

Economic Empowerment of Forcibly Displaced Persons from Ukraine

ASSESSMENT OF THE POLISH LEGAL AND
REGULATORY FRAMEWORK AND THE ROLE OF
THE POLISH PRIVATE SECTOR



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FOREWORD

This report was completed in October 2022 to support the Polish authorities and representatives of the Polish private sector to integrate FDPs from Ukraine after Russia invaded Ukraine on February 24th, 2022. At the time of publication (June 2023), the Polish authorities have already implemented substantial measures to ensure the safety of FDPs from Ukraine, including measures aimed at facilitating their social and economic inclusion in Poland.

One of the main recommendations of this report was to amend the Act on Assistance to Ukrainian Citizens. The Polish authorities have swiftly implemented this recommendation, and a new Act entered into force on January 28th, 2023. The main changes in the Act are reported as follows:

- 1. Establishing a 30-day deadline for applying for a PESEL number** from the date of arrival on the territory of Poland.
- 2. Temporary residence application** is possible after nine months from entry to perform work. The temporary residence permit is related to primary forms of economic activity: (i) temporary residence and work permit; (ii) temporary residence permit to perform work in a profession requiring high qualifications; and (iii) temporary residence permit to conduct business activity.
- 3. Extension of residence rights for Ukrainian citizens who stayed in Poland before February 24, 2022.** In the previous legal status, Art. 42 of the Act contained discrepancies regarding the period for which certain entitlements are extended (periods of stay, periods of the obligation to leave the territory of Poland, validity of documents). The Amendment introduces the unification of deadlines, with extended authorizations ending on August 24, 2023. This will allow for the continuity of the rights of Ukrainian citizens under the provisions subject to change.
- 4. Using temporary protection in the territory of another European Union Member State.** The Amendment introduced the exclusion of Ukrainian citizens who enjoy temporary shelter on the part of a Member State of the European Union other than Poland from the residence permit referred to in Art. 2 sec. 1 of the Act (new Art. 2(3)). As a result of using temporary protection in a Member State of the European Union other than Poland, citizens of Ukraine will also lose the residence right referred to in Art. 2 sec. 1 of the Act (new Art. 11(4)).

In light of these changes, the authors commend the ongoing efforts made by the Government of Poland in facilitating work and economic opportunities for FDPs from Ukraine and hope that the findings and recommendations contained in this report will yield further enhancement of the de facto administrative procedures required by Ukrainian nationals in Poland and facilitation for the Polish private sector to employ, train, and do business with FDPs from Ukraine living in Poland leading to a smooth and mutually beneficial process for their social and economic inclusion.

METHODOLOGICAL NOTES

I. METHODOLOGY

This diagnostic is based on a standardized methodology developed by the World Bank “Private Sector for Refugees” (PS4R) Platform. The process examines the refugee-related legislation, frameworks, and conditions relating to refugees’ engagement with the private sector in countries affected by forced displacement. The PS4R diagnostic assessment includes an analysis of sectoral challenges associated with the development and implementation of the related laws and frameworks, including refugees’ access to (i) economic opportunities and entrepreneurship; (ii) credit and banking; (iii) property and land; (iv) education; (v) health and social services; (vi) information; (vii) legal documents (including business registration, passports, and travel documents); and (iii) training and capacity building.

The diagnostic also provides information on the readiness of the private sector to engage with refugees or forcibly displaced populations (FDPs), including constraints or incentives companies must hire or do business with FDPs.

A PS4R diagnostic can provide governments, the private sector, development partners, and civil society actors with actionable analysis to improve legislative frameworks and facilitate refugee-private sector linkages. The diagnostic is also expected to highlight existing benefits, procedures, and regulations relating to the presence of forcibly displaced populations and provide data analysis and suggest appropriate action plans to national and local institutions, affected populations, NGOs, and the private sector relating to their role in implementing displacement-related practices.

The methodology applied in this report consists of a mix of interviews, meetings, and desk research. It includes a review of current Polish legislation and regulations, an analysis of the Polish private sector considering the arrival of FDPs from Ukraine, and meetings with relevant counterparts. Interviewed counterparts include, among others, the Ministry of Justice; the Voivodeship of Mazovian Region; the Polish Banks’ Association; the Fundacja Ocalenie NGO; the Polska Akcja Humanitarna NGO; and Threezone – a private outsourcing company specializing in employing Ukrainian citizens in Poland.

