

STRENGTHENING THE PROTECTION AND INTEGRATION OF FORCIBLY DISPLACED AND STATELESS PEOPLE IN BELGIUM AND ABROAD

UNHCR Memorandum

in the context of the European, federal, regional, and local elections of 2024

Halfway through 2023, the number of people uprooted by conflict, persecution, violence, and human rights violations had risen to 110 million, an increase of 1.6 million compared to the end of the previous year. This upward trend shows no sign of slowing in 2024, as conflict and human rights violations in several parts of the world has led to further departures. The majority of forcibly displaced people are displaced within their own country (57%). More than half of those who crossed an international border to seek refuge came from 3 countries (Syria, Ukraine, Afghanistan) and 69% of these refugees were hosted by neighbouring countries.¹

In 2023, 35.507 persons applied for international protection in Belgium, and 12.355 persons were granted international protection. While the preceding years have seen increases in arrivals, including among unaccompanied children, in 2023 the total number of applications decreased compared to 2022.² Besides, the arrival of refugees from Ukraine required and generated a response from Belgian governments, civil society and citizens that was unprecedented in recent history.

Belgium is a party to several fundamental international conventions regarding international protection and the prevention and reduction of statelessness. Belgium ratified the 1951 Convention relating to the Status of Refugees (hereinafter the 1951 Convention) and acceded to the 1967 Protocol, ratified the 1954 Convention relating to the Status of Stateless Persons, and it has acceded to the 1961 Convention on the Reduction of Statelessness.

Belgium has long played an important role in the protection of forcibly displaced and stateless people, on its territory, in Europe and on the global stage. In that capacity, it has also been an important partner and donor to the Office of the United Nations High Commissioner for Refugees (UNHCR), the UN Refugee Agency.

Recently, at the 2023 Global Refugee Forum, Belgium reinforced its commitments towards forcibly displaced and stateless people, by pledging to include forcibly displaced persons in its development programmes, and by providing safe pathways through resettlement, labour, and education programmes.

At national level, asylum instances have continued to be reinforced, and innovative approaches to address the backlog in decision-making have been explored. Significant attention has also been devoted to improving information provision to asylum-seekers, especially at the start of the procedure, and important efforts have been made to address challenges faced by the guardianship system. In response to the influx of people from Ukraine, stakeholders worked together to ensure protection, design innovative reception solutions, and provide access to social support, employment and education. Brussels is also pioneering a model where refugees co-design integration policies on housing, employment, and education, and manage shelter facilities.

At the same time, challenges remain. The reception crisis continues to leave a number of applicants for international protection without shelter and support, which impacts not only their well-being and health but also the fairness and efficiency of their asylum procedure. A backlog in the processing of asylum applications keeps asylum-seekers in prolonged uncertainty and many of them in the reception system. Unaccompanied and separated children face protracted delays in

¹ UNHCR, Mid-Year Trends, 2023, <https://www.unhcr.org/mid-year-trends>.

² CGRS, Asylum Statistics: Survey 2023, <https://bit.ly/4bMN1ug>.

the appointment of a guardian and have limited access to specialized care and reception. Beneficiaries of international protection also encounter obstacles to being reunited with their close family members, while their access to housing, employment and education can be improved. While a residence permit is now foreseen for some stateless people, the related legislation raises some concerns. Also, the statelessness recognition procedure and data collection and publication need additional attention.

In the context of the European, federal, regional and local elections of June and October 2024, the formation of the next federal and regional governments, and the drafting of coalition agreements that will set out the policy for a period of five years, UNHCR shares the following ten priorities which aim at strengthening the protection of forcibly displaced and stateless people in Belgium and abroad. UNHCR remains available to pursue the dialogue and close cooperation on those matters.

1. UPHOLD THE COMMITMENTS TO SOLIDARITY AT THE INTERNATIONAL AND EUROPEAN LEVEL

In addition to the aforementioned conventional commitments, Belgium has been a vocal supporter of international protection and solidarity principles at the European and international levels, both towards forcibly displaced and stateless people as well as countries hosting them.

