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EXPERT &  
PRACTITIONER  
CONFERENCE REPORT

EMN BELGIUM



Beyond housing:  
Reception and support of  
applicants for international  
protection other than in kind  
15 and 16 December 2025

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**BEYOND HOUSING: RECEPTION AND SUPPORT OF APPLICANTS  
FOR INTERNATIONAL PROTECTION OTHER THAN IN KIND**

BRUSSELS, 15–16 DECEMBER 2025



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## EXECUTIVE SUMMARY

Reception systems for applicants for international protection are under sustained pressure across the European Union. In Belgium, while capacity and resource constraints continue to affect the reception network, the large majority of applicants currently living outside reception facilities do so by choice. Many rely on private accommodation, stay with friends or family, maintain income-generating activities, or prefer to remain close to their social and professional networks, valuing the autonomy associated with independent living. While the number of applicants involuntarily remaining outside reception while awaiting a place has decreased and is lower than the number voluntarily staying outside the reception network, it nonetheless remains an important point of attention.

This EMN Belgium Expert & Practitioner Conference examined how reception and support can be organised when housing in kind is not used or not required, with a particular focus on applicants who voluntarily choose to live outside reception centres, while also addressing the situation of those temporarily outside the system due to capacity constraints.

The conference brought together representatives of EU institutions and agencies, national and local authorities, reception agencies, civil society organisations and international organisations.

Discussions highlighted that EU law allows reception conditions to be provided other than in kind, while maintaining the same required standard. Regardless of the modality used, Member States remain responsible for ensuring an adequate standard of living, access to healthcare and information, and the identification of vulnerabilities.

The conference showed that alternatives to housing in kind already exist in some Member States, including cash-based support, community-based housing and mixed reception systems. These approaches may relieve pressure on reception centres and support applicants' autonomy, provided that they are accompanied by appropriate monitoring, coordination and access to essential services.

The three round tables on access to information, healthcare and an administrative address illustrated in detail the practical challenges faced by applicants living outside reception centres. Information points, first-line medical services and workable registration solutions were repeatedly identified as key elements to prevent applicants from falling out of support systems.

Overall, discussions highlighted that reception other than housing in kind must remain part of a coherent reception system. Emergency or ad hoc solutions cannot replace in-kind

reception structures, and civil society actors cannot be expected to fill structural gaps alone. A diversified and flexible reception system, grounded in rights and dignity, remains necessary to respond to current and future challenges.

## INTRODUCTION

Reception systems for applicants for international protection in Belgium and across the European Union are facing long-term structural pressure. Persistently high numbers of arrivals, combined with limited reception capacity, staffing shortages, rising infrastructure costs and administrative constraints, have made it increasingly difficult to ensure accommodation in reception centres for all applicants at all times.

In Belgium, a growing number of applicants are living outside the reception network. This group is heterogeneous. Due to capacity challenges, a number of applicants are on waiting lists for reception places. They often rely on emergency shelters or homelessness services, or temporarily stay with friends, family members, or members of their community. In addition, a growing number of applicants deliberately choose to remain outside reception centres, often because they prefer to stay with relatives or opt for independent living arrangements.

These situations raise important questions regarding access to rights and services, human dignity, and compliance with EU law. They also raise questions about autonomy, the diversity of needs, and the capacity of reception systems to accommodate different applicant profiles within a single modality.

Against this background, and building on the EMN Inform on Alternatives to providing housing in kind for international protection applicants, EMN Belgium organised a two-day Expert & Practitioner Conference on 15 and 16 December 2025 in Brussels, focusing on reception and support of applicants for international protection other than housing in kind.

## OBJECTIVES AND CONFERENCE STRUCTURE

The conference aimed to:

- explore the legal possibilities for providing reception conditions beyond housing in kind;
- assess the practical feasibility of alternative reception models, including potential risks and safeguards;
- exchange practices and lessons learned on cash-based and community-based reception;
- examine how essential services such as information, healthcare and administrative registration can be ensured for applicants living outside reception centres;

- facilitate dialogue between policymakers, practitioners and researchers.

The programme combined plenary sessions, panel discussions, and three parallel round tables, two of which included visits to the Refugee Medical Point and the Fedasil Info Point in Brussels. Speakers included representatives from EU institutions and agencies, national and regional authorities, reception agencies, municipalities, civil society organisations and international organisations.

## DAY 1 – AFTERNOON PLENARY SESSIONS (15 DECEMBER 2025)

### WELCOMING REMARKS (13:00–13:20)

The conference was opened by **Stijn De Decker, Director European and International Policy at the Belgian Ministry of Home Affairs, and Océane Crabbé, Coordinator of EMN Belgium at the Belgian Ministry of Home Affairs, and Océane Crabbé, Coordinator of EMN Belgium.**

In his opening remarks, Stijn De Decker welcomed participants and situated the conference within broader European developments. He noted that asylum and reception systems across many Member States continue to operate under sustained pressure, with reception capacity, access to services, and the organisation of support remaining key challenges. Referring to recent EMN analysis, he observed that countries have adopted a range of responses, including adjustments to reception arrangements, efforts to improve system efficiency, and the exploration of alternative approaches alongside traditional reception models.

He further underlined that the development of a new EU policy and legislative framework, together with preparations for the entry into application of the Pact on Migration and Asylum, offers an important moment for reflection and exchange. In this context, he stressed the value of evidence-based discussion and comparative learning across Member States. He concluded by outlining the conference's objectives and inviting participants to share experiences and practical insights over the two days of discussion.

In her welcoming remarks, Océane Crabbé highlighted the strong interest generated by the topic and the diversity of stakeholders represented, including reception authorities, civil society organisations, international organisations, academia, and government actors at European, federal, regional, and local levels. Emphasising the breadth of expertise in

the room, she underlined the importance of exchange and collaboration in advancing a shared understanding of both opportunities and challenges.

