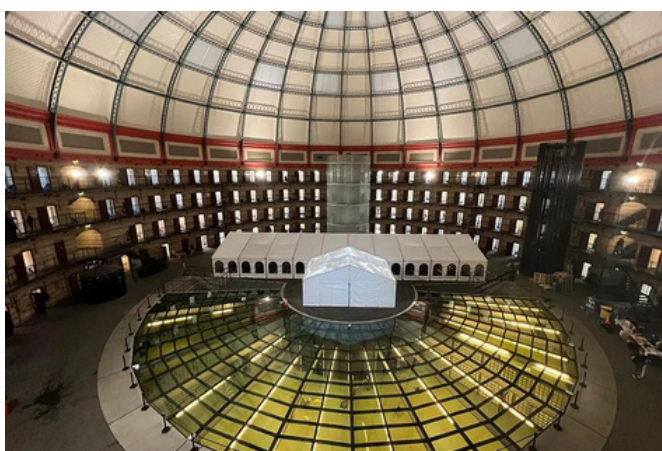


Fig 23.2. Municipality of Breda. Old prison made for displaced people

DEEP DIVES

8. CHILD DAY CARE

The majority of our regional coordinators reported that there is a growing problem with childcare. It is especially urgent for those female displaced people who have started working. Many Ukrainian women do not have their spouses next to them which makes them the main caregivers and breadwinners. The situation is also complicated by the cultural differences: Ukrainian women are staying at home with the child for at least 126 days (paid 70 days) and most kindergartens are accepting the children at the age of two. It points to:

- The need for daycare because there is no other solution to provide for the family.
- Possible distrust of the Dutch childcare and hesitance to bring the child.

Both can lead to important consequences.

- Women will not be able to work because they need to take care of children. If they stay in temporary facilities - they will not be able to work and would feel isolated. The benefits they receive would not be enough to cover basic expenses, but their needs will be expected to go beyond the food and shelter only.
- Misinterpretation of the context might lead to the assumption that the women are not interested in day care, whereas it is just cultural misunderstanding and the lack of trust.
- Most of the childcare facilities for Ukrainians are self-run kindergartens on the premises of the location. It remains unclear what happens to those staying in families with small children since they are not aware of self-organised initiatives.
- Many self-organised initiatives run on a voluntary basis, therefore, are not sustainable.

Policy proposals

- Institutionalize the kindergartens in the temporary locations and make them available for people who stay elsewhere.
- Involve elderly Ukrainians in taking care of children. In Ukraine, children are normally taken care of by grandparents, therefore, this practice is more familiar.
- Inform mothers who stay in private houses about self-organised child-care.
- Advocate for simplifying the rules to establish child care.

Best practice

In Purmerend, the child care was organised at one of the temporary locations. It was also available for people from Edam and Volendam. The kindergarten was run by Ukrainian and Dutch workers. Ukrainian workers were paid by the municipality.

DEEP DIVES

9. DRIVING LICENSE

Status

According to our survey, 28% of families or individuals that fled Ukraine did so by car. Although this does not say exactly how many displaced Ukrainians have cars in the Netherlands, it points towards the idea that many do and drive with their Ukrainian drivers license. However, these drivers licenses are not recognised in the Netherlands, and in some cases, displaced Ukrainians that have registered at municipalities for their BSN have been told that their license would only be valid for a maximum of 180 days. It appears that the lists to enter the driving license exams in the Netherlands are booked for months ahead making particularly difficult to obtain a license.

Needs

Recognising the Ukrainian drivers license as valid in the Netherlands.

Policy proposal

All high skilled migrants who are the subject of the 30 percent tax ruling in the Netherlands can change their driving license. This, in fact, is also valid for Ukrainian driving licenses. Yet, for any other types of visas that Ukrainians are holding, this rule does not apply. This means that for a Ukrainian student who received a high skilled job - there is no possibility of changing exactly the same license. To allow Ukrainians to change their licenses or make the Ukrainian driving license valid - will solve the problem.

How did you arrive in the Netherlands?