This approach is in line with the objectives of the Global Compact on Refugees: sharing the responsibility for the protection of refugees, including through support for host countries and communities. In the spirit of responsibility-sharing, engagement and investments are needed along the entire migration routes, targeting root causes, protection concerns and lack of access to rights in countries of origin, asylum, and transit, both for those in need of international protection and those seeking migration opportunities. Belgium has also demonstrated solidarity through resettlement and relocation. In this regard, UNHCR welcomed the resumption of the resettlement programme in 2023 and trusts that the opening of a dedicated reception facility in Alveringem will assist Belgium in returning to the growth path set for its resettlement programme.

At the European level, these objectives require engagement in the implementation of the EU Pact on Migration and Asylum with protection at its core. UNHCR urges Belgium to prioritize effective access to territory, fair and efficient asylum procedures, and adequate reception conditions. The additional protection risks faced by those with specific needs must be addressed. Detention should remain the exception, while investment in adequate and dignified reception arrangements or alternatives to detention should be prioritized. Dignified returns for people who are found not to be in need of international protection are equally crucial for a credible and functioning protection system.

Belgium and UNHCR are also connected through a solid partnership and the country is a long-time and solid contributor to UNHCR programmes benefitting forcibly displaced and stateless people, through substantial yet flexible funding.

Despite these generous contributions, UNHCR is significantly underfunded, by around 700 million US dollars at the end of 2023, gravely impacting its ability to implement protection and assistance programmes worldwide.

In this context, UNHCR encourages Belgium to maintain and deepen its commitment to forcibly displaced and stateless people on the international and European scene.

UNHCR recommends to:

- 1 continue to implement the **Global Compact on Refugees**, by upholding commitments made at the Global Refugee Forum of 2023 and taking up additional commitments, like increasing complementary legal pathways, investing in meaningful refugee participation, and joining the Global Alliance to End Statelessness.³
- 2 support a **route-based approach** as a way to reduce human suffering on dangerous journeys and offer effective, rights-based alternatives to externalization practices in countries of origin, transit and destination.

³ The Global Alliance to End Statelessness is a collaborative multistakeholder platform led by UNHCR. Its vision is to create "a world free from statelessness where everyone enjoys the right to a nationality without discrimination." The initiative is part of the UN Secretary General's 'Our Common Agenda' and aligned with the Sustainable Development Goals. For more information <https://bit.ly/3wSbjnq>.

- 3 implement the **EU Pact on Migration and Asylum** with protection at its core, including by guaranteeing access to the territory for persons seeking asylum, through border procedures that do not equate *de facto* detention (as detention should remain the exception), and by showing solidarity to EU Members States hosting large numbers of refugees.
- 4 resume and maintain the growth path set for **resettlement** and increase humanitarian admission for refugees. Also ensure access for refugees to education and labour pathways available to third country nationals, by making them more flexible and adapted to their needs, continue to support projects for **complementary pathways to protection**, such as EU-Passworld and DT4E, and ensure that they can be scaled up.
- 5 remain a **reliable donor** to UNHCR, by providing quality funding through flexible, timely and multi-year contributions that allow the Agency to swiftly and effectively respond to humanitarian emergencies worldwide. Maintain the target to commit 0.7 per cent of Gross National Income to **development support**, as set out in the 2030 Agenda for Sustainable Development.
- 6 enable by law **tax deductible giving** to UNHCR as a means to allow UNHCR to effectively engage the Belgian public on international solidarity.

2.

MAINTAIN AN ASYLUM SYSTEM THAT IS EFFICIENT AND PROTECTS THOSE IN NEED

Belgium has traditionally maintained a solid system of international protection including provision of free legal aid. However, this system has lately been fragilized by a reception crisis that could compromise the fairness and effectiveness of the asylum procedure (See recommendation 3).