The scope of interviews and desk research was set to provide a detailed account of regulations and their practical applications that can create economic opportunities for and enhance the self-reliance of forcibly displaced persons (FDPs) from Ukraine in Poland. Since self-reliance is essential for refugees to become a force for growth and to accelerate social integration into society, the first part of this diagnostic analyzes the existing legal framework governing FDPs from Ukraine to become self-reliant in Poland and integrate socially and economically in the host environment.

The second part of this diagnostic focuses on Polish Micro, Small, and Medium Enterprises (MSMEs) and their willingness and capacity to support FDPs from Ukraine by employing them, supporting their entrepreneurship, investing in them, or developing targeted products and services. This part also covers an overview of the entrepreneurship support and available economic opportunities for Ukrainian FDPs. To that end, desk research and a small set of seven interviews with employers from the private sector in Poland were conducted.

Respondents were chosen based on having experience in hiring Ukrainian FDPs. Interviewed companies include three large companies from the hospitality, retail, and outsourcing sectors, one medium-sized manufacturing company, and three small firms (IT company, restaurant, and manufacturing company). This diagnostic finally provides recommendations for the Polish authorities to strengthen Ukrainian FDPs’ self-

reliance in entrepreneurship, investment, employment, and products & services.

These recommendations are structured around the guidelines elaborated in the Charter of Good Practices on the Role of the Private Sector in Economic Integration of Refugees prepared by the World Bank and its partners in 2019.¹

II. CAVEATS AND DEFINITIONS

Some caveats concerning using the term “FDPs from Ukraine” throughout this report should be noted.

The assessment has shown the existence of three categories of people that relate to the conflict in Ukraine and the subsequent arrival of FDPs in Poland:

- **Ukrainian citizens who arrived in Poland after February 24, 2022.** The rights and social protection granted to the Ukrainian citizens who came after February 24, 2022, and who have been subject to substantial support from the Polish authorities and citizens, go beyond the refugee status defined by the Geneva Convention Relating to the Status of Refugees (1951). These new arrivals have been completely assimilated into the Polish system and enjoy almost mirrored rights to Polish citizens, including eligibility for many social benefits, the same access to the labor market, education, health system, etc. Ukrainian citizens and their spouses and children who arrived in Poland after February 24, 2022, have not yet applied for the temporary protection status and benefit from special assistance and a unique legal framework created, described in detail below.
- **Third-country nationals who arrived in Poland after February 24, 2022.** Third-country citizens who escaped from Ukraine can reside in Poland based on the 15-day consent of the Commander of the Border Guard Post if they cross the border after February 24. However, they cannot take steps to legalize their stay in Poland.²
- **Ukrainian citizens who arrived before February 24, 2022.** Ukrainian citizens who came before February 24, 2022, fall under the general rules of applying for residence and work permits by foreigners in Poland. These Ukrainian citizens should have a legal stay certified by a residence card issued on the grounds of either a national visa issued at the Polish consulate in Ukraine for a maximum of one year, a Schengen visa, or a residence permit. However, the regulations provide for many exceptions to this rule. One is a simplified procedure of entrusting work to a foreigner that applies to citizens of Ukraine and five other countries. Such a foreigner may work without a work permit, merely based on the declaration of employment issued by his/her employer.³

To respond to a request from the Polish authorities, this report focuses on a review of the legal and regulatory conditions that affect the FDPs from Ukraine who arrived in Poland after February 24, 2022.

In particular, the report discusses special legislation issued to ease the life of the new wave of FDPs from Ukraine but also encompasses the existing regulations and their implementation in practice, information on existing engagements by each governmental body (e.g., ministries, voivodeships, municipalities, etc.), and organizations and companies which provide advisory services or support to FDPs from Ukraine, and non-governmental bodies.

The report also discusses challenges in the practical implementation of the existing laws and the readiness of the private sector to integrate refugees from Ukraine who arrived after February 24, 2022. The report also highlights practical barriers to accessing social services and economic opportunities by FDPs from Ukraine. Finally, the report makes recommendations and proposes an action plan which draws on PS4R principles.

This report builds on previous work and assessments of other forced displacement situations effectuated by the World Bank’s Private Sector for Refugees Platform (PS4R) project. Notably, while analyzing the readiness of the Polish private sector to integrate FDPs from Ukraine, this report refers to “FDP-related” MSMEs.