## SETTING THE SCENE: POLICY, LEGAL AND OPERATIONAL FRAMEWORK (13:20–15:00)



### ENSURING HOUSING FOR APPLICANTS FOR INTERNATIONAL PROTECTION OTHER THAN IN KIND – THE EU LEGAL FRAMEWORK

**Delphine Drapeau (European Commission, DG HOME)** explained that reception conditions other than housing in kind are explicitly foreseen under the EU Reception Conditions Directive<sup>1</sup> and have been part of the EU legal framework since its earliest versions. Material reception conditions include housing, food, clothing and personal hygiene products, provided in kind, through financial allowances or vouchers, or through a combination of modalities, together with a daily allowance for personal expenses. The daily allowance must be clearly distinguished from broader financial assistance linked to accommodation.

Member States are required to ensure that material reception conditions provide an adequate standard of living for applicants, which guarantees their subsistence, protect their physical and mental health, and respect their rights under the Charter. This standard applies irrespective of the modality used.

All applicants for international protection fall under the scope of the Directive from the moment an application is made and throughout all stages of the procedure as long as they are allowed to remain on the territory as applicants, regardless of where they are accommodated. Obligations related to material reception conditions, access to healthcare, identification and support of vulnerable persons, access to information and legal assistance apply equally to applicants living inside and outside reception centres.

Reception other than housing in kind was described as a modality within the reception system rather than an exemption from reception obligations.

**Evelien Barbieux, Deputy Chief of Staff to the Belgian Minister for Asylum and Migration**, presented the Belgian policy perspective and stressed the need for a realistic approach amid sustained pressure on the reception system. She recalled that Belgium continues to guarantee material reception conditions in kind through the collective reception model, which remains the backbone of the system. At the same time, complementary measures are being considered to reduce pressure on reception centres and improve the system's functioning. These include alternative forms of material

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<sup>1</sup> Directive (EU) 2024/1346 of the European Parliament and of the Council of 14 May 2024 laying down standards for the reception of applicants for international protection <https://eur-lex.europa.eu/eli/dir/2024/1346/oj/eng>

assistance aimed, where feasible, at encouraging applicants to arrange accommodation independently rather than reside in reception centres. Such measures may include targeted instruments, such as meal vouchers or other forms of support, as well as specific tools linked to voluntary return. They are intended to be temporary and targeted, and not to replace collective reception.

Evelien Barbieux also referred to outflow measures designed to reduce bottlenecks in the reception system, while underlining that guidance and follow-up for applicants living outside reception centres remain central.

She highlighted additional efforts to reduce pressure on reception centres, including the use of temporary shelters at the local level for the most vulnerable applicants, as well as the possible activation of crisis measures in situations of acute pressure.

She further indicated that Belgium will no longer provide reception to applicants who have already received reception in another EU Member State. This measure was presented as part of a broader effort to manage reception capacity and prioritise reception places for applicants for whom Belgium is responsible, in line with applicable legal frameworks.

She concluded by emphasising that reception must remain humane and credible, and that flexibility should not undermine the reception system.

## **PRESSURE ON RECEPTION SYSTEMS: PERSPECTIVE OF A RECEPTION AGENCY**

**Pieter Spinnewijn, Director-General of the Belgian Federal Agency for the Reception of Asylum Seekers (Fedasil), presented the agency's perspective.**

He recalled that ensuring quality reception in collective facilities remains Fedasil's core mandate. Over recent years, significant efforts have been made to expand reception capacity. Despite these efforts, the system continues to face structural constraints, including persistent staffing shortages, rising infrastructure and operational costs, and increasing local resistance to the opening of new reception facilities.

A majority of applicants for international protection in Belgium are currently living outside the reception network rather than in collective reception centres. This group includes applicants on waiting lists, applicants staying with family members, friends or community networks, applicants who are employed and prefer independent accommodation, and applicants supported through alternative or temporary measures.

This development reflects both capacity constraints and changing applicant profiles. While a (-shrinking-) number of applicants remain outside reception due to a lack of available places, a significant and growing number deliberately organise their accommodation

independently, valuing autonomy, proximity to social or professional networks, or continuity in their living arrangements.

Pieter Spinnewijn stressed that reception outside collective accommodation does not reduce public responsibility. On the contrary, it requires active engagement by authorities to ensure access to information, socio-legal support, access to healthcare and mechanisms to identify and monitor vulnerabilities. Without such support, applicants risk falling out of administrative and protection systems.

He underlined that strengthening structured support for applicants living outside reception centres can help preserve reception places for those most in need, particularly unaccompanied minors, families, persons with medical or psychological vulnerabilities and other applicants requiring intensive support. From Fedasil's perspective, reception outside housing in kind should be understood as a complementary modality within a broader reception system.

## **PRESSURE ON RECEPTION SYSTEMS: PERSPECTIVE OF A CIVIL SOCIETY ORGANISATION**

**Anne Bathily, General Coordinator of the Brussels Humanitarian Hub<sup>2</sup>**, presented the situation from the perspective of a civil society organisation providing front-line support.

She explained that the Humanitarian Hub operates as a one-stop, front-line facility offering unconditional daytime access to basic and specialised services, including food distribution, hygiene facilities, medical and psychological consultations, socio-legal support, information and orientation, and targeted services for women and unaccompanied minors.

Data presented showed that the vast majority of users are living in situations of homelessness or highly unstable housing, with only a very small proportion accommodated in reception centres. Most users have arrived in Belgium recently and represent a wide range of nationalities.