In addition, asylum instances face a substantial backlog. This generates significant delays in decision-making, negatively impacting the well-being of applicants for international protection and extending stays in saturated reception facilities. In this context, UNHCR welcomes initiatives that have been taken to reduce the backlog while maintaining the quality of the decisions.

UNHCR also welcomes the considerable endeavours made to improve the provision of relevant information to applicants in a language they understand, notably at the start of the procedure. However, while Belgium maintains a robust mechanism for the provision of legal aid, the quality of the legal aid provided, especially in detention, may vary considerably.

Further, the identification of persons with specific needs and the provision of appropriate support to them could also be improved, particularly in detention. This is essential to ensuring a fair procedure.

Another challenge is the identification of solutions for rejected asylum-seekers without residence rights, who cannot be forcibly returned to their countries of origin due to the circumstances prevailing there and existing non-return advisories.

Finally, legislative reforms are called for as the EU Pact on Migration and Asylum will need to be implemented and the Aliens Act has become difficult to read and understand due to multiple amendments.

Therefore, UNHCR recommends to:

- 1 ensure fair and efficient procedures as well as access to them, for all applicants for international protection, including for those who do not benefit from reception and the unaccompanied and separated children awaiting the appointment of a guardian (See recommendation 5.3).
- 2 address the **backlog** in the asylum procedure and ensure that decisions granting or denying international protection are taken within a reasonable timeframe without compromising the quality of the decision-making process.
- 3 guarantee swift **access to quality legal aid** for applicants for international protection, ensuring the funding necessary to sustain a quality legal aid system and improving the monitoring of its quality, especially in detention.
- 4 identify **persons with specific needs**, and provide adapted care, support and protection throughout the procedure, in particular in detention.
- 5 consider introducing continuous **quality control** of the processing of applications for international protection, to measure the effective application of the legal obligations and qualitative objectives set and, if necessary, identify corrective measures.

- 6 consider granting a temporary residence permit on a humanitarian basis to **Afghan nationals** whose asylum application has been rejected, considering the non-return advisory to their country of origin.
- 7 pursue efforts to simplify the **Aliens Act**, while respecting international protection standards.

3.

ENSURE QUALITY RECEPTION FOR ALL FORCIBLY DISPLACED PERSONS

As mentioned, Belgium has long been credited for its robust asylum system, complemented by a well-structured reception framework. However, the deterioration of the reception situation in the last few years is concerning, as evidenced by the 8,816 individuals who did not receive accommodation on the day of their asylum registration in 2023.

Access to adequate reception conditions is fundamental for all applicants for international protection, including single men, to uphold their fundamental human rights and safeguard effective access to international protection for those in need thereof. Failing to deliver comprehensive reception encompassing medical, psychological, social, and legal support is likely to compromise the fair and effective nature of the asylum procedure.

UNHCR recognizes the key support that Fedasil staff and civil society actors have been providing to applicants for international protection throughout the ongoing reception crisis. It further welcomes the authorities' efforts, despite challenges, to create additional reception places, identify emergency response for the winter and reinforce the asylum instances. It also salutes the reopening of the Fedasil Infopoint to ensure that applicants outside the reception network can access adequate information about their rights. These efforts have however not yet remedied the situation, as for a third consecutive year, some asylum-seekers continue to sleep rough. By mid-2024, over 3,800 applicants for international protection were on the waiting list for reception, and waiting times to access reception have increased up to six months. Sleeping outside for months can have serious consequences for the mental and physical health of individuals and compound vulnerabilities. While the opening of the Refugee Medical Point is undoubtedly a step in the right direction, it is essential to acknowledge that this initiative alone does not fully address the dire healthcare needs of asylum-seekers enduring the harsh reality of homelessness.

UNHCR is confident that Belgium will strive to explore all avenues to offer dignified living conditions to all applicants for international protection. The speed and manner in which Belgium provided shelter for refugees from Ukraine shows the country's capacity to identify solutions with a concerted effort by all actors at federal, community, regional and municipal level.

