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# How ‘Special’ is the Special Law? Temporary Protection and Migration Infrastructure in Poland Following the Outbreak of the Full-Scale War in Ukraine

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*This article analyses how actors involved in migration infrastructure in Poland responded to the introduction of the Act of 12 March 2022 on Assistance to Citizens of Ukraine in Connection with the Armed Conflict on the Territory of the Country (referred to as the ‘Special Law’) and how Ukrainian migrants themselves interpreted its implications. Although this Act established new legal protection for forced migrants, its application revealed significant limitations, including ambiguous enforcement mechanisms. This resulted in operational uncertainty for implementing organisations. Organisations with existing connections to migration infrastructure and past refugee assistance experience were able to quickly understand the new requirements by using established networks. Meanwhile, migrant organisations and social-media platforms emerged as the most effective channels for communicating essential information to forced migrants.*

*Keywords: forced migration, migration infrastructure, Poland, Special Law, temporary protection status, Ukraine*

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## Introduction

Drawing on refugee and labour-migration studies, this article analyses the response of migration infrastructure actors to the introduction of a new law in Poland, the *Act of 12 March 2022 on Assistance to Citizens of Ukraine in connection with the Armed Conflict on the Territory of the Country*<sup>1</sup> (referred to as the ‘Special Law’) and the reflections of Ukrainian migrants on this legal and infrastructural context. The analysis considers the experience of both those migrants who fled to Poland after the war broke out and were directly covered by this act, as well as those who were caught by the war during their labour migration. By migration infrastructure, we understand ‘institutions, networks and people that move migrants from one point to another’ (Lindquist, Xiang and Yeoh 2012: 8–9), attempting to facilitate the process through ‘infrastructuralisation’ but facing the risk that the interplay between different dimensions of migration infrastructure ends up constraining people’s migratory prospects. In this article, we use the term ‘Special Law’ (in Polish *specustawa*), a term from legal jargon that has been adopted in the media, public discourse and politics. The Special Law (like other laws referred to in this way) is, in terms of procedure for its enactment or amendment, an ordinary law (see, for example, Zaliwski 2018). However, the act’s popular name captures the fact that it was designed in response to an emergency – the outbreak of the full-scale war in Ukraine – and offers an alternative and unprecedented path to people seeking refuge in Poland. As we further argue in this article, the act has distinctive qualities compared to the Temporary Protection Directive.

With the full-scale invasion of Ukraine by Russia on 24 February 2022, the Polish authorities were confronted with the need to respond to a situation without precedent in the region’s recent history. This was because the first, tangible consequence of the massive air and missile attacks targeting virtually all major Ukrainian cities and critical infrastructure was the mass flight of the civilian population, for obvious geographical reasons, towards Poland (Jaroszewicz, Grzymiski and Krępa 2022). From one day to another, Poland – which was a key destination for Ukrainian temporary workers – became one of the main destinations for forced migrants from Ukraine. Until February 2024, the war forced 6.5 million people to be internationally displaced (UNHCR 2024), constituting the fastest-growing displacement crisis since the Second World War. It was clear that the administration in Poland – the country having the longest border with Ukraine and with over 100,000 people already crossing it by 28 February 2024 – could not proceed quickly enough with applications for international protection. The Special Law was intended to enable the rapid provision of protection to over 1 million people, mainly women and children, by the end of March 2022 (Duszczuk and Kaczmarczyk 2022).

Although the Special Law did not have the word ‘protection’ in its name, this law was the basis for granting temporary protection. This was a surprising turn, that a quickly formulated act could practically equalise the temporary rights of those seeking refuge to those of Poles, in contrast to the increasing restrictiveness and even refusal to grant protection in previous years under the existing law<sup>2</sup> (Klaus, Lévy, Rzeplińska and Scheinost 2018; Narkowicz 2018; Pawlak 2022). The Special Law, although a state-specific act, was enacted almost simultaneously with and as a response to the unexpected activation of the Council Directive 2001/55/EC of 20 July 2001 on minimum standards for giving protection in the event of a mass influx of displaced persons and on measures promoting a balance of efforts between Member States in receiving such persons and bearing the consequences thereof (hereinafter, the Temporary Protection Directive or TPD)<sup>3</sup> by the Council Implementing Decision 2022/382. As some authors have claimed, the Polish Special Law on temporary protection is not fully compatible with the corresponding EU law (Łysienia 2023). Such considerations are all the more justified given that, according to Art. 2(6) of the Special Law, ‘A citizen of Ukraine (covered by the

operation of the Special Law) is considered to be a person enjoying temporary protection in Poland within the meaning of Article 106(1) of the Act of 13 June 2003 on granting protection to foreigners within the territory of the Republic of Poland'. In contrast to the TPD, only Ukrainian nationals who had a legal right to stay on Polish territory from 24 February 2022 onwards due to the hostilities in Ukraine, were recognised as persons benefiting from temporary protection in line with the Special Law.<sup>4</sup>

This article examines how the Special Law, with its temporary solutions, may have affected the migration infrastructure supporting Ukrainian nationals seeking or already granted temporary protection. Our interest is piqued by the fact that, apart from the experience of a few administrative officials, NGOs and migrant organisations, many new institutions have been established. The majority of organisations had to reorient themselves towards assisting forced migrants and learn what this unique legislative context means in practice in a limited timeframe. Our focus is on the main provisions of the Special Law, how the migration infrastructure responded to them and the major amendment to the law in mid-2024. This provides readers with the most up-to-date picture possible of Polish legislation on temporary protection. This new legal framework gives Ukrainian nationals greater access to labour and social rights in Poland than to third-country nationals, who enter on temporary visas or employment schemes. Nevertheless, we consider how this new temporary status could lead to a liminal experience (Turner 1987), which could affect the social and economic situation of the people affected by it. The fundamental uncertainty of this temporary status of protection is visible in the renewals announced just a few months before the law is about to expire. We analyse the consequences of the Polish state introducing this new law for each dimension of the migration infrastructure.

### **Literature review and theoretical framework**

With our article, we contribute to the body of literature analysing temporary migration policy schemes in general and forced migration in particular, focusing on the regulatory dimension of the migration infrastructure. We begin the literature review by presenting studies on labour migration concerning guestworker programmes and the (non)activation of temporary protection measures in Europe. We then move on to the most recent studies on the regulatory response to forced migration from Ukraine.