Anne Bathily described how the lack of access to reception has a cumulative impact on applicants' physical and mental health, dignity and capacity to engage with asylum procedures. Mental health impacts were highlighted as particularly severe and closely linked to prolonged insecurity, lack of shelter and uncertainty about the future.

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<sup>2</sup> <https://dokersvandewereld.be/projecten/humanitaire-hub>

She also highlighted systemic effects on civil society organisations. Increasing numbers of applicants living outside reception centres have led to a shift from complementary support towards substitution, with civil society increasingly providing services that would normally fall within reception systems. At the same time, funding constraints and increasingly complex needs contribute to staff exhaustion and sustainability concerns.

She concluded by stressing that while civil society plays a crucial role in providing front-line support, such initiatives cannot replace a functioning reception system.

## DISCUSSION

The discussion highlighted tensions between legal obligations and operational realities, as well as challenges related to capacity management, funding constraints and coordination between public authorities and civil society actors.

### PANEL DISCUSSION: SUPPORTING APPLICANTS NOT PROVIDED WITH HOUSING IN KIND (15:30–17:00)

Building on the EU, national, operational, and field perspectives presented earlier in the afternoon, this panel – moderated by **François Roland, Federal Migration Centre (Myria)**- examined how different Member States organise support for applicants for international protection who are not accommodated in reception centres. Contributions from the Netherlands, Poland and France illustrated a range of policy choices and operational models for maintaining contact with applicants living outside reception facilities and ensuring access to rights and services.

## THE NETHERLANDS

**Maika Boronat Lugtmeijer, Policy advisor at the Central Agency for the Reception of Asylum Seekers (COA), the Netherlands**, presented COA's approach, developed in response to high pressure on the reception system. Several regulations have been introduced to enable residents to find housing solutions outside reception facilities while continuing to receive support.

Applicants who choose to participate in one of the regulations are not considered to be outside the reception framework. They remain linked to COA and retain access to reception-related services, including healthcare coordination, information provision and guidance throughout the asylum procedure. This formal registration enables the authorities to maintain contact with applicants, monitor their situation and identify vulnerabilities at an early stage.

Applicants living outside reception centres may return to a reception facility if their accommodation (e.g. with a host family) ends or if their personal circumstances change, subject to available capacity. According to the Dutch authorities, this flexibility is essential to prevent applicants from becoming invisible to the system and to ensure continuity of support.

The Dutch model aims to balance applicant autonomy with continued public responsibility. Allowing applicants to live independently where possible is seen as supporting self-reliance, while maintaining registration within the reception system is considered crucial to safeguard access to rights and services.

## POLAND

**Daria Ezekiel, Head of the Security and Analytics Unit, Department for Social Assistance, Office for Foreigners (UdSC), Poland,** described Poland's long-standing reception model, in which the majority of applicants for international protection live outside reception centres in private accommodation.

Approximately 90% of applicants in Poland reside independently, often with family members or in rented accommodation. A lack of reception capacity does not primarily drive this approach; rather, it reflects policy choices, the availability of private housing, and the specific profiles of applicants. Applicants receive monthly financial assistance to cover basic needs, while access to healthcare and education is organised through separate systems.

Living outside reception centres does not imply reduced access to rights. The Polish authorities have put in place monitoring mechanisms to ensure continued eligibility and to identify vulnerabilities. These include regular checks and targeted home visits, particularly for families with children, single parents and applicants with disabilities or specific needs.

The Polish presentation highlighted that a system in which most applicants live independently requires clear procedures, adequate administrative capacity and regular follow-up to ensure that applicants remain connected to public services and do not fall out of support structures.

## FRANCE

**Sarah Marsouk (Ministry of the Interior, France)** presented the situation in France, where a large reception system exists, but capacity constraints mean that over a quarter of eligible applicants are not accommodated.

In France, 72% of applicants eligible for material reception conditions are accommodated within the asylum reception system through in-kind housing. When applicants staying with family or friends and those accommodated in other forms of state-provided accommodation are also taken into account, the overall share benefiting from free accommodation rises to 80%.

Those in accommodation receive housing in kind and an allowance to cover their needs regarding food, clothing and personal hygiene items, as these are not provided in accommodation centres.

All those who are not in accommodation receive not only the allowance to cover their needs regarding food, clothing and personal hygiene items, but also an additional allowance to cover their accommodation needs.

Applicants for international protection register their application at the single desk for asylum seekers, at which point their vulnerabilities are assessed by the French Office for Immigration and Integration (OFII). Based on their assessed vulnerability and the availability of places in accommodation centres, applicants for international protection are offered accommodation. Applicants for international protection who accept reception conditions are given a card onto which their allowance is paid every month. Those willing to receive accommodation but who cannot be accommodated receive the additional amount to cover accommodation costs on their card.

As a result, people outside the network are mostly young single men or couples without children.

Support for these applicants for international protection who are not accommodated is organised through local reception and orientation platforms, which assist with administrative registration, access to healthcare, information provision and preparation for asylum interviews. These platforms play a key role in maintaining contact with applicants for international protection and facilitating access to services at the local level.

There are 68 platforms across France, mostly located in the main city of the department in which they are situated. Departments that do not have a platform are mostly those where the number of applicants for international protection not in accommodation is low.

The French contribution underscored that the accommodation system is coordinated by a central operator (the French Office for Immigration and Integration), which enables coordination across regions. It acknowledged, however, that certain regions face a high number of applicants for international protection compared to the relatively limited number of available places.