Lastly, as independent private accommodation is the most suitable form of accommodation, it will remain important that applicants for international protection can move to smaller-scale housing as soon as possible and at least after spending six months in collective accommodation, as outlined in the 2007 Reception Law. This is needed to maintain or restore a sense of normality and to allow privacy and dignity.

Therefore, UNHCR recommends to:

- 1 guarantee access to **quality reception for all applicants** for international protection, without discrimination, from the presentation of their claim until a final decision is made by the asylum instances. This is essential to ensure a fair and effective examination of their protection needs.
- 2 invest in **small-scale reception** for all applicants for international protection, considering its positive effect on applicants' integration and well-being. Where resources do not permit this, collective centres should be as small as economically feasible and residents should be allowed to participate in the management of material resources and aspects of life in the centre, taking into account age, gender and diversity considerations.
- 3 guarantee **direct and unconditional access to health services**, including specialized mental health and psychosocial support services, for all applicants for international protection. A specialized support mechanism should facilitate access for those applicants outside the reception network.
- 4 improve the identification of **persons with specific needs** (including LGBTQI+ persons, women at risk, single-headed households, unaccompanied and separated children, persons with serious health conditions, persons with special legal or physical protection needs, elderly persons, and persons with disabilities) and refer to accommodation appropriate to the needs identified. Ensure that a needs assessment is continuously carried out throughout the procedure.

- 5 build on **innovative strategies for reception**, such as the use of host families and emergency villages, to guarantee accommodation for all applicants for international protection. (See recommendation 10.3)
- 6 ensure that the reception system evolves towards **greater flexibility** to respond to the natural fluctuation in arrivals of asylum-seekers, by planning for contingencies, providing buffer capacity and adjusting legal and regulatory frameworks that impede a swift response.
- 7 ensure **cooperation among all stakeholders** at federal, regional, and local levels, to ensure sustainable solutions that can offer dignified living conditions to all applicants.

4.

REDUCE THE USE OF DETENTION, WHILE FURTHER DEVELOPING ALTERNATIVES

Due to its devastating human cost, the detention of applicants for international protection should be avoided and only used as a measure of last resort: freedom is the principle, detention the exception. Detention should only be applied where it pursues a legitimate purpose and has been determined to be both necessary and proportionate in each individual case. As far as children are concerned, they should not be detained for immigration related purposes, irrespective of their legal/migratory status or that of their parents, as detention is never in their best interests. Therefore, UNHCR welcomes the recently adopted ban on keeping families with children in closed centres as well as the alternatives to detention developed in Belgium and their inclusion in legislation.

Yet, while most applicants for international protection are not detained in Belgium, the **systematic detention** of applicants for international protection at the border, including persons with specific needs, remains a cause of concern. In addition, UNHCR is concerned about the use of cumulative grounds for detention, which extends the duration of detention.

Therefore, UNHCR recommends to:

- 1 end the **systematic detention** of applicants for international protection at the border.
- 2 ensure that detention is **as short as possible** and avoid cumulative detention on different grounds.
- 3 guarantee an automatic, prompt, and regular **judicial review** of the lawfulness, necessity, and proportionality of each detention decision, which ensures that there is no less coercive measure available, and that detention is a measure of last resort. This review should consider special needs (See chapter 2, recommendation 4).
- 4 Further pursue the development and implementation of **alternatives to detention**, the allocation of sufficient funds, and their regular evaluation to improve existing measures.

5.

GUARANTEE ACCESS TO ADEQUATE PROTECTION FOR ALL CHILDREN, ESPECIALLY WHEN SEPARATED OR UNACCOMPANIED

Forcibly displaced children are particularly vulnerable, especially when they are separated or unaccompanied. In 2023, out of the 2,594 persons applying for international protection declared to be unaccompanied children; about 1,660 were recognized as such.⁴

The lack of available guardians is a major challenge affecting separated and unaccompanied children. Important efforts have been made to address shortcomings of the guardianship system, including the hiring of additional guardians, a reform of the financing system to allow for faster recruitment and the strengthening of the guardians' training. At the beginning of 2024, however, about 1,000 children were still awaiting the appointment of a guardian. During this time, children face a higher risk of abuse and lack of care, and their asylum procedure is on hold, which in turn delays their reunification with close family members. Concerningly, different actors also report an increase in disappearances among unaccompanied children.