PS4R defines FDP-related MSMEs as those that participate in private sector support and create economic opportunities for FDPs through 5 criteria: (i) companies owned by FDPs; (ii) companies employing FDPs; (iii) companies providing services and goods for FDPs or linked to displacement flows within the host community; (iv) companies allowing the development of sectors that will ultimately result in enhanced downstream economic opportunities and integration of FDPs; (v) companies located in tight geographic areas due to displacement flow to alleviate these tensions.

In addition, the PS4R approach employs a gender lens regarding selecting FDP-related companies to highlight the role of refugee and displaced women in business (as owners and as employees).

III. STRUCTURE OF THIS REPORT

This report is structured in four parts:

Part 1 is an overview of the current situation related to the influx of Ukrainian FDPs in Poland and Europe in the aftermath of the conflict, which began on February 24, 2022.

Part 2 provides a detailed assessment of the Polish legal and regulatory framework for Ukrainian FDPs, including regulations for accessing social and economic services.

Part 3 provides an initial assessment of the market conditions for economic empowerment of Ukrainian FDPs and support from the Polish private sector and local organizations.

Part 4 highlights the role that the Polish authorities should play within a wider and more inclusive ecosystem that favors interactions between the Polish private sector and FDPs from Ukraine. This part then summarizes the recommendations that the Polish authorities could consider, should they wish to enhance the economic integration of FDPs from Ukraine along international standards by improving the implementation of existing laws and administrative procedures and developing new regulations.

Annex A then summarizes the recommendations and guidance provided considering the report’s findings into an action plan for public and private Polish actors.

PART 1 – INTRODUCTION

1.1 THE ARRIVAL OF FDPS FROM UKRAINE IN POLAND

The European Union and Poland have faced an unprecedented influx of FDPs. As of June 16, 2022, 5.137 million FDPs from Ukraine have been recorded across Europe. Over 7.7 million crossed the border from Ukraine, and more than 7.1 million are considered to be displaced within Ukraine. The first three months since Russia's aggression in Ukraine were the greatest refugee crisis in Poland after World War II and one of the largest in Europe.⁴

In response, Poland has swiftly undertaken measures to ensure that FDPs from Ukraine can legalize their stay. The country has opened its arms to 4 million Ukrainian FDPs that have crossed the border from Ukraine to Poland. As of July 14, 2022, over 1.2 million have registered with the Polish authorities, of which 94 percent are women and children. By granting an ID number (PESEL), the authorities have facilitated access to employment, education, health care, and other social welfare schemes. Financial institutions stepped in to provide access to bank accounts, e-banking services, and payment cards so that all the social benefits and cash payments could be safely received and used for the immediate needs of the FDPs. The conversion of Hryvnia (Ukrainian currency) into Zloty (Polish currency) was facilitated by an agreement between the central banks of Poland and Ukraine.

Over the first 3 months since the crisis in Ukraine, refugee reception centers in Poland have assisted more than 950,000 people. Pursuant to the Polish government's Commissioner for Military Refugees. Over 350,000 people used organized settlements in almost 6,000 refugee centers, and private Polish citizens have hosted an estimated 2 million. More than 1.2 million FDPs from Ukraine received a PESEL personal number. Over 580,000 are working-age people, and approximately 255,000 newly arrived Ukrainians have already been employed.⁵ Polish public institutions and, above all, citizens, and entrepreneurs have shown great empathy, solidarity, and selfless dedication to Ukraine's humanitarian crisis.

1.2 LONGER-TERM INCLUSION STRATEGIES

Undoubtedly, many Ukrainians will remain displaced for years to come due to the destruction of homes, social and economic infrastructure during the war. Economic integration becomes even more important, and the business community could play a critical role. Many Ukrainians have professional experience in sectors with local labor shortages and could be recruited into these harder-to-fill roles, such as hospitality, agriculture, and medical professions.

As international experience shows, host community fatigue will likely emerge, and long-term measures must be adopted. A strong regulatory framework supported by resilient institutions, fiscal incentives, and awareness and networking campaigns is crucial to remove barriers and enable the potential role of FDPs in creating economic opportunities for Poland.