## DISCUSSION

Speakers emphasised the importance of:

- maintaining formal registration and institutional contact with applicants residing outside reception centres;
- monitoring changes in applicants' circumstances and identifying potential vulnerabilities;
- ensuring effective coordination between national authorities, local actors and service providers;
- preventing situations in which applicants fall outside both reception and support systems.
- The panel highlighted that forms of reception other than accommodation in kind are already embedded in several national systems. However, their effective implementation requires clear governance arrangements, appropriate monitoring mechanisms and sustained institutional support.

## CLOSING NOTE DAY 1

The first day of the conference provided a shared framework for understanding reception beyond housing in kind, combining legal, policy, operational, and field perspectives. Discussions illustrated the diversity of national approaches, the range of applicant situations across Member States, and the structural pressures affecting reception systems.

By bringing together EU-level, national and local experiences, Day 1 highlighted both the flexibility allowed within the existing legal framework and the practical challenges associated with implementing reception modalities outside collective accommodation. These exchanges set the context for the second day of the conference, which focused in greater detail on alternative models and on access to key services in practice.

## DAY 2 – PLENARY SESSIONS AND ROUND TABLES (16 DECEMBER 2025)

### RECAP OF DAY 1 (09:00–09:15)

Day 2 opened with a recap of Day 1 by **Hanne Beirens, Professor at the College of Europe (Bruges)**, who highlighted the main messages emerging from the Day 1 discussions.

She recalled that Day 1 contributions illustrated sustained structural pressure on reception systems across Europe, combined with an increasing diversity of applicant profiles and a growing number of applicants living outside reception centres.

The recap emphasised that reception other than housing in kind should not be seen as exceptional or temporary, but rather as a structural element already present in many national systems. Presentations showed that Member States operate mixed reception systems that combine collective accommodation with financial support and alternative housing arrangements.

Hanne Beirens underlined that discussions on Day 1 also highlighted the importance of governance, monitoring and coordination. Reception modalities can only function effectively if they remain embedded in a coherent system that ensures continuity of rights, access to services and protection standards.

#### PANEL DISCUSSION: EXPLORING ALTERNATIVE MODELS (09:15–10:45)

This session – moderated by Hanne Beirens – focused on alternative and community-based reception models, examining their feasibility, added value, risks, and safeguards. The panel explored the key preconditions for establishing such models, including the role of political and public narratives in fostering a welcoming environment, the mobilisation of citizens and local communities, and the importance of decentralised approaches to accommodation. Particular attention was paid to how reception systems are embedded in local contexts and how flexibility at the municipal level can enable experimentation with new forms of accommodation. The discussion also addressed enabling factors such as municipal engagement, strong inter-municipal networks, long-standing traditions of volunteering, appropriate legal frameworks, and local housing market conditions. Two guiding questions structured the exchange: first, the factors that facilitate the development of alternative models; and second, the practices and components that should inform their future evolution.



#### ITALY – COMMUNITY-BASED RECEPTION AND MUNICIPAL INVOLVEMENT

**Sara Consolato, Advocacy Manager at Refugees Welcome Italia**<sup>3</sup>, presented experiences from Italy, where small-scale, community-based reception models coexist alongside larger collective reception facilities. She explained that these models are closely embedded in local contexts and implemented on a voluntary basis by municipalities, operating separately from initial reception in larger, centralised centres. Their flexibility

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<sup>3</sup> <https://refugees-welcome.it/>

allows municipalities to pilot innovative accommodation arrangements and, if successful, to translate them into more permanent local reception policies.

She further highlighted Italy's long-standing tradition of volunteering, organised through a wide range of actors including informal groups, faith-based organisations, and other community initiatives. This diversity of volunteer engagement enables municipalities to reach different host profiles and to adapt reception models to local realities. Sara Consolato stressed that such initiatives are most effective when complemented by professional social workers and supported by a clear legal framework. Referring to humanitarian corridors, she illustrated how structured cooperation between institutions and civil society can enable safe, organised, and rights-based reception pathways. At the same time, she underlined that hosting arrangements require careful screening, mediation, and ongoing follow-up to prevent dependency, exploitation, or informal practices that could undermine protection standards.



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## **BELGIUM – COMMUNITY SPONSORSHIP AND LESSONS FROM THE RECEPTION OF UKRAINIANS**

**Evi Vermeulen, Head of the Migrant Protection and Assistance Unit at the International Organization for Migration**, presented findings from recent comparative research on community sponsorship and hosting initiatives in Belgium, Italy, and Lithuania<sup>4</sup>. She explained that the reception of persons displaced from Ukraine since 2022 demonstrated the potential of large-scale hosting by private households when embedded in a whole-of-government approach, supported by sufficient funding and a positive political narrative. In Belgium, strong coordination mechanisms enabled the rapid mobilisation of

<sup>4</sup> <https://lithuania.iom.int/sites/g/files/tmzbd1336/files/inline-files/rise-literature-study-2.pdf>

housing solutions at the local level, drawing on solidarity across institutions and communities.

However, she noted that this experience has not been replicated for applicants for international protection, whose reception system remains largely centralised and lacks similar political framing. She referred to persistent barriers, including discrimination in the private housing market, limited landlord incentives, and insufficient mediation mechanisms. The research shows that mediation between property owners and tenants, the involvement of private-sector actors, and the availability of professional support structures significantly increase homeowners' willingness to rent to newcomers. These elements were identified as essential for making community-based reception models viable and sustainable beyond emergency contexts.

## BELGIUM – LOCAL COORDINATION AND POLITICAL LEADERSHIP

**Pierre Verbeeren, Chairman of Bruss'Help and former Commissioner of the Brussels Government for the Integration of Ukrainians**, focused on the role of local coordination, political leadership, and hospitality in mobilising alternative housing solutions and preventing homelessness. He emphasised that a positive political narrative and clear signals from the government can strongly influence participation by local actors and private individuals, reducing the need for justification and lowering barriers to engagement.