Until recently, the state-defined temporariness of legal statuses was mainly characteristic of labour migration (Cook-Martín 2024). There is continued enthusiasm for temporary migrant workers' programmes, also known as guestworker programmes, with policymakers claiming that this form of mobility results in 'triple-win' outcomes for migrants, as well as for destination and sending countries (Castles and Ozkul 2014; Constant, Nottmeyer and Zimmermann 2013; Vertovec 2007). However, critics view these programmes as part of a long-standing pattern dating back to the mid-19th century, where governments use temporary legal status as a tool to control foreign labour and discourage permanent immigration (Boucher and Gest 2015; Cook-Martín 2024; Parreñas and Silvey 2021). Programmes for temporary migrant workers, which offer few or no paths to integration, create disparities based on gender, ethnicity and social class. These schemes typically prevent workers from bringing their families, deny them opportunities for permanent residence and use their temporary status to maintain control over both migrant and local workers (Cook-Martín 2024; Hernández-León, Hernández and Paniagua 2022; Iskander 2021; Parreñas 2015). A partly similar (un)intended outcome may result from temporary protection schemes such as the TPD or the Special Law, which are designed to add those under protection temporarily to the society and labour market – a non-durable solution; they are admitted with the understanding that they will return to their country when the war ends. Although migrants under such schemes often arrive with their families and are given far greater access to rights

than migrant workers, they are kept in limbo, making the potential turn towards a more stable status unattractive and, as a result, rendering them vulnerable to labour exploitation (Burciaga and Malone 2021; Menjívar 2006; Menjívar, Agadjanian and Oh 2022).

Numerous studies have analysed why the European Union refused to activate the Temporary Protection Directive for more than 20 years (Beirens, Maas, Petronella and van der Velden 2016; Ineli-Ciğer 2016, 2018; Koo 2018). Following the activation of this Directive, scholars highlighted the double standards in comparing past refusals with current justifications for providing Ukrainian nationals with temporary protection under these measures (Carrera, Ciger, Vosyliute and Brumat 2022; Costello and Foster 2022; Ineli-Ciğer 2022). Researchers analysed why the Polish authorities decided to create a new temporary protection mechanism in a hurry, despite the existence of a protection act on foreigners (Andrejuk 2023; Jaroszewicz *et al.* 2022; Klaus *et al.* 2022). Although the initial justification was not only to facilitate the protection at a national level (Jaroszewicz *et al.* 2022) and offer a greater scope of protection than under the EU law (Grzelak-Bach 2022), scholars actually pointed out quite the opposite – it provided less protection in some areas, diverging from the minimum standards (Łysienia 2023). Researchers claim that, despite the amendments, neither the Special Law nor the Temporary Protection Directive are clear documents (Łysienia 2023). The majority of the research on the situation of forced migrants from Ukraine – in Europe in general or in Poland in particular – analyses social attitudes towards these people (Weisser 2023), local aid responses (Gaweł Mroczek-Dąbrowska, Marcinkowski and Kania 2024), the response of the welfare state (Necel 2025), the forced migrants' everyday experiences and their intentions to settle (Shelest-Szumilas and Wozniak 2024) or to return to Ukraine (van Tubergen, Wachter, Kosyakova and Kogan 2024). In this paper, we analyse the regulatory framework – i.e. the Special Law – and the various actors involved in migration infrastructure in this specific context.

This paper adopts the theoretical framework of a critical approach to migration infrastructure. According to the growing body of migration research, which adopted the 'infrastructural turn', the legal dimension is part of the migration infrastructure, framing the relationships among states, employers, workers, labour brokers and civil society (Düvell and Preiss 2022; Lubberhuizen 2024; Matuszczyk, Salamońska and Brzozowska 2022; Tazzioli 2024; Wessendorf and Gembus 2024; Xiang and Lindquist 2014). Xiang and Lindquist refer to the regulatory dimension of the migration infrastructure, which includes the state apparatus and various procedures, including rules governing entry, residence and employment access, as well as their enforcement mechanisms. Other dimensions include the commercial one (labour recruiters or intermediaries), technological (for example, transport and social media), humanitarian (non-governmental and non-profit organisations) and social (networks). Xiang and Lindquist (2018) take a more critical look at migration infrastructure with the concept of 'infrastructural involution', which suggests that the interplay between its different dimensions makes it a continuous and self-serving process, thus constraining rather than boosting people's migratory prospects. Despite the efforts of 'infrastructuralisation' to simplify migration processes, these latter have become more complex. This complexity often requires migrants to rely on new actors within the system, such as micro-influencers (Wanicka 2024). As Xiang and Lindquist write, this process 'makes migrants more protectable – for instance through comprehensive identity registration and by putting in place hearing systems to process migrants' complaints upon return – but not necessarily protected' (2018: 752). The term 'infrastructuralisation' allows a greater focus on the process: 'a set of indeterminate practices that unfold through unpredictable encounters among diverse and transregionally located actors, bureaucratic objects, and impractical procedures contingent on

institutional cultures and constant (mis)interpretation at varying degrees' (Shrestha and Yeoh 2018: 664–665).

The migration infrastructure framework was primarily employed for analysing labour migration with a focus on the commercial dimension, although there were a few exceptions (Matuszczyk and Kowalska 2024; Tazzioli 2024). According to this framework, the Special Law is part of the regulatory dimension of the infrastructure. Building on this body of literature, our article analyses the impact of this particular regulatory dimension on the commercial, technological, humanitarian and social aspects of migration infrastructure.

### **The context of migration between Ukraine and Poland: From labour to forced migration and from unregulated to regulated temporary movement**

Following the dissolution of the Soviet Union in the 1990s, restrictions on international mobility were relaxed and Poland became an important destination for Ukrainian migrants. Regarding formal access to the labour market, until 2006, migrants without a permanent residence permit in Poland could work legally only after receiving a work permit, which was a costly and time-consuming procedure. A crucial step towards more liberal access to the labour market, which also covered Ukrainian nationals, was the introduction of a simplified procedure of employment on a short-term basis in agriculture, based on an employer's declaration, without an obligation to obtain a work permit for a foreigner and without the need for a labour-market test (Górny and Kaczmarczyk 2018; Szulecka 2016). From 2007, more sectors were covered by the legislation. What we have witnessed over time in Poland is a change from unregulated, informal migration based on social networks to more-formalised labour migration, following a rapid growth of private labour-market intermediaries (Fiałkowska and Matuszczyk 2021; Kindler and Szulecka 2022). However, migrant workers in Poland faced restricted access to welfare services, including employment support (Pawlak and Lashchuk 2020). They also had very limited possibilities for settlement, as the Act of 12 December 2013 on Foreigners,<sup>5</sup> which provides regulations on granting and altering the temporary residence and work permits, requires the migrant to have a source of stable and regular income sufficient to cover his/her subsistence expenses and those of dependent family members and the obligation to have a place of residence. In 2014, with Russia's war on the Ukrainian provinces of Donbas and Luhansk and the annexation of Crimea, Poland began to see a change in the scale and character of the Ukrainian migrant population, with more families arriving and with migrants having more of a settlement outlook (Drbohlav and Jaroszewicz 2016; Górny and van der Zwan 2024). As in the 2010s, laws concerning settled migration were not liberalised in Poland; thus, the switch from a temporary to a longer-term perspective of stay was linked to the war context, with little to no hope for a quick improvement of the political and economic situation in Ukraine (Górny and van der Zwan 2024). Very few Ukrainian nationals received refugee status at that time (Jaroszewicz 2015; Szczepanik and Tylec 2016).