Similar experiences were observed in other contexts. For instance, Venezuelans are fleeing a humanitarian crisis and violence in their homeland. Over the last decade, Venezuela has experienced a multifaceted humanitarian, economic, and social crisis that has led to a significant outflow of its citizens. By the end of October 2021, 5.91 million Venezuelans had left the country (about 16% of the country's population), with over 1.75 million migrating to neighboring Colombia.

Many neighboring countries were initially welcoming, but as the number of refugees has grown, some governments in those countries have imposed barriers to official entry by Venezuelans. Eventually, the capacity of governments in the region and local NGOs assisting the refugees became stretched, and donations from other governments and international organizations fell well short of the refugees' needs.⁶ Similar cases have occurred in locations neighboring protracted crises, such as Jordan, Turkey, Uganda, etc. Hence, Poland must anticipate such long-term effects and start elaborating on long-term solutions.

As many of the FDPs from Ukraine will stay longer, if not permanently, in Poland, the authorities need to make plans for their social, professional, and economic integration to facilitate their resilience and independence from welfare and social benefits. In the absence of those plans and their prompt implementation, public trust in government may erode as it may be perceived as ineffective in dealing with the refugee inflows and raise questions about the role of policymaking in addressing the public concern.⁷

The Government of Colombia has demonstrated admirable generosity and political will in welcoming refugees, and institutions there have proven to be capable partners worthy of support from international actors. It is important to point out that many Colombians and Peruvians are disadvantaged. Programs designed to support communities broadly where refugees live rather than focused solely on the refugees could ease the discrimination that many refugees are experiencing.

In July 2022, a new structure — the Department of Social Integration (DSI) — was established within the Prime Minister's Office to address FDPs' integration processes. The priority task assigned to DSI, supported by two large multidisciplinary advisory committees, was to design a new Strategy of Social Inclusion, creating linkages and coordination between different ministries, institutions, NGOs, and business environments. While FDPs from Ukraine are the critical target, the Strategy also encompasses other groups needing support with social inclusion, namely: people with disabilities and their families, young adults (24-35), children and youth, people with mental health problems, and repatriates.

The influx of FDPs from Ukraine has exacerbated pre-existing deficits of social inclusion mechanisms, and therefore the Strategy embraces all groups in need of assistance. The critical areas of strategic intervention are affordable housing, professional activation and social economy, inclusive education, mental health services, deinstitutionalization, community psychiatric care (children and adolescents, adults), and strengthening the potential of villages and small towns.

After a broad consultation process (October 2022 – February 2023), the Strategy will be presented and submitted for approval in May 2023. In parallel with this strategic work, a pilot Social Integration Program named 'We Need Each Other' has been designed by DSI and launched in February 2023. To strengthen the potential of small and medium municipalities (up to 120k inhabitants), the program takes an integrated approach in three areas: (i) creating affordable housing offers, (ii) coordinating local employment offers, and (iii) supporting the inclusion of children to the local education system.⁸ Based on this experience, a full-scale Social Integration Program is being prepared, tentatively planned for 2024-29.

1.3 PERSPECTIVES FOR ECONOMIC INCLUSION

The earlier FDPs from Ukraine are integrated into the Polish economy, the earlier they will integrate into Polish society more broadly and support the development of local communities. With the right regulatory incentives, local practices, and support from the private sector, FDPs from Ukraine can be employers, enrich the workforce, invest, and create new markets.

The Polish private sector will have a role to play in the economic integration of Ukrainian FDPs. Even before the war, the Polish private sector had already been heavily supported by employees from Ukraine. This became even more evident as the war in Ukraine began, and male Ukrainians returned to their country, leaving behind jobs in the construction, agriculture, and transportation sectors they had in Poland, resulting in labor shortages in some economic segments. After the conflict in Ukraine began in February 2022, multiple

Malta received the refugees but worked with other EU member states to relocate refugees within the EU based on numbers, skills, and needs, something that would also need to be coordinated across the EU in consideration of supporting the economic and social integration of FDPs in a sustainable manner.

European companies started to support FDPs fleeing Ukraine. The transport company FlixBus offered free tickets for Ukrainians at the Polish border. Marks & Spencer, Asos, and Lush took action to hire UK Ukrainians while answering labor shortages. These actions highlight the support that could come from local companies at the onset of the crisis, which would help accelerate FDPs' integration in labor markets.