He further highlighted the effectiveness of financial incentives, such as guarantees, insurance schemes, and support for housing adaptations, in reducing hosts' perceived risks. At the same time, he warned that overly complex procedures, unclear responsibilities, and a lack of long-term perspective can discourage participation. From a homelessness prevention perspective, he stressed the importance of early intervention, continuity of support, and avoiding abrupt exits from reception systems without adequate follow-up. He also reflected on the involvement of diaspora communities, noting both their potential contribution and the need to recognise differences in experience and capacity within these communities.

## FLANDERS – LOCAL GOVERNMENTS AT THE CENTRE OF RECEPTION ORGANISATION

**Jeroen Windey, President of the Task Force for the Reception of Ukrainians and Director-General of the Agency for Home Affairs of the Government of Flanders**, described the Flemish approach to the reception of displaced persons from Ukraine. He explained that local governments were deliberately placed at the centre of reception efforts, reflecting a collective political decision and recognising their proximity to citizens, detailed knowledge of local housing markets, and capacity to mobilise local networks.

He noted that, unlike the federal approach, reception by host families was not prioritised in Flanders, partly due to concerns about vulnerability and sustainability. Instead, strong local coordination and the mobilisation of existing municipal networks proved essential. He stressed that decentralisation does not imply uniform solutions, as local needs and capacities differ significantly, and services must be tailored accordingly. According to Jeroen Windey, two elements are key to the success of alternative reception models: a clear and consistent political narrative and well-supported local governance structures embedded within a whole-of-government approach.

## **DISCUSSION**

The discussion underscored the central role of strong local governance and adequate support structures in translating political and community willingness into sustainable practice. Panellists highlighted the importance of effective coordination mechanisms, including monitoring and evaluation systems, proportionate screening and matching procedures, and continuous professional support for both hosts and applicants for international protection. Municipalities were repeatedly identified as key actors, notably in linking participants to existing services, coordinating across policy domains, and adapting approaches to local contexts.

At the same time, participants stressed that alternative and community-based reception models should complement, rather than replace, collective reception centres. The discussion emphasised the need for appropriate safeguards, clear allocation of responsibilities, and oversight mechanisms that remain firmly anchored within public authorities. While panellists agreed that the reception of Ukrainians offers valuable lessons, they also cautioned against direct replication for other groups, stressing the importance of adapting principles and practices to different legal, social, and operational contexts instead.

## **PANEL DISCUSSION: HOUSING AND FINANCIAL SUPPORT FOR APPLICANTS FOR INTERNATIONAL PROTECTION (11:15–12:45)**

This panel – moderated by Hanne Beirens – examined the interaction between housing models and financial support schemes, with a particular focus on flexibility, monitoring, and sustainability within reception systems. The session explored how financial assistance, including cash-based support, can be integrated into different reception arrangements for applicants and beneficiaries of international and temporary protection who reside outside state-provided accommodation or reception centres. Drawing on examples from EUAA, the panel set the scene by outlining existing standards, modalities, and implementation approaches in contexts such as Norway, Germany, and UNHCR-led responses in Europe.

Structured around two rounds of questions, the discussion first clarified how financial support functions within various reception models, before turning to the reasons why such systems are being pursued or reconsidered. Panellists reflected on the role of cash components in enhancing contingency planning, adaptability, and integration outcomes, particularly in times of pressure on reception systems. The session highlighted how financial support can contribute to more modular and resilient reception frameworks, while also raising questions related to cost-efficiency, local ownership, and the need to embed such measures within broader, well-coordinated reception strategies.

## EUAA – OPERATIONAL STANDARDS AND MONITORING

**Thomas Jezequel, Head of Reception and Vulnerability Sector at the European Union Agency for Asylum (EUAA)**, introduced the EUAA’s role in supporting Member States in implementing the Common European Asylum System, including through operational standards, guidance, and indicators on reception conditions. He clarified that these standards are not legally binding and do not prescribe fixed amounts of financial support. Instead, they focus on ensuring that reception arrangements—whether provided inside or outside reception centres—offer equivalent conditions and access to essential services, with Member States determining amounts and calculation methods based on national reference points such as minimum wages or social welfare standards. He highlighted that mixed reception systems require robust monitoring, including vulnerability identification and individual case management, to ensure needs are met and to allow authorities to allocate resources effectively. He also noted that, in the context of the Pact on Migration and Asylum, the EUAA is developing updated standards and indicators, with approval expected in early 2026. He underlined that Member States may increasingly be asked to provide more detailed information on the amounts of financial support granted and how these are calculated. However, it remains unclear whether such information will be publicly accessible. He further stressed that reception governance involves choices and trade-offs. While Member States retain flexibility in implementation, modalities must be calibrated to national contexts and balanced against obligations under the Reception Conditions Directive.

## UNHCR – CASH-BASED ASSISTANCE

**Giuseppe Simeon, Senior Programme CBI Officer, Regional Bureau for Europe, UN Refugee Agency (UNHCR)**, presented UNHCR’s experience with cash-based interventions<sup>[1]</sup> situating it within a longer humanitarian practice of using cash as a modality of assistance, to enable access to goods and services through local markets. He explained that, over decades of operations, cash-based assistance has been used by

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<sup>[1]</sup> <https://www.unhcr.org/what-we-do/respond-emergencies/cash-based-interventions>

UNHCR and other humanitarian actors to support a wide range of needs—such as accommodation, food, healthcare, and education—while allowing recipients to prioritize spending according to their circumstances.