With the refugee status applications being rejected, most of those who arrived after 2014 for the first time turned to the entry routes used by labour migrants. Between late 2013 and early 2018, there was a dramatic surge in Ukrainian migration to Poland. By 1 January 2018, the total number of residence cardholders in Poland witnessed a fourfold increase from 2013 levels. However, these residence-card statistics only tell part of the story. The true scale of foreign labour migration to Poland is better illustrated by workplace documentation, with over 1.8 million employers' declarations issued of their intention to employ a foreigner, mainly for seasonal work (of which 94 per cent were for Ukrainian citizens) – a remarkable sevenfold increase in the number of work authorisation documents issued to

foreigners in Poland when comparing 2017 employment-related documents to 2013 figures (Górny and Kindler 2023). With the arrival of people fleeing Ukraine due to the full-scale war and the introduction of the Special Law, a new chapter was opened when it came to the access of Ukrainian nationals to Polish territory, social services and the labour market.

The characteristics of the fleeing population differed from those of previous years. The population was predominantly made up of children, women and the elderly. Many of the women had little or no experience of migration and originated mainly from the central, southern and eastern regions of Ukraine (Andrews, Isańskim Nowak, Sereda, Vacroux and Vakhitova 2023; Jarosz and Klaus 2023). Research findings on Ukrainian social networks in Poland show mixed results. A study found that over 40 per cent of Ukrainians who arrived after the full-scale war began had existing contacts with either Ukrainians or Poles in Poland (Andrews *et al.* 2023). However, a separate survey conducted in mid-2022 reported lower numbers: 33 per cent of respondents had family or relatives in Poland, while only 24 per cent had friends or acquaintances there (Jarosz and Klaus 2023). However, apart from the initial mobilisation of Poles to provide aid to those who fled, the role of the Ukrainian community in Poland was crucial, as was the Ukrainian ethnic minority. An important role was also played by social organisations that were active in the field before the outbreak of the war, together with ‘those that were established or reorganised after that date. The first group had years of experience working with migrants and migrant women, local communities, local and government institutions, international organizations, and sponsors’ (Jarosz and Klaus 2023: 56). Summing up, we are witnessing, in Poland, a continued development of migration infrastructure, with the inflow of more than 1 million people after February 2022 dynamically speeding up the process.

## Methodology

Our analysis is based on data from the project ‘Accessing Migration Infrastructure and Employment Strategies in a Time of Crisis: Ukrainian Female War Refugees and Migrants in Poland and Italy’, financed by the National Agency for Academic Exchange (NAWA) Urgency Grants and approved by the Centre of Migration Research (CMR) Ethics Committee at the University of Warsaw. The methods included an analysis of documents and legal regulations (using the comparative method of legal research), with a focus on the Special Law in the context of the TPD, such as providing access to suitable accommodation, social assistance, aid in obtaining a livelihood, providing medical care and ensuring access to education for persons under the age of 18. The data collected during the project by a CMR-based research team between March and October 2023 in Poland consisted of 43 semi-structured qualitative interviews with Ukrainian forced migrants and migration-infrastructure actors. These 43 interviews included:

1. 13 interviews with migration-infrastructure actors, including 3 central and local administrators, 3 from civil society, 1 labour-union representative, 2 from legal offices specialising in migration, 2 intermediaries and employers’ associations and 1 migration expert. Of these infrastructural actors, only 2 have dealt in the past with issues related to refugee assistance. The interviewees were selected based on purposive sampling due to their functions and the visibility of their practice within the research field. All were active in cities. We were unable to reach any formal institutions from rural areas. The interview guide concerned the past and present involvement of migration-infrastructure actors in assistance to forced migrants, their opinion about the role of the different dimensions of migration infrastructure, as well as past and present challenges

- for migrants in the labour market and the differences between their experiences before and after the outbreak of the full-scale war;
2. 15 interviews with Ukrainian women working in the domestic sector in Warsaw and its vicinity (the majority of interviewees arrived for the first time in Poland after the full-scale war; 12 of these interviewees arrived with children); and
  3. 15 interviews with Ukrainian women working in the agricultural sector (the majority were labour migrants, 6 with children in Poland) in the Mazowieckie and Śląskie voivodeships. We included pre-2022 labour migrants, as many of them were covered by the Special Law (they returned to Ukraine, re-entered Poland and applied for the relevant documents) and they also gave us a benchmark on how the situation of migrants from Ukraine has changed due to the introduction of the new act.

Interviews with migrant women were selected based on snowball sampling techniques. After having received the consent of the research participants, all interviews were recorded, transcribed and anonymised. The interviews lasted from 1 to 2 hours. The interview guide concerned their legal status, including access to rights and services in the cases of those under Special Law protection, their labour migration experience and the role of migration infrastructure throughout their migration experience. The interviews were carried out in Ukrainian, Russian and Polish. We applied open coding, with new codes added during immersion into the research field, using the Atlas.ti programme. The different migration experiences of the interviewees in the 2 sectors – domestic work and agriculture – affected the data collected. Qualitative research material allows the identification of particular mechanisms – in this case of how both migration-infrastructure actors and forced-migrant women function within a new legal environment. Due to the period in which the research was conducted (March–October 2023), the interviewees did not have an opportunity to reflect on the continuous amendments of the law after October 2023.

### **The Special Law: Its functioning in the Polish legal order and in the experiences of practitioners and migrants**

#### *Rights offered to Ukrainian nationals by the Special Law: A changing picture*

Before considering the Special Law, it should be noted that the legislator intended it to function alongside the legal acts already in force, particularly the Act on Foreigners<sup>6</sup> and the Act on Granting Protection to Foreigners on the Territory of the Republic of Poland (Sejm RP 2023).<sup>7, 8</sup> Apart from ensuring legal residence for Ukrainian nationals who arrived in Poland after 24 February 2022 – as the act refers to forced migrants – the general assumption made by the legislators, when creating the Special Law, was to temporarily equalise the status of Ukrainians with that of Polish citizens in many spheres of everyday life. An expression of this and, simultaneously, a means of realising the resulting rights, was to assign the forced migrants, in a simplified and rapid procedure, a PESEL (Universal Electronic Civil Registration System) number.<sup>9</sup> In Poland, this number is used as the main way to identify residents when they are dealing with the state. For migrants, having this number was particularly important because it enabled them to receive social benefits, access public healthcare and enter the labour market.