⁴ CGRS, Asylum Statistics: Survey 2023, <https://bit.ly/4bMN1ug>.

UNHCR has thus welcomed the Inter-Ministry Conference on Migration and Integration that was called including to better coordinate policies affecting unaccompanied children across governance levels.

Over the last years, access to reception has not always been guaranteed, despite efforts by the authorities to increase the reception capacity for children. Today many children, including young children, are hosted in collective “immigration” reception facilities instead of foster families or small reception facilities, and cannot access youth care programmes. Their access to education has not always been guaranteed due to, for example, waiting lists for introductory classes. Finally, age assessment procedures focus too heavily on contested medical testing and are lengthy.

Therefore, UNHCR recommends to:

- 1 ensure access for all children in need to **youth care services**, without discrimination. Effective care requires an individual assessment of every child’s profile and needs, the drafting of a care plan and a coordinated implementation of that plan.
- 2 ensure immediate and **appropriate reception** for all children. Place unaccompanied children in foster families or small facilities, as much as possible. (See recommendation 3.4) Organize accessible and flexible pre-reception, targeting those children who are at risk of disappearing from reception, or never entering reception.
- 3 provide every unaccompanied or separated child with **immediate access to a guardian**, including during the age assessment. Sufficient investment in hiring, training, and supporting guardians is essential.
- 4 limit the use of **age assessments** to situations where a child’s age is manifestly in doubt. Use comprehensive assessments that consider both the physical appearance and the psychological maturity of the individual. Such assessments need to be conducted in a safe, child- and gender-sensitive manner, by specifically trained personnel.
- 5 ensure effective **access to education** for all forcibly displaced children. Provide introductory education tracks for all who enter the Belgian education systems, complemented with measures to support transition to regular classes

6.

FACILITATE THE REUNIFICATION OF FAMILIES SEPARATED BY CONFLICT AND PERSECUTION

In 2022, 5,552 applications for reunification were made by family members of forcibly displaced persons; 3,270 visas were awarded.⁵

Family reunification is often the priority for forcibly displaced persons, as it is an important step to return to a normal lifestyle and to integrate successfully in the country of asylum. Being separated from family, and having to constantly worry about their safety, impedes that process. Family unity and (by extension) access to family reunification are basic human rights. Therefore, UNHCR has long advocated for family reunification procedures to be efficient and flexible. UNHCR thus welcomes the recent developments in Belgium, allowing family members to apply for family reunification remotely when it is impossible or excessively difficult for them to travel to the diplomatic post. However, this positive development towards more flexibility remains limited. UNHCR also supports the recent adoption of a legal provision providing residency rights for parents whose children are beneficiaries of international protection in Belgium, which favours family unity.

Forcibly displaced persons continue to face a variety of practical, administrative, and financial barriers when applying for reunification. Those barriers include difficulties in securing official documents proving identity and family ties, the short validity of documents, and the existence of significant fees. In addition, they face many practical obstacles such as difficult journeys to embassies and consulates, long waiting times for appointments, and long processing times for applications. In addition, it is unclear whether protection safeguards have been put into place for external service providers who process visa applications of forcibly displaced persons’ family members. As a result, many forcibly displaced persons are unable to meet the one-year period in which more lenient conditions apply for family reunification. The challenges are even greater for relatives who do not belong to the nuclear family, even when they are dependents of beneficiaries of international protection in Belgium.

⁵ MYRIA, La migration en chiffres et en droits 2023 – cahier « Droit de vivre en famille », <https://bit.ly/4c0g1yA>.