In the European context, he referred to the examples of UNHCR’s large-scale programmes in Greece, implemented from 2014 to 2020 in support to refugees from Syria and in Poland, implemented from March 2022 until early 2024 in support to refugees from Ukraine. In Poland, basic needs support was provided largely through cash only, while in Greece through a mix of cash and in-kind assistance (accommodation). In the European context, cash revealed to be particularly effective at the reception stage, where market forces allowed to provide essential goods and services, at scale and quickly. He noted that UNHCR’s evaluations consistently show that cash is generally used responsibly and support beneficiaries’ dignity, autonomy, and choice. At the same time, he stressed the operational requirements behind such schemes: enablers of cash assistance include strong administrative systems, clear eligibility criteria, and appropriate monitoring. He also underlined that cash programmes are not “instant” solutions: payment systems, registration processes, and operational safeguards take time to set up. Within the EU, he observed, cash initiatives have generally been used as temporary measures; UNHCR’s involvement depends on the level of support requested by national authorities and has, in many contexts, phased out once emergency needs decreased.



## **NORWAY – CONTINGENCY ACCOMMODATION SCHEMES**

**Heidi Hylland, Senior Advisor, Reception and Return Department, Norwegian Directorate of Immigration (UDI)**, presented Norway’s experience with alternative accommodation schemes designed as contingency tools during periods of high arrivals. She outlined two programmes: a non-temporary alternative accommodation scheme (AMOT), in principle open to all applicants for international protection, subject to eligibility conditions, and a temporary programme (MAMOT<sup>5</sup>) introduced in response to arrivals from Ukraine.

She explained that participation in the non-temporary scheme (AMOT) requires applicants to have lodged their application, be registered with the police, and hold an identification number and a bank account. While the scheme is, in principle, open to all applicants for international protection, participation is limited to those with a demonstrable link to the municipality concerned. The programme remains relatively small in scale, hosting around 200 persons per year, whereas the MAMOT programme has accommodated approximately 5,000 persons annually.

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<sup>5</sup> <https://www.udi.no/globalassets/statistikk-og-analyse/proba-rapport-2024-10-evaluering-av-mamot-endig-20.08.2024.pdf>

Heidi Hylland described a model in which municipalities participate on a voluntary basis by entering into agreements with UDI and assume responsibility for providing financial support and following up on reception, including tracking and case management. Municipalities receive financial compensation to cover service provision costs, while day-to-day economic support for applicants may be determined at the local level. She stressed the importance of clear eligibility criteria, time limits, and exit strategies to avoid prolonged reliance on emergency arrangements. Beyond preparedness and flexibility, evaluations of these schemes indicate positive effects on integration and local ownership, as municipalities can adapt support to local realities and develop a stronger sense of responsibility for reception delivery. She also noted that the schemes can reduce vulnerability among applicants who prefer to reside outside reception centres but would otherwise lack sufficient means.

## GERMANY – FEDERAL STRUCTURES AND HOUSING CONSTRAINTS

**Katja Patzwaldt, Task Force on Ukraine, Federal Ministry of the Interior (BMI), Germany**, explained how Germany's federal structure fundamentally shapes reception arrangements, with responsibilities shared across different levels of governance. Upon arrival, applicants are distributed across Germany's federal states (Länder) generally according to a distribution key based primarily on population size and tax income.

She explained that all applicants are initially accommodated in collective reception facilities. Access to accommodation outside reception centres depends on several factors, including the procedural stage, local capacity, and the likelihood of a positive decision. Where this likelihood is assessed as low, applicants are required to remain in collective facilities throughout the procedure. Where it is assessed as higher, applicants may be distributed to municipal accommodation and gain access to early integration measures. This assessment is reviewed periodically to reflect changes in country-of-origin information and procedural developments. She also noted that, despite this framework, persons who receive a positive decision often remain in reception facilities longer than intended due to persistent difficulties accessing housing on the private market. Notably, this also applies to beneficiaries of temporary protection from Ukraine. While most of them have found private accommodation, a considerable (and increasing) share has needed to seek out public facilities.

Katja Patzwaldt highlighted that while German law allows municipalities to provide part of basic provisions, including accommodation, in cash, only a limited number of them makes use of this option. Ongoing housing shortages, rising rents, and prolonged stays in reception facilities are factors leading to a stronger emphasis on collective accommodation upon arrival. She cautioned that cash support alone cannot resolve structural housing constraints and may generate unintended effects, such as encouraging

applicants to move to regions with lower rents but limited employment opportunities, potentially undermining integration objectives and creating new regional imbalances.

As a result, Germany currently relies on a mixed system combining accommodation and services in kind with limited financial assistance, often delivered through payment cards that can only be used within a defined geographical area. This approach reflects a broader reluctance to expand unrestricted cash provision, driven by the need for authorities to maintain oversight of applicants' place of residence. She emphasized that ensuring such oversight is essential for planning, coordination, and the effective management of reception capacity within the German system.

## DISCUSSION

The discussion reinforced that no single housing or financial support model can be applied universally. Panellists agreed that mixed reception systems combining accommodation in kind with targeted financial support offer the greatest flexibility in responding to fluctuating arrivals, provided that strong monitoring, coordination, and safeguarding mechanisms are in place. Ensuring continued access to essential services and clear points of contact for applicants was seen as critical to the functioning of reception outside collective facilities.

The panel further highlighted that housing and financial support measures must be embedded within broader reception strategies and remain complementary to collective reception systems. These reflections fed directly into the afternoon round tables, which focused on three practical preconditions for reception outside housing in kind: access to information, access to healthcare, and access to an administrative address.

## ROUND TABLE – ACCESS TO INFORMATION

This round table examined how applicants for international protection living outside reception centres access information on their rights, obligations and available services, and how information provision is organised in practice.