In this latter area, in particular, the Special Law has provided for a number of solutions indicating Poland's intention to develop its policy. Already, in its original wording, there were regulations concerning the extension of the legal time for the provision of harvest assistance (Article 40), the possibility

to employ as an academic teacher (without the normally required competition procedure), a citizen of Ukraine who declares that, on 24 February 2022, he or she worked as an academic teacher in a university operating on the territory of Ukraine and possesses an academic degree and qualifications to hold the position (Article 46), facilitation of entry into the profession of doctor and dentist for Ukrainian citizens who obtained their qualifications outside the European Union (Article 61) and an analogous solution for these persons to practice the profession of nurse or midwife (Article 64). Shortly thereafter, the legislator added Article 23a, according to which war refugees, as well as citizens of Ukraine who are legally residing in Poland on another legal basis, may be employed in auxiliary and service positions in local government units and state offices.<sup>10</sup> The Polish mining industry was also thought of by introducing the recognition of mining qualifications acquired in Ukraine and the possibility of employing such professionals in the Polish mining industry in positions corresponding to their qualifications (Article 23b).<sup>11</sup>

It must be emphasised that, compared to the EU's Temporary Protection Directive or TPD, temporary protection under the Special Law had a narrower subject scope, limiting itself to Ukrainian citizens and thus leaving out people with citizenship of other countries also fleeing war-torn Ukraine. However, as one of our interviewees – a migration expert – said, the TPD did lay out the direction for the Special Law:

*I think the government used the Directive to create conditions for refugees, which were good and are still generally good. But so that it doesn't, (...) become a very strong attraction or stimulation to stay in Poland in the end. (...) It seems to me, for the most part, that the [Special] law was set up at the dictates of the Directive. (...) On the other hand, of course, the government will always declare that it has created a Special Law [distinct from the Directive].*

As we can see from this citation, one of the directions was to ensure the temporariness of stay and that all Member States propose more or less similar rights – i.e. not to make the stay in one country more attractive than in another. As confirmed also in other research (Łysienia 2023), the Special Law differed from the TPD. For example, providing forced migrants with a PESEL number was a specific solution of the Special Law. Also, providing subsidies for people who took migrants into their homes was a solution that went beyond the TPD's requirement for the state to provide accommodations. On the other hand, unlike the Special Law, the TPD guaranteed protection for those without Ukrainian citizenship who fled the invaded country.

The Special Law was initially issued for a year but was regularly extended. At the moment of writing this article, it was to remain in force until 30 September 2025.<sup>12</sup> The extensions were usually announced within a short time lapse with the TPD. It was unclear what the government's plans were after the Special Law.

Among the interviewed Ukrainian women, a clear difference is visible between those who were protected by the Special Law and those with a long-term migration experience in the 2 labour-market sectors. For the seasonal workers in agriculture we interviewed, who have been circulating for years between western regions of Ukraine and Poland, the mobility restrictions linked to PESEL UKR (it is only possible to be outside Poland for up to 30 days without losing the status) limits its attractiveness. The existence of this problem was pointed out, among others, in the ACAPS (2023) report and this also aligns with findings from research in Germany (Andrews *et al.* 2023). These agricultural workers preferred to continue circulating between Poland and Ukraine, where they have family members (often children) left, on a similar basis as in the past, using the simplified procedure. As one of the interviewees commented:

*Because I can't work like this for a whole year without going away, well, because how do I... for example... It suits me... 3 months here, 3 months at home. And legally, you have to sit the whole year almost [in Poland].*

In contrast, the interviewed migrant domestic workers found the PESEL UKR status attractive, as they spent most of the year working in Poland – their occupation not linked to the seasonal harvest – and they left only for short, one- or two-week holidays to check on their house and family back home. Those who continue circulating based on biometric passports or work visas and did not apply for PESEL UKR are those who temporarily replace, within the rotation system, those women who are working more long-term.

### *The regulatory dimension*

The regulatory dimension of the migration infrastructure encompasses not only the rules governing entry, residence and employment access – such as the Special Law – but also their state enforcement mechanisms. The responsibility to enforce the Special Law was first placed by the government on the *voivods* (regional governors). However, one of our interviewees saw this application of the law as:

*...unprepared and largely unsupported. Also, the law did not ask for voivods to work very closely with local governments. Or NGOs. This was a major sore point, because there were actually conflicts later on.*

The fact that it did not provide competences nor impose obligations was also confirmed in other research (Magdziarz 2024). As an administration official noted, with time, labour offices created special lines with employees who speak Ukrainian and came up with ideas on how to reach employers who might want to employ Ukrainians.

Following the implementation of cash benefits, 2 types of benefit came to the fore in our research material. The '40 Plus' programme and the 'Good Start' or '300 Plus' one. The first referred to financial assistance for individuals as well as companies, in exchange for hosting forced migrants from Ukraine. Recipients of this financial assistance were granted 40 PLN (approximately 8.5 EUR) per day, per person hosted. According to our interviewees, some people who applied for this assistance did not receive it because their guests lost their PESEL UKR number during the hosting period (first 60 and, later, extended to 120 days). As one of our interviewees commented:

*These Poles are refused these benefits, which means they don't get any money and, in addition, the Code of Administrative Procedure does not apply to these proceedings, so there is nothing to appeal against. It cannot be appealed. So it's a spiral of problems.*

This was due to the fact that Article 13 (1a)<sup>13</sup> of the Special Law stipulated that administrative decisions were not issued in cases of this monetary benefit and the provisions of the Code of Administrative Procedure did not apply. The one-time cash allowance of 300 PLN (approximately 70 EUR), meant additional work for social welfare centres, requiring them to check whether the person applying actually had a PESEL number. One of our interviewees, an official from a social welfare centre in a large city, described the situation:

*Hundreds or thousands were flocking. It was an endless queue. We had to set up a system where there were seconded staff, downstairs, on duty to receive them, because one person couldn't handle it. (...) And*

*then when that wave passed but that wave since then... those people are still filing in but it's not so massive.*

The situation looked different in rural areas, which had fewer forced migrants to assist. One of our interviewees, a Ukrainian woman who ended up with her 2 children in a community where she was the only Ukrainian, claimed that the local community and municipal administration were very supportive from the beginning in providing her with school benefits as well as employment. She said: 'They helped a lot, because, well, when I didn't understand anything at all, what it was about, well, they sorted everything out for us, some sort of a job for me there at the beginning as well...'. Even with this support, she initially worked in agriculture without a contract and claimed that she was paid less than Poles for the same work. Only with time did she manage to change to an official job in a different sector. Paradoxically, when it comes to access to the labour market, Svitlana, with 2 children – and only thanks to having first found a highly flexible, informal cleaning job – was able to use the opportunities offered by the municipalities, in terms of language courses and new job skills:

*[Name of city] introduced a project. I don't remember what it's called properly but what you get there is that you're trained and taught for 3 weeks for 8 hours. (...) And then they give you an internship for 3 month. You pass this internship and then the employer looks at it and keeps you or does not keep you. So, I signed up with the girls here too. This is also organised by the local labour office – 40 places for people there with the status of the UKR.*

Another challenge in implementing the Special Law was how to advise the forced migrants in light of an unclear and repeatedly amended legal act. For example, according to the Special Law, a person is not required to have the PESEL UKR to have protection (although he or she will not receive benefits). However, the parliamentary explanatory memorandum to this provision explicitly states that the legality of this person's stay depends on obtaining a PESEL UKR within 30 days.<sup>14</sup> This 30-day deadline was, moreover, subsequently modified on several occasions (AIDA 2023a, b). As our interviewee from the central administration commented:

*And then I do see some news that you have, in 30 days, to compulsorily [apply for the PESEL number], otherwise you will be illegal. And I think not... that if you don't do it in 30 days, because that, yes... it follows from the explanatory memorandum but it follows from the Special Law that getting temporary protection is not dependent on a PESEL.*

Migrants were also concerned with the temporariness of their legal stay, including that of their children. Initially, the Special Law stated that temporary residence was to be granted after 9 months of stay in Poland (Art. 38). However, later on, the government backed out of this with the Act of 13 January 2023.<sup>15</sup> This again changed, starting from 1 April 2023, with the restriction that only those Ukrainian nationals who are employed or self-employed can apply; however, this amendment did not include the children of these persons.<sup>16</sup> As a representative of the central administration commented: 'Well, this is the kind of question we get every week and the answer is: "Please wait for the government's new solutions"'. Paradoxically, Ukrainian migrant workers were automatically treated as forced migrants by the administration. As our interlocutor complained:

*All the provincial offices unlawfully do refuse to initiate county proceedings, including those Ukrainians who did not want to benefit from temporary protection at all. They came here because some company invited them, because the employers have nothing to do with the war. The war makes no difference to them at all. They simply came to Poland to work, for example, and they are automatically taken under temporary protection and cannot apply for credit either.*

The accounts quoted above reflect, necessarily, only part of the problems arising from the hurried introduction of such complex regulations. It is worth noting that they concerned essentially all the major solutions adopted in the Special Law.

On 7 June 2024, the Polish President signed a further amendment to the Special Law. It extended until 30 September 2025 the legality of residence of Ukrainian citizens who arrived in Poland in connection with the full-scale war in Ukraine, as well as those whose residence documents (e.g. visas, temporary residence permits) expired after 24 February 2022. Similarly, access to health, family and social benefits and the possibility to stay in collective accommodation facilities, has been extended. It also implies the cessation (starting from 1 July 2024) of cash benefits for providing accommodation and meals to a Ukrainian citizen; private individuals who did so at their own expense will no longer receive support. The parental benefit (the so-called '500 plus') and 'Good Start' benefit will only be available to children studying in schools which are part of the Polish educational system. The parental benefit will also be available to children attending Polish kindergartens and/or who are not yet in compulsory education.

One of our interviewees commented that the temporariness of the Special Law is justified in the light of Ukraine's future:

*My opinion is that a large part [of the forced migrants] should go back to Ukraine for the reason that Ukraine, without them, cannot, will not be able to rebuild itself and maintain its statehood. So I think that this temporariness should be maintained for a while yet.*

However, a new pathway for further residence legalisation for Ukrainian citizens under temporary protection has been created. It will provide an opportunity to obtain a residence card (valid for 3 years)<sup>17</sup> for those who had an active PESEL UKR on 4 March 2024, as well as on the date of the application for a residence card – and had this status uninterrupted for at least 365 days.<sup>18</sup> The legislator intends this to ensure that people who have built up a 'real bond' with Poland, through the use of temporary protection, benefit from this solution. If, in the near future, the temporary protection under the Special Law ends, persons covered by it (and who meet the 'ties to Poland' criteria) will have a simplified opportunity to obtain a residence card. This legislation can also be seen as an attempt to incorporate some of those under temporary protection into the general immigration system.

#### *The commercial and humanitarian dimensions*

The commercial dimension comprises fee-based agencies and other labour recruiters or intermediaries responsible for facilitating, organising and expediting international mobility, while the humanitarian dimension primarily consists of non-governmental, non-profit organisations (Xiang and Lindquist 2014). Undoubtedly, the Special Law facilitated the work of migration-infrastructure actors in the humanitarian dimension. For the first time, they had to deal only to a limited extent with issues related to the legalisation of entry and residence. This enabled them to devote more time to finding work for migrants. As one of our interviewees, a representative of civil society, commented:

*It is the Special Law that allows you to open a one-person business, that allows you to access the labour market normally – and it is also a great convenience for employers, because it was previously incumbent on them to make a work permit. Now they can actually normally hire a person from Ukraine, the same as Poles. So that's a huge, huge plus.*

The importance of the assistance of civil society and, in particular, of migrant organisations, was also visible in the interviews with migrants. For example, one woman, who arrived after the outbreak of the war with her children and parents and who worked in the domestic work sector, commented:

*Then we have a very good group now, a migrant centre in [name of town], run by D. [name of person]. There is also a lot of information. And before that there was or there is also their site 'Girls in [name of town], in Wielkopolskie'; they are very solidary. So I used such information, such resources.*

However, despite the fact that the government did quite quickly reduce administrative procedures to a minimum, mainly by digitalising the process of accessing and navigating the labour market (see also Matuszczyk and Kowalska 2024), civil society had first to learn 'the new rules'. As one of our interviewees, a representative of a migrant organisation which, until recently, dealt mainly with the integration of labour migrants, said:

*The Special Law has increased our workload. Analysing this law and providing information on it takes time. We also had to receive training on the law and we asked, for example, the [name of NGO] to provide us with such training, as the law was very general in places. In addition, there were 9 or 10 amendments. Even now, after almost a year and a half, we do not have a clear and transparent situation with the UKR PESEL. So there are a lot of questions and so far it has not been settled.*

The organisation that provided them with training on the Special Law cited by this interviewee has a long-standing history of providing legal assistance to migrants, including forced migrants. Here, cooperation with civil society was essential, with a dynamic learning process by those organisations that have reoriented themselves to assist Ukrainian nationals seeking refuge. This was also confirmed in a number of other studies (Jarosz and Klaus 2023; Matuszczyk and Kowalska 2024). This interviewee also points to 2 other important aspects: the lack of clarity of the law and the continued amendments. One migrant organisation representative articulated the core need: a concrete, predictable timeframe. As they poignantly expressed it, what migrants truly seek is a commitment that 'until the war in Ukraine is over, there will be a Special Law... so that Poland will be stable, so that you can focus on finding work, on some long-term planning'.