Therefore, UNHCR recommends to:

- ① adopting **flexible procedures** for receiving and processing visa applications for family reunification.⁶ These include:
 - 1.1 extend the granting of exemptions from the requirement to **appear in person**, when individuals face challenges to access embassies and consulates due to financial, administrative, security or logistical reasons. Online applications or applications from Belgium should be possible.
 - 1.2 making the procedure **financially accessible**, by reducing visa application fees, refunding DNA tests when the result is positive, and expanding financing possibilities. Belgium could also accept financial restrictions as a justification for submitting a visa application after the one-year deadline, so that forcibly displaced persons can still benefit from the more lenient conditions for family reunification.
 - 1.3 adopting a holistic approach to the sum of the available identity and relationship-supporting **evidence**, systematically applying the cascade system provided by the Aliens Act, which implies that a DNA test is a last resort.
- ② exempting beneficiaries of international protection from the **obligation to fulfil the conditions** relating to stable, regular, and sufficient resources, appropriate accommodation, and health insurance, regardless of the application date for family reunification.
- ③ guaranteeing swift access to **quality counseling and legal aid** in the context of family reunification, including by ensuring adequate funding and capacity-building of relevant private and public actors.
- ④ ensure quality control when authorities **externalize services**, by ensuring that staff is trained to support refugees, services are (financially) accessible, appointments are provided within reasonable time and protection safeguards are put into place.

7. REINFORCE THE PROTECTION OF STATELESS PERSONS, AND PREVENTION OF STATELESSNESS

Belgium is a party to the 1954 Convention relating to the Status of Stateless Persons and to the 1961 Convention on the Reduction of Statelessness. The Belgian nationality code contains strong safeguards to prevent statelessness of children, and in case of loss or deprivation of nationality.

However, challenges remain regarding the statelessness determination procedure before the courts, including insufficient procedural guarantees, inconsistency in quality of decision-making, length of the procedure and a lack of residence permits for those seeking recognition. Further, UNHCR takes note of the recent adoption of a law on residence permits for stateless persons, which relates to a major protection gap. It is however concerned that the law might in practice weaken the situation of stateless people in Belgium, rather than strengthen it. In particular, the law creates a parallel procedure for statelessness determination in the context of the residence permit procedure. It also limits the access to a residence permit by introducing conditions and admissibility criteria beyond those recommended by UNHCR or the Belgian higher courts.

Regarding statelessness prevention, although the Belgian nationality code contains a provision designed to prevent statelessness of children born in Belgium, its practical application may not always be in line with the 1961 Convention on the Reduction of Statelessness. UNHCR has recently communicated about the lack of procedural safeguards when it comes to the withdrawal of Belgian nationality previously attributed to a child born in Belgium.

Finally, although statistics on statelessness exist, they do not provide a complete overview of the situation of the stateless population in Belgium, particularly regarding the recognition rates of the statelessness determination by the courts and the residence permits procedure.

⁶ See also: UNHCR, Recommendations on flexible approaches to family reunification procedures in Europe, 2023, <https://bit.ly/3wQQoRH>.

Therefore, UNHCR recommends to:

- 1 strengthen the **statelessness determination procedure** before courts by including specific procedural safeguards and building capacity among courts, public prosecutors, and lawyers.
- 2 ensure the **implementation of recently adopted legislation** on a residence permit for stateless people in line with Belgium's international obligations, such as the 1954 Convention relating to the Status of Stateless Persons as well as UNHCR guidelines and build capacity among relevant administrations and courts.
- 3 **evaluate the implementation** of the legislation on a residence permit for stateless persons and adopt corrective measures as relevant.
- 4 grant a **temporary residence permit** to applicants during the statelessness determination procedure and during the application for admission for residence on grounds of statelessness.
- 5 gather and make available **quantitative and qualitative data** on stateless populations, and the implementation of the statelessness determination and residence permit procedures.
- 6 ensure that practice regarding **statelessness prevention** is in line with the 1961 Convention on the Reduction of Statelessness and UNHCR guidelines, and **build** capacity among civil registrars, public prosecutors and lawyers on statelessness prevention.
- 7 implement the Global Compact on Refugees, **by joining the Global Alliance to End Statelessness**.