**Delphine L'Homedet, Coordinator of the Fedasil Info Point**, presented the role of the Info Point as a first-line information service for applicants not accommodated in reception centres<sup>6</sup>. Fedasil, in close collaboration with Caritas, provides information on reception rights, international protection procedures, access to healthcare, social assistance, voluntary return, and referrals to specialised services. Staff reported a steady increase in

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<sup>6</sup> <https://www.fedasil.be/en/news/reception-asylum-seekers/fedasil-info-point-celebrates-its-second-anniversary>

visitor numbers, with many applicants arriving shortly after registration or following referrals from civil society organisations.

A recurrent challenge identified was the high level of misinformation among applicants, often stemming from informal sources, social media, or word of mouth. This frequently requires staff to first correct misunderstandings before providing guidance. Capacity constraints were noted, with limited time available per individual and increasing question complexity.



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**Jorge Gomez, Project Coordinator of the Fedasil Reach Out team<sup>7</sup>,** described its mobile outreach activities in public spaces, parks and informal gathering places. The objective is to establish first contact with applicants for international protection and migrants in irregular stay who do not actively approach institutional services. Outreach workers emphasised the importance of trust-building, repeated contact, and visibility. Challenges include

language barriers, limited access to interpretation services, difficulties in ensuring follow-up when applicants move frequently, and the absence of a designated contact person able to provide continuity of support.

**Amna Shaddad, Coordinator, Social and Administrative Information Service (SISA)** highlighted the administrative overload faced by applicants living outside reception centres. Many applicants struggle to understand letters from authorities, deadlines, and procedural steps, particularly when facing the precarity and violence of sleeping in the streets instead of reception centres. SISA uses several methods to provide information, including group information sessions to address recurring issues efficiently, however it was stressed that individual follow-up remains indispensable due to complex personal situations, vulnerability profiles, and frequent changes in legal or housing rights.

**Evi Voet, Coordinator of the Team Asylum and Refugees at the City of Ghent,** presented the local one-stop-shop model in Ghent, which aims to centralise information provision and referrals at the municipal level. The model enables early identification of gaps in service access and facilitates coordination between local and federal actors.

<sup>7</sup> <https://www.fedasil.be/fr/reach-out-donner-des-informations-aux-migrants-difficilement-accessibles>

However, the city stressed that such initiatives depend on stable funding, sustained political support, and a clear division of competencies with federal authorities.

Discussions highlighted that information provision for applicants outside reception centres remains fragmented. Participants pointed to the digital divide, limited literacy, language barriers, and frequent changes in applicants' legal and housing situations as structural challenges. Information points, outreach, and local coordination were repeatedly identified as indispensable complements to digital tools.

## ROUND TABLE – ACCESS TO HEALTHCARE

The round table on access to healthcare examined access to first- and second-line medical and mental healthcare for applicants for international protection living outside reception centres. Discussions focused on administrative and practical barriers to care, system capacity constraints, and the impact of housing instability on health outcomes.

**Sarah Lagneaux, Interim Medical Advisor in the Social Services Department of the Belgian Red Cross**, opened the session with a presentation on the **Refugee Medical Point (RMP)**, a first-line medical centre managed by the Belgian Red Cross and funded by Fedasil. The RMP provides medical, psychological, and nursing consultations for applicants living outside reception facilities and plays an important orientation role by referring patients to healthcare providers and social services, supported by intercultural mediators who cover around 10 languages.

Operational data showed a sharp increase in consultations in 2025, with daily peaks exceeding 100 patients. Medical consultations accounted for the majority of visits, followed by psychological and administrative consultations, reflecting significant unmet needs for both healthcare and information. RMP highlighted growing mental health needs, barriers to specialised care, language challenges, and difficulties in ensuring continuity of care due to unstable housing and frequent mobility.

**Lien Bruggeman, National Health Coordinator at Fedasil**, provided an overview of different applicant categories and their implications for healthcare access, including applicants on waiting list for reception places, those living at a private address, those who leave reception voluntarily, and applicants excluded from reception under recent legislative changes. Fedasil presented upcoming reforms related to affiliation with the CAAMI, expected to simplify administrative procedures, improve clarity for healthcare providers, and reduce refusals of care by enabling immediate verification of coverage. Participants nevertheless stressed that administrative simplification alone will not resolve structural capacity shortages in healthcare services.

**Noémie Grailet, Coordinator of the TOOLINE1 Project<sup>8</sup> at Médecins du Monde**, highlighted the structural health impacts of non-reception and housing instability, describing housing as a key social determinant of health. She stressed the lack of continuity between registration as an applicant for international protection and access to Fedasil services, particularly for “no show” applicants, due to limited and unsystematic information at registration with the Immigration Office and the absence of automatic registration on reception waiting list. Delayed access to care was reported to increase treatment complexity and costs, while emergency accommodation was seen as incompatible with recovery and continuity of care. Médecins du Monde called for early and systematic information provision, automatic waiting-list registration, immediate health screening at the moment of application, decentralised information points, and non-discriminatory access to healthcare supported by clear guidelines and training. Concerns were also raised about fragmented financing and gaps in coverage during transitions between legal statuses, with a need for centralised health coverage mechanisms and improved coordination between Public Centres for Social Welfare, Fedasil and health insurance funds.

**Bram Spinnewijn, General Practitioner at Praktijk aan de Stroom (Antwerp)<sup>9</sup>**, presented the Praktijk aan de Stroom initiative and illustrated how multidisciplinary cooperation, digital tools, and temporary medical practices can help address gaps in first-line care in underserved areas. He emphasised that integrated cooperation between medical and social services is fundamental to the provision of tailored care and, while potentially more cost-effective, is unquestionably more efficient than the current fragmented system in which actors largely operate in isolation. The initiative demonstrated how data-driven approaches and flexible staffing models can improve access, while also raising concerns regarding sustainability, staff workload, reliance on short-term funding, and limited scalability without structural support.