Another important feature that comes to the fore in the interviews, adding to the chaos around the interpretation of the situation of migrants, is the fact that different legal orders collapse into each other. That was because Russia's full-scale aggression against Ukraine coincided with the final phase of the coronavirus pandemic. During the pandemic, a special legislation<sup>19</sup> was adopted, also regulating the extension of the stay of Ukrainian citizens in Poland. A general rule has been adopted, according to which documents entitling foreigners to stay in Poland are valid for 30 days from the date of cancellation of the epidemic emergency by the authorities.<sup>20</sup> Many Ukrainian citizens in Poland held visas that were issued under other legal regulations. Thus, there were multiple legal statuses, depending on the date of the person's arrival in Poland. This caused understandable confusion among the migrants and required

a significant effort on the part of civil society and also commercial actors who provided legal assistance, to discern this legal state of affairs.

Numerous employment agencies engaged in activities, including legal aid, to assist the forced migrants in a better adaptation in the labour market (see also Matuszczyk and Kowalska 2024). Our interviewees representing employment agencies observed the legal uncertainty of not only the migrants but also the employers. As the representative of an intermediary company shared:

*Most cases of illegal employment of foreigners in Poland today are not due to the bad will of the employer or the employee but because some formalities, deadlines, documents, guidelines and so on have not been observed, because someone has not caught on or is not keeping track of it. So, in terms of legalisation, a lot has changed and you have to have your hand on the pulse all the time and look at different regulations, not only at the level of laws but also at the level of regulations.*

Certainly, the most important in this context was Article 22 of the Special Law, which required the employer to notify – within 14 days – the employment of a protected person (this deadline has been reduced to 7 days, starting from 1 July 2024<sup>21</sup>). However, the last sentence of the quoted statement indicates that those carrying out activities such as job placement have also had to contend with the complexity and volatility of regulations at the sub-statutory level.

Migration-infrastructure actors had to be careful not to contribute to the legal chaos by providing outdated information or refusing to give access to services. A civil society representative, herself a Ukrainian citizen, described these multiple legal orders during the interview as confusing not only for them but also for border guards:

*The visa that was extended under the COVID Act gives me the right to cross the Polish–Ukrainian border and the one that was extended under the Special Law does not. (...) That was the biggest problem at the time.*

According to our interviewees, the EU's TPD made up for certain shortcomings of the Special Law. The opportunity to reach for the TPD was provided by the fact that the Special Law required that the crossing of the border by a migrant when entering Poland after the outbreak of the full-scale war had to be recorded by the Border Guard (the TPD did not formulate formal requirements on how a person fleeing war should cross the border). As one of our respondents, a coordinator at a large organisation assisting migrants, including job search, told us:

*In our practice, the Directive has helped, for example, those persons who have crossed the border illegally... because the Directive gives the possibility to legalise such a person. Actually, we have two forms of temporary protection [the Special Law and the Temporary Protection Directive].*

Another case was where EU standards guaranteed certain benefits and Polish legislation conflicted with them. This was the issue, from a certain point, with the guarantee of a place of residence for people seeking refuge. As mentioned by our interviewee from civil society:

*There was also more talk about the Directive when the subject of payment for stays in collective accommodation came up. As the Directive imposes such an obligation, it obliges EU countries to ensure access to the labour market, medical services and housing too.*

One of the Special Law's amendments (dated 13 January 2023) made it compulsory for Ukrainian nationals to pay for stays in these places. In justifying this change, the legislator argued that it was needed to 'activate Ukrainian citizens residing in collective accommodation centres' (Sejm RP 2023: 9). However, the need for this activation has not been substantiated by data on the economic activity of the inhabitants of these centres.

An interesting case of how infrastructure actors from the social dimension impact on changes in the Special Law is the draft amendment to the law, which included the introduction of the institution of intercultural assistants into the Education Law.<sup>22</sup> The task of intercultural assistants is to assist non-Polish nationals subject to compulsory schooling or compulsory education – who do not speak the Polish language or who speak it at a level insufficient to benefit from education – in their contacts with the school environment.<sup>23</sup> Their role is also to interact with their parents and the school. At the consultation stage of the law, a coalition of NGOs pointed out that the distinction between this function and that of a teacher's assistance was not clear enough. Experts predicted that the adoption of such a regulation would result in disorientation for school managers due to the confusion between their roles and tasks (FRS 2024). Despite the objections raised, the provision was enacted in its original form.

Overall, it was clear from our study that, in contrast to migrants in domestic work, migrants in agriculture – those who arrived both before and after the war – lacked or had very limited access to civil society organisations which could navigate them in the new legal reality. On the other hand, initially, for many Ukrainians, staying in the countryside was a 'good' strategy, mainly in the context of housing conditions – orchard owners simply had the facilities to host larger families. However, this was especially challenging, as not only did children not have access to schools but they also worked in the fields together with their parents.

### *The technological dimension*

The technological dimension includes communication channels (such as social media) and transportation systems that enable physical border crossings (Xiang and Lindquist 2014). The Special Law has introduced the register of Ukrainian citizens who have been assigned a PESEL number in the ICT system (Article 6); known as Diia.pl, it has provided the legal basis for the creation of a trusted profile for Ukrainian citizens applying for a PESEL number (Article 9) and for the activation of the *mObywatel* application for Ukrainian citizens (Article 10), as well as an ICT system facilitating contact between Ukrainian citizens and employers (Article 22a). Although the central administration has translated many of the websites into Ukrainian and Russian and created sites for forced migrants to find jobs (see also Matuszczyk and Kowalska 2024), there are, according to our interviewees, challenges when it comes to the technological dimension of the migration infrastructure. For example, the system of applying online for a residence card is not well set up, which means that Ukrainian nationals will have to turn up in person at the offices. As one of our interlocutors from the central administration commented:

*If the voivodeship office, by 1 April, does not get good access to the PESEL system, where these fingerprints are, we will not be able to take and confirm this data from this system and pull it into the residence system, so it will have to summon this Ukrainian. And so he or she has to come in, be at the window, wait, put up with his or her time and sacrifice the work of the office staff so that he or she can provide the fingerprints.*