The newly arrived FDPs, mostly women, have been very active in finding employment, especially in the services, hospitality, and administration sectors. They tend to be well-educated, use technology, and have a record of employment and entrepreneurship. However, the predominantly female FDPs

from Ukraine already face practical limitations in entering the labor market, such as insufficient childcare. Indeed, childcare is an important factor contributing to women's participation in the private sector for FDPs and local populations.⁹

Entrepreneurship may present a way to include FDPs in the labor market, especially through accelerators and incubators. In addition to being a gateway to income and employment, entrepreneurship fosters the inclusion of FDPs and local communities, primarily through actions of local authorities, to accelerate FDPs' insertion by recognizing their contribution as actors of local development. So far, there have been limited support programs in Poland to help FDPs become entrepreneurs. However, according to the Centre for Entrepreneurs,¹⁰ initiatives support for refugee entrepreneurs are growing globally, with over 32 new refugee entrepreneurship programs launched since 2012.

On average, participants of such programs gain the necessary skills, knowledge, and experience to start their businesses. These programs benefit FDPs, as they usually face challenges with language, access to finance, and understanding legal and tax systems in their new host country. For instance, accelerators, incubators, and platforms play an important role in building a startup ecosystem in a country. They create an environment for sharing experiences, networking, mentoring, and creativity.

Accelerators, which are growing in popularity in Poland, could help start a business by FDPs from Ukraine. The variety of programs offered is getting wider and more expansive each year. For instance, ReaktorX is a pre-accelerator program for first-time founders and helps new entrepreneurs find experienced mentors, validate their business ideas, and get funded. Regarding FDPs from Ukraine, Startup HUB Poland would be a good fit, as this non-profit organization supports Polish and international startups to set up their team and develop businesses in Poland.

Another example could be NextGrid in Warsaw, which offers a 3-month acceleration program for startups that use deep learning or reinforcement learning as their central components. In Rzeszow, a city close to the Ukrainian border, there is also a Rzeszow Startup Accelerator aiming at young, ambitious people with innovative ideas in the IT, automotive, fintech, and healthcare industries.¹¹

The Polish authorities could support the creation of employment and entrepreneurship opportunities for FDPs from Ukraine in several ways. Authorities could engage in a broad information campaign to match FDPs from Ukraine with incubator/accelerator programs enhanced by Polish language classes or basic interpreting services. In addition, the Polish authorities could expand or mirror the entrepreneurship program “Poland. Business Harbour”, which already exists for the Belarus IT specialist and offers a full range of services helping IT specialists, startups, and established companies to relocate to Poland.

Sweden’s welcoming refugee policy with residency limitation to 3 years as a condition to promote self-reliance and socio-economic independence is another systemic approach to integrating refugees. This conditional policy pushes refugees to work hard, learn the language and integrate while avoiding national criticism over refugees being a burden on the country.

The program provides information on how to start a business hassle-free, relocate employees and their families, and obtain business-related and legal aid from a “business concierge.” The program also connects incoming entrepreneurs with investors and grants for research and development. Moreover, Belarusian people and companies can receive support in liaising with local authorities and special economic zones in Poland, making office and residential space available to incoming guests. Furthermore, all children continuing their education in a Polish school will be entitled to additional hours of the Polish language.

PART 2 – DETAILED ASSESSMENT OF THE POLISH LEGAL AND REGULATORY FRAMEWORK RELATED TO UKRAINIAN FDPS

The best way to integrate FDPs from Ukraine into the Polish economy is to help their self-reliance by facilitating their access to work either as employees or as employers. However, although the regulations may be conducive to self-reliance, FDPs sometimes face de facto barriers that impede their access to essential services, hindering their ability to fully integrate. This part of the diagnostic will delve deeper into laws and regulations for FDPs from Ukraine, including access to basic services such as the ability to find employment, access financial services, create a business, etc.

2.1 PRE-EXISTING REFUGEE LAWS AND PRACTICES IN POLAND

Poland has been actively supporting FDPs in the past decades, being a signatory to the Geneva Convention Relating to the Status of Refugees (1951) and issuing rich legislation over the years. Table 1 lists the major acts governing the rights of foreigners seeking protection in Poland in general and a separate list of legislative acts issued for the Ukrainian FDPs of this year's war.