1638 responses

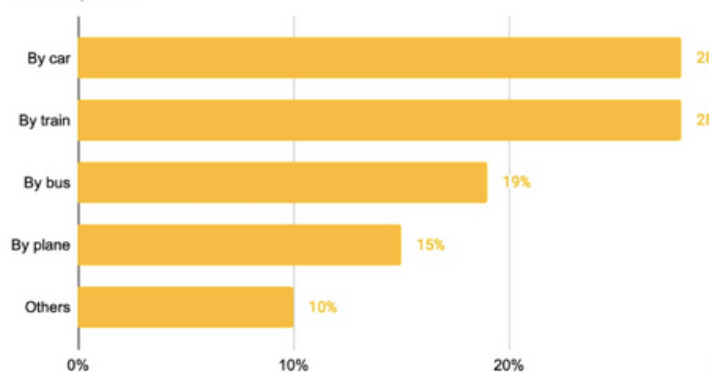


Fig 25.1.. Data from our Driving License survey.

DEEP DIVES

10. PSYCHOLOGICAL SUPPORT

First aid psychological support is available for displaced Ukrainians at humanitarian centers and short-stay temporal shelters operated by the Red Cross, and municipalities. As the majority of displaced people come from the most affected areas, we can only assume that some will need more long-term support. For example, cases where husbands or close family members have died, urgent interventions were needed for wives and children living here.

Thus, there is a growing need for individual and group psychological support for those suffering from the abrupt change of life, who may find it difficult to adapt, who suffer from losing loved ones who fight at the front line or who have post-traumatic stress disorder symptoms. **Yet, there are only a very small amount of Ukrainian/Russian speaking specialists with a license in the Netherlands.**

In the last two months we have processed 93 requests for psychological support from locally organised groups, from which 73% are adult individuals, and 27% are children under 18.

In addition, when asked about their mental state, 57% of the respondents evaluated their mental state as satisfactory, while 34% of respondents evaluated their state as critical. This data only presents the mental health concerns of people who reached out for help (the 78 requests) and does not represent the overall need for support of Ukrainians who fled the war to the Netherlands.

Please evaluate how do you feel right now

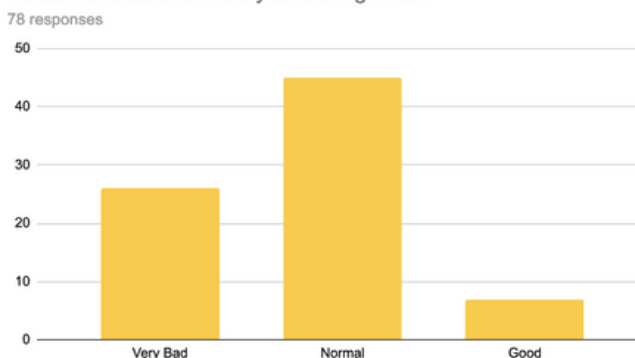


Fig 26.2. Psychological state survey among Ukrainians who fled the war to the Netherlands. N:93

Who needs help

93 responses

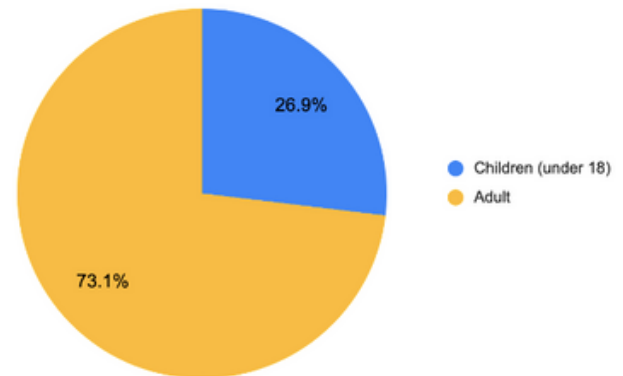


Fig 26.1. Distribution of people with psychological support requests by age. N:93

From interviews with individuals, concerns about the psychological state of teenagers have been indicated. For instance, this is what a Ukrainian school manager in Dordrecht told us:

"Some teenagers do not want to do anything. They did not apply for the final independent testing to get Ukrainian certificate for the completion of the secondary education, they lost their friends, houses and require psychological help, especially for those from the Eastern regions of the country."

Needs

- Ukrainian/Russian speaking psychological support and also possible trauma interventions (this applies to children too).

Solutions

- Creating ways for psychologists who fled to work in the Netherlands - by recognising their license or allowing them to have a ZZP status.
- Provide effective supervision.
- Involve Ukrainian experts who dealt with IDPs in 2014-2016 in the setting up processes of the project.

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