8.

FOSTER INCLUSION OF FORCIBLY DISPLACED PERSONS

Successful inclusion and integration are key to building a society where receiving communities and beneficiaries of international protection can contribute equally. UNHCR therefore commends the efforts made in the last decade to provide forcibly displaced persons with a chance to be an active part of Belgian society. Notably, the time that applicants for international protection must wait to access the labour market has been reduced to four months. In addition, integration tracks are now provided in all regions, and those fleeing the war in Ukraine have had immediate access to such tracks. In Flanders, the procedure to have qualifications recognized was also simplified; and is open to applicants for international protection. This region also created a special regime for temporary housing, allowing people to rent to forcibly displaced persons, in a flexible yet regulated fashion.

However, challenges remain regarding housing, language learning and access to employment. An ongoing housing shortage prevents refugees from accessing long-term housing – a condition sine qua non to integrate successfully. This situation also impacts the reception of applicants for international protection (see recommendation 3.1) and the resettlement programme (see recommendation 1.4). In Flanders, newly adopted legislation introduced additional criteria to access social housing, such as the requirement to be locally embedded, which will further impact refugees' opportunities to access social housing. Also, discrimination is regularly reported throughout the country on the housing and labour markets. In addition, more than in some neighbouring states, language barriers seem to keep refugees from entering the labour market; at the same time the integration tracks created to teach Dutch are no longer free, potentially making them less accessible. In Flanders, applicants for international protection have been excluded from citizenship courses. More generally, the participation to such programmes may be hindered by financial or other practical considerations. Finally, overall, federal, regional, and local initiatives could be better coordinated to further boost the integration processes. UNHCR therefore welcomed the creation of an Inter-ministry Conference on Migration and Integration aimed at ensuring greater harmonization between the policies of the federal authorities and the federated entities.

Therefore, UNHCR recommends to:

- 1 further improve **coordination of policies and their implementation** among federal, regional, and local actors, including through the Inter-ministry Conference on Migration and Integration. (See recommendation 5)
- 2 **ensure** integration programmes including orientation, language and vocational training, are **available, (financially) accessible and start as early** as possible during the asylum procedure. To that end, ensure careful consideration of the individual situation of applicants and beneficiaries of international protection and appropriate support to enable participation, such as access to childcare or a waiver of registration fees.

- 3 evaluate and adopt structural solutions **to address discriminatory practices** that obstruct access to employment and housing.

Labour

- 4 guarantee access to **quality language and vocational training** to forcibly displaced and stateless people. These trainings can start during the asylum procedure.
- 5 promote **access to the labour market** while forcibly displaced and stateless persons are still **learning the national languages**.
- 6 facilitate the recognition of formal and informal **qualifications**, by making a holistic assessment of qualifications, flexibly assessing documentation, and designing alternative tracks for qualification testing. Also allow applicants for international protection to have their qualifications recognized.

Housing

- 7 support refugees in **securing private accommodation**. The government can help build trust with landlords, including through the provision of guarantees or loans for rental deposits.
- 8 provide **sufficient social housing**, that is also accessible to beneficiaries of international protection.
- 9 facilitate **shared housing**, for example by lowering the administrative threshold and creating a favorable tax environment, ensuring monitoring and vetting mechanisms, while investing in services to support hosts. (See recommendation 10.3)

9.

ENSURE THE PARTICIPATION OF FORCIBLY DISPLACED AND STATELESS PEOPLE IN DECISIONS THAT AFFECT THEIR LIVES

Including forcibly displaced and stateless people in decision-making processes that affect them is an essential condition to guarantee successful integration. On the one hand, it allows for effective communication between governments and forcibly displaced and stateless communities, which in turn strengthens connections with host communities. On the other hand, the partnerships bring forth effective and sustainable solutions for the integration challenges that forcibly displaced and stateless people face, especially when all groups are represented (including women, young persons, the elderly, persons with disabilities, LGBTQI+ persons). The participatory approach reinforces the autonomy of forcibly displaced persons, allowing them to take their future into their own hands and to contribute to the society that they become a part of.