Discussions concluded that healthcare actors are increasingly compensating for gaps in reception systems, despite lacking the mandate or resources to address underlying housing instability. Participants stressed that healthcare services cannot replace reception structures, and that stable housing and social support remain essential preconditions for adequate and sustainable access to healthcare.

## ROUND TABLE – ACCESS TO AN ADMINISTRATIVE ADDRESS

This roundtable examined access to an administrative address as a prerequisite for exercising rights and accessing services.

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<sup>8</sup> <https://dokersvandewereld.be/projecten/tooline1-antwerpen>

<sup>9</sup> <https://praktijkaandestroom.be/>

**Elias Abdullah, Coordinator of the Housing Team at Fedasil**, explained that applicants accommodated in reception centres are automatically registered at the address of their reception centre. Applicants living outside reception centres often lack such an address, creating barriers across multiple domains (including obtaining official documentation, accessing the labour market, etc.). The current registration possibility at the Immigration Office was described as a temporary measure, in place for six months.

Elias indicated that, rather than pursuing legislative change to enable reference addresses for applicants for international protection, Fedasil's current focus is on facilitating cohabitation solutions, drawing on elements of the temporary protection framework applied to Ukrainians.

**Fabienne Crauwels, Immigration Policy Officer at the Association of Flemish Cities and Municipalities (VVSG)**, highlighted several challenges in the functioning of the registration system, including coordination and information flows among different actors. While registration at a reference address may be possible in certain cases for beneficiaries of international protection without a previous main residence in Belgium, its application varies in practice, partly due to differing levels of awareness at the local level. Divergent interpretations of homelessness were also noted, with municipalities and Public Centres for Social Welfare applying different assessment criteria based on their respective mandates. Local social services referred to capacity constraints and expressed differing views on the appropriate level of responsibility for supporting applicants outside the reception structures. In addition, uncertainties regarding the potential impact on social benefits were mentioned as factors that may discourage individuals from offering accommodation.

**Nawa Youssouf Ali, Legal expert at the Association for the Rights of Foreigners (ADDE)**<sup>10</sup>, presented a legal analysis of the situation, noting the limited scope for legislative change in the current context. She outlined the possibility of addressing access to an address through judicial procedures, particularly in relation to access to the labour market. ADDE also referred to differences in treatment between applicants with and without access to an address.

**Across all sessions, strong interconnections were identified between housing, access to information, healthcare and administrative registration. Gaps in one area often lead to difficulties in others, underscoring the need for coordination among actors and across governance levels.**

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<sup>10</sup> <https://adde.be/>

## CLOSING NOTE DAY 2

The second day of the conference deepened the discussion by examining alternative reception models and their interaction with access to information, healthcare, and administrative registration. Through plenary exchanges and roundtable discussions, participants explored how reception outside housing in kind is experienced and managed in practice.

Day 2 discussions underscored the interdependence between accommodation modalities and service access, highlighting the importance of coordination, monitoring, and the continuity of support. Together with the reflections from Day 1, these exchanges contributed to a comprehensive overview of current practices, emerging approaches, and ongoing challenges related to reception other than housing in kind across different contexts.

## FINAL REFLECTIONS AND CLOSING REMARKS

Over the two days of discussions, the conference provided a detailed, practice-oriented overview of how reception and support for applicants for international protection are organised when housing in kind is unavailable or not used.

Across all sessions, it became clear that reception other than housing in kind is not an abstract or marginal phenomenon, but a structural reality in some Member States. It takes different forms and is shaped by legal frameworks, housing markets, governance structures, and applicant profiles. In several contexts, it reflects not only capacity constraints but also deliberate choices by applicants who organise their own accommodation.

The discussions highlighted that EU law allows for different modalities of reception, while maintaining the same obligations regarding an adequate standard of living, access to healthcare, access to information, and attention to vulnerability. Reception outside collective centres was consistently described as a modality within reception systems, rather than an exemption from reception obligations.

Presentations and exchanges illustrated the diversity of national approaches, including collective reception, financial support schemes, community-based models, and mixed systems. While these approaches differ, they all require mechanisms to maintain institutional contact with applicants, monitor changing circumstances, and ensure continuity of rights and services.

The round tables provided concrete insight into how reception outside housing in kind translates into daily practice. They showed that access to information, healthcare, and administrative registration are closely interconnected, and that gaps in one area often lead to difficulties in others. Physical access points, outreach, first-line medical services, and workable registration solutions were repeatedly identified as essential to preventing applicants from falling out of support systems.

Across both days, participants also reflected on the role of civil society and local actors. While their contribution was recognised as essential, discussions highlighted the limits of substitution and underscored the importance of clear public responsibility, coordination, and sustainable frameworks.

Overall, the conference offered a space for open exchange among policymakers, practitioners, researchers, and field actors, enabling the sharing of experiences, challenges, and operational realities across different contexts and levels of governance.

## ACKNOWLEDGEMENTS

EMN Belgium would like to thank all speakers, moderators, and participants for their valuable contributions to the conference. The depth and quality of the discussions were made possible by the openness with which experiences were shared and by the constructive exchanges across disciplines and national contexts.

Special appreciation is extended to the speakers and panellists for their expertise and practical insights. EMN Belgium also wishes to thank Fedasil for its input and expertise throughout the conceptualisation and organisation of the conference, as well as the moderators for their careful facilitation of the discussions over the two days.

EMN Belgium also warmly thanks all participants who took part in the conference in Brussels and online, whose questions and reflections enriched the debates and contributed to meaningful and substantive exchanges.