Table 1. General legislation related to FDPs in Poland

A	Convention relating to the status of refugees (Geneva, 1951)
B	Act of June 13, 2003, on social employment (Article 1 para.7 provides for refugees to implement an individual integration program within the meaning of the provisions on social assistance ¹²)
C	Act of 13 June 2003 on granting protection to foreigners within the territory of the Republic of Poland ¹³
D	Act of October 8, 2004, on the ratification of the European Agreement on the Transfer of Responsibility for Refugees, drawn up in Strasbourg on October 16, 1980 ¹⁴

Poland has also established a solid institutional framework supporting FDPs, including agencies, organizations, and companies that provide advisory services or support to FDPs, such as:

- Inter-Ministerial Committee for ensuring safety in the process of resettlement and relocation of foreigners;
- Center for Social Integration (Centrum Integracji społecznej, Ustawa o zatrudnieniu socjalnym);
- Office for Foreigners (Urząd do Spraw Cudzoziemców);
- Refuge Counsel (Rada do Spraw Uchodźców).¹⁵

2.2 GENERAL EU AND POLISH REGULATIONS FOR FDPS FROM UKRAINE

The war in Ukraine resulted in urgent new legislation to accommodate the needs of FDPS. In February 2022, following the arrival of FDPS from Ukraine, the EU granted all Ukrainian FDPS temporary protection for one year, renewable for up to three years. This entails getting a residence permit, access to the labor market and housing, medical assistance, access to education, and access to opening a basic bank account.

Poland has responded robustly to the unexpected influx of Ukrainian FDPS in the aftermath of the escalation of the conflict. Since the beginning of the crisis, the Polish authorities have aimed at a smooth integration of FDPS from Ukraine in its economy by preparing legal solutions to protect and provide shelter and assistance to those fleeing the war, with the goal that Ukrainian citizens who intend to stay in Poland for a long time can start integrating into all sectors of the Polish economy and social life.

Ukrainian FDPS who came to Poland as a result of the conflict in their country fall under special laws issued for their protection and are regulated by specific legislation as described in Table 2. It is important to clarify that the Act of 13 June 2003 on granting protection to foreigners within the territory of the Republic of Poland (see Table 1) does not apply to the temporary protection enjoyed by the citizens of Ukraine who arrived in Poland after February 24, 2022. In the same vein, the citizens of Ukraine are not subject to registration for foreigners seeking protection within the territory of the Republic of Poland but are subject to registration in the separate registry performed by Gminas (local municipalities).

Table 2. Legislation specific to FDPS from Ukraine

A	Temporary Protection Directive (2001/55/EC) triggered for the first time on March 4, 2022
B	Bilateral Agreement between the Republic of Poland and Ukraine on social security, made in Kyiv on May 18, 2012 ¹⁶
C	Bilateral Agreement between the Government of the Republic of Poland and the Cabinet of Ministers of Ukraine on the mutual academic recognition of documents on education and equivalence of degrees, made in Warsaw on April 11, 2005 ¹⁷
D	Act of March 12, 2022, on Assistance to Ukrainian Citizens in connection with an armed conflict in the territory of that state, as amended ¹⁸
E	Ordinance of the Minister of Education and Science of March 21, 2022, on the organization of education, upbringing, and care for children and youth who are citizens of Ukraine ¹⁹
F	Ordinance of the Council of Ministers of April 1, 2022, on the establishment of the Government Plenipotentiary for war refugees from Ukraine ²⁰
G	Ordinance of the Council of Ministers of May 4, 2022, on the maximum amount of the cash benefit due to the provision of accommodation and meals to Ukrainian citizens and the conditions for granting this benefit and extending its payment ²¹

H	Ordinance of the Minister of Education and Science of 13 May 2022 amending the regulation on the organization of education, upbringing, and care for children and young people who are citizens of Ukraine ²²
I	Announcement of the Minister of Digitization of 23 May 2022 on the determination of the date of implementation of technical solutions enabling the maintenance of the database referred to in Art. 13a paragraph. 1 of the law of March 12, 2022, on assistance to Ukrainian Citizens in connection with an armed conflict in the territory of that state ²³

In addition to the existing institutional framework supporting FDPs in general, Poland has also created two institutions devoted specifically to the new wave of the Ukrainian FDPs: The Government Plenipotentiary for war refugees from Ukraine;²⁴ and the Minister for Social Inclusion of Ukrainian Refugees. On March 11, 2022, an Act on Assistance to Ukrainian Citizens was issued, establishing the legal framework determining the scope of help for the Ukrainian FDPs, including:

- Special rules of employment.
- Assistance