Belgium is pioneering with its refugee committee model. In Brussels, 10 refugee committees are working closely with the regional and local authorities, providing essential data, and developing solutions for refugees. Representatives of these committees have been recruited by the Brussels regional government, to take part in the planning and implementation of policies on access to education, health services, work, and housing. This has allowed the authorities to better identify the communities' needs, develop more effective policies, and communicate them to the targeted communities. The committees also manage community centres and collective shelter facilities, often in temporarily vacant buildings.

Therefore, UNHCR recommends to:

- 1 **include refugee- and stateless-led organizations in policymaking** at the federal, regional, and local level to improve integration policies, notably on housing, employment and education.
- 2 **support refugee- and stateless-led organizations** including financially, so that they can support refugees' integration process. By providing a first point of contact, organizing community centres, and designing tailored integration programmes, they are a crucial ally in getting refugees a job or a home.
- 3 further invest in **refugee mobile teams**, that can support the authorities' outreach to applicants and beneficiaries of international protection and allow a swift response to emergencies including within the community.
- 4 strengthen and expand the practice where **temporarily vacant buildings** are used for collective shelter, run by refugee committees. These buildings can be part of a strategic reserve to provide shelter when the reception network is saturated. (See recommendation 3)

10.

CAPITALIZE ON THE LESSONS LEARNED FROM THE UKRAINIAN REFUGEE RESPONSE

Since the start of Russia's full-scale invasion of Ukraine, more than 6 million persons were forced to leave the country. About 80,000 have sought refuge in Belgium, where they receive temporary protection. This influx led Belgian policymakers to take extraordinary measures, showing a willingness to invest in reception, and a pragmatic approach towards the integration of those fleeing Ukraine. The federal authorities also provided comprehensive, accessible data about the population of temporary protected persons through its Statbel-platform. However, national, regional, and local data were insufficiently integrated, and the platform does not provide accessible data concerning other forcibly displaced persons. At the same time, civil society, the private sector, and thousands of citizens were mobilized, prompting an unprecedented show of solidarity.

These experiences should be further developed, considering the ongoing war in Ukraine and the need to make long-term plans that extend beyond March 2025. In addition, there is a clear opportunity to draw from them as they constitute an inspiration to improve the protection of all forcibly displaced persons.

Therefore, UNHCR recommends to:

- 1 maintain efforts to ensure further **coordination** across government levels as regards refugee response.
- 2 maintain efforts towards the collection and availability of relevant, comprehensive, and disaggregated statistical data about all forcibly displaced persons in Belgium, bringing together national, regional, and local data.
- 3 explore how to scale the **refugee committee model**, which includes refugees in policymaking, thus making integration policies and outreach to refugee communities much more effective. (See recommendation 9)
- 4 build on **innovative strategies for reception**, including the use of temporarily vacant buildings and emergency villages, to guarantee accommodation for all those applying for international protection.
- 5 further explore the potential of **host families** to provide accommodation to forcibly displaced persons. Encourage **shared housing**, for example by lowering the administrative threshold and creating a favourable tax environment, ensuring monitoring and vetting mechanisms, while investing in services to support hosts. (See recommendation 8.9)
- 6 expand innovative approaches to **recognize formal and informal qualifications** more quickly, make a holistic assessment of qualifications, and flexibly assess documentation that proves qualifications.
- 7 extend immediate access to integration programmes, education, training, and the labour market to all applicants for international protection. Build on local programmes that have been successful in getting persons housing and employment.
- 8 extend the protection regime for those who fled the war in Ukraine, considering the disadvantages of repeated one-year extensions, and refrain in the current context from forcibly returning persons to Ukraine. Work towards a coordinated and harmonized approach amongst hosting states.