Notably, official government websites were absent from our migrant interviewees' information sources, while community-created platforms established by Ukrainian representatives, which are an intersection of the social and technological dimensions, emerged as critical communication channels. Our interlocutors looked to dedicated Facebook and Telegram groups for information. For example, Ulana is a 34-year-old from southern Ukraine who arrived with 2 children to Poland to join her husband – a labour migrant. She relied on both the internet and civil society to find out about the Special Law. As she said: 'Well, we have a migrant centre, there are girls there who can help you, there are bloggers here in Poland too, they explain quite well'. The combination of social media and Ukrainian local community initiatives also comes to the fore in another interview:

*We have a very good group, it's 'ours in [name of town]', it's like a platform where Ukrainians who left Ukraine and settled in Poland and that's where everything is going on. You know, it's like in their own environment, I mean, someone got something and immediately posted 'I got something there'.*

### *The social dimension*

The social dimension of the migration infrastructure is mainly the social networks of migrants. In this article, we understand social networks to be dynamic social constructions, involving complex processes of communication, which (re)produce and change social relationships (Fuhse 2015). The interviewed migrants' social networks, especially of those who already had a temporary or long-term status of stay, were initially lacking relevant information concerning the Special Law. However, information about this act and its amendments dynamically turned into a network resource thanks to social media. As past research also shows (Homel 2020), Ukrainian-based networks of support and grassroots organisations, many of which are organised by women using social media, have quickly adapted to the emerging needs.

Ulana reflects on the pluses of how quickly the relevant information spreads via social ties: 'Word of mouth works faster. One person went to the municipality office, another person heard something and you already started to do something'. The network accumulates not only information but also trusted opinions about its relevance, from different sources. Such is the case of Svitlana, who arrived for the first time in Poland with the outbreak of the full-scale war but whose husband already worked as a truck driver in Poland. Svitlana learned about the rights linked to the Special Law through the wife of an acquaintance of her husband, a labour migrant with 18 years of migration experience. She helped Svitlana to arrange the documents:

*Well his wife, [name], the acquaintance's wife, picked us up and, it turns out, took us to the PESEL, made travel passes, explained... She explained what to do, she helped us to register 500 Plus, in short, she did it all.*

The Special Law has created different categories of migrants, creating some tensions within the Ukrainian diaspora. As one of the interviewed migration-infrastructure actors, who has set-up an intermediary work agency and who is a migrant from Ukraine herself, said:

*I see more downsides than upsides there. (...) Because they gave too much. They gave too much. (...) I used to say that the refugees came first, those who came after 2022. In second place are the Poles and in third place are the ones like us who came earlier. (...) if you had come before the 23rd [of February], you are not human and, after the 24<sup>th</sup>, you have everything here.*

This meant that some labour migrants drew social network boundaries, making some resources less or not accessible to migrants who arrived after the outbreak of the war.

According to our interlocutors, institutional spaces – where newcomers could interact with other people, including more-experienced Ukrainians – were also important when it came to finding out about access to rights. In the case of one of the migrant interviewees, it was a church:

*[I]n our church, there's a gentleman like that (...) He's so involved, he helps a lot, too... Peter helped our Ukrainians with their documents and PESEL; whatever they did, he helped a lot. So he was very involved in that.*

For Irina, who arrived in Poland in April 2022 with two children from an eastern region in Ukraine and had no previous ties to Poland or migration experiences, it was at the hostel for refugees where she stayed. A Ukrainian woman who worked at the hostel not only shared with her the information on how to legalise her stay but also took her to a place where she received her registration number – PESEL UKR – opened her bank account and received social insurance; she also shared with her information about housing possibilities. As she quickly received the information about the Special Law, her children were already enrolled in a Polish school by May 2022.

When it comes to access to housing benefits regulated by the Special Law, the 'settled' migrants also had an opportunity to participate when hosting their families or friends. As one of the interviewees, whose children had already been based in Poland for some time, commented: 'The children even received compensation for housing because they had 4 people living with them, all these; the 40 Plus programme, I think it was called'. However, social networks also served to warn against abuse. Acquaintances warned those who had received the PESEL UKR not to give their PESEL to homeowners, who were eager to participate in the 40 Plus programme, despite providing poor living conditions. Zenia, a 37-year-old, who joined her mother, a labour migrant, in Poland, said: 'And the girls warned me immediately not to give our PESELS to anyone'.

Those interviewees who had a PESEL UKR also faced challenges due to their returning to Ukraine even for a few days, due to a lack of communication between the different state actors:

*We are fighting in ZUS [Social Insurance Institution] repeatedly. But so far we still have our [PESEL] UKR status... but for some reason, something went wrong somewhere. I can't figure it out. (...) It's from January, we were 5 days away and they stopped paying us. (...) So it's a real problem. I am not the only one but just talking to the girls who live and work here... (...).*

This points to a dysfunction of the migration infrastructure, a rupture in the provision of assistance and missing interlinks between the different dimensions and within the dimensions – here regulatory.

## Conclusions

How 'special' is the Special Law? The main aim of this legislation was to temporarily equalise the legal status of all Ukrainian nationals arriving in Poland after the outbreak of the war with that of Polish citizens, thereby avoiding the need for individual applications, as required through the international protection pathway. This law simultaneously became an instrument for Poland to create its policy, which operated parallel to the Temporary Protection Directive and was to some extent distinct from it. The intent of the Polish legislator was signalled at the very beginning by limiting the scope of the

protection granted to Ukrainian citizens (and their family members), as well as by introducing preferential conditions of employment for representatives of certain professions who were among the forced migrants from Ukraine. Creating one's 'own' law also gave the Polish legislator flexibility for later modification of the scope of assistance provided to migrants, including the introduction of provisions limiting it. From this point of view, this approach was exceptional both within the Polish legal order as well as the broader EU system for granting temporary protection.

While this legislation created unprecedented legal protection for forced migrants, its enforcement revealed significant challenges. The law lacked clear enforcement mechanisms and dedicated funding, creating uncertainty for implementing organisations. Humanitarian, commercial and social actors had to rapidly familiarise themselves with the law while adapting to its frequently changing rules and timelines. The complexity of the application of the law is evident in the law's frequent modifications – by November 2024, it had undergone 29 amendments. Organisations with existing connections to migration infrastructure and past refugee-assistance experience were best positioned to navigate these changes. They used established networks to quickly understand and implement the new requirements. Next, migrant organisations and social-media platforms emerged as the most effective channels for communicating essential information to forced migrants.

Although the Special Law (as part of the regulatory dimension of the migration infrastructure) was a great convenience for people who wanted to find temporary refuge in Poland, it did not facilitate mobility as the definition implies. From a formal point of view there was no ban on leaving Poland but the mobility of Ukrainian nationals under its protection was limited by the 30-day absence rule. Thus, it did not contribute in that sense to the migration capabilities of forced migrant women from Ukraine – an example of involution, as Xiang and Lindquist (2014, 2018) would have phrased it.

One critical challenge facing Ukrainian migrants is the pervasive lack of prospects – neither in Poland, where temporary protection offers no long-term stability, nor in Ukraine, where basic security remains absent. Interestingly, our interviews revealed that migrants did not strongly emphasise the temporary nature of their status, which can be attributed to 2 key factors. First, at the time of our research, migrants were primarily focused on their immediate adaptation and survival, rendering long-term considerations secondary. Second, when comparing Ukrainian forced migrants' experiences to past Ukrainian labour migrants' ones, it is clear that the latter have historically navigated highly uncertain legal environments, making this state of legal uncertainty almost a norm.

The Special Law's impact on migration patterns reveals complex dynamics. Far from halting temporary labour migration, it has instead integrated forced migrants into the same labour-market sectors, often subjecting them to similarly precarious working conditions as labour migrants. This is particularly challenging for migrants with children and care responsibilities, who face limited workplace flexibility. While temporary protection offers critical rights previously unavailable under labour-migration schemes, it paradoxically fails to accommodate the inherent mobility of this population. Forced migrants continue to maintain transnational connections, mirroring established labour-migration patterns. They frequently cross borders to check on family members – husbands, elderly parents or adult children – who remain in Ukraine, underscoring the persistent need for familial and social connectivity despite displacement.

This analysis concludes by highlighting critical avenues for future research. Will the extensive support for newly arrived forced migrants continue? Do non-governmental organisations and other actors today still offer basic support to Ukrainian migrants as they did in 2022 or have they gone further and are now dealing with integration? Similarly, as Olga Wanicka (2024) has done so among Filipino migrants, it would be important to find out more about the role of micro-influencers, such as bloggers or vloggers, in communicating information about the rights of forced migrants' from Ukraine. Taking into

account our findings, too, we need to learn more about how the Special Law's enforcement differs in smaller towns, where cross-sectoral cooperation and social networks operate distinctly from urban centres. When it comes to the commercial dimension, how sustainable were the interventions of employment intermediaries traditionally disconnected from forced-migrant protection? Last, but not least, what role do social networks play in cross-sectoral knowledge exchange regarding the regulatory framework?

The Polish government is currently working on a comprehensive migration policy reform to take effect after September 2025. The proposed changes include greater control over migrant employment and introducing stricter regulations that will require employers to hire foreign workers through formal employment contracts. Still, when it comes to forced migration, the Special Law's temporary nature exposed a fundamental limitation: assistance remained heavily skewed towards immediate reception rather than long-term integration. Moreover, the 'special' designation of the law raises a profound theoretical and practical question: Is this state of exception – characterised by provisional rights – potentially becoming a new normative framework for migrant protection?

## Notes

1. *Journal of Laws* 2022, item 583; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20220000583/U/D20220583Lj.pdf>.
2. The Act of 13 June 2003 on granting protection to aliens within the territory of the Republic of Poland, *Journal of Laws* 2003 No. 128, item 1176 as amended; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20031281176/U/D20031176Lj.pdf>; <https://www.asylumlawdatabase.eu/en/content/en-law-13-june-2003-granting-protection-foreigners-within-territory-republic-poland>.
3. *Official Journal* L 212, 07/08/2001 P. 0012 – 0023. <https://eur-lex.europa.eu/eli/dir/2001/55/oj/eng>.
4. However, this did not exclude the possibility for persons without Ukrainian citizenship to benefit from temporary protection under the Act on granting protection to foreigners within the territory of the Republic of Poland.
5. *Journal of Laws* 2021, item 2354; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20130001650/U/D20131650Lj.pdf>.
6. *Journal of Laws* 2013, item 1650 as amended; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=wdu20130001650>.
7. *Journal of Laws* 2003 No. 128, item 1176 as amended; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20031281176/U/D20031176Lj.pdf>.
8. On the position of the Special Law in the context of the aforementioned laws: Drembkowski (2022); Józwiak and Tygielski (unpublished); Klaus *et al.* (2022); Szczepański (2023); Szmid and Sawicki (2022).
9. According to data from the Polish Office for Foreigners, on 31 January 2024, 947,031 people had an active UKR PESEL. As of 24 February 2022, it had been assigned nearly 1.8 million times (*Office for Foreigners Report...*). This indicates the scale of leaving Poland by Ukrainian citizens after they have already been assigned a PESEL number.
10. *Journal of Laws* 2022, item 830; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20220000830>.
11. *Journal of Laws* 2023, item 185; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20230000185>.
12. *Journal of Laws* 2022, item 583 as amended; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20220000583/U/D20220583Lj.pdf>.

13. Introduced on 27 April 2022 *Journal of Laws* 2022, item 930; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20220000930>), subsequently repealed on 15 May 2024 *Journal of Laws* 2024, item 854; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20240000854>).
14. Government draft law on assistance to citizens of Ukraine in connection with the armed conflict on the territory of that country, print 2069; (<https://www.sejm.gov.pl/sejm9.nsf/druk.xsp?nr=2069>).
15. *Journal of Laws* 2023, item 185; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20230000185>.
16. *Journal of Laws* 2023, item 185; <https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU20230000185>.
17. Art. 42p of the Special Law; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20220000583/U/D20220583Lj.pdf>.
18. Art. 42c of the Special Law; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20220000583/U/D20220583Lj.pdf>.
19. Act of 2 March 2020 on special arrangements relating to the prevention and control of COVID-19, other infectious diseases and emergencies caused by them, *Journal of Laws* 2020, item 374 as amended; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20200000374/U/D20200374Lj.pdf>.
20. The state of epidemic emergency was revoked in Poland as of 1 July 2023 – Regulation of the Minister of Health of 14 June 2023 on the revocation of the state of epidemic emergency in the territory of the Republic of Poland (*Journal of Laws* 2023, item 1118; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20230001118/O/D20231118.pdf>).
21. Art. 1(14) of the Act of 15 May 2024 amending the Law on assistance to citizens of Ukraine in connection with the armed conflict on the territory of the country and certain other laws, *Journal of Laws* 2024, item 854; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20240000854/O/D20240854.pdf>.
22. Art. 165(8a) of the Act of 14 December 2016 – Education Law, *Journal of Laws* 2017, item 59; <https://isap.sejm.gov.pl/isap.nsf/download.xsp/WDU20170000059/U/D20170059Lj.pdf>.
23. <https://asywszkole.pl/asystemtura-miedzykulturowa/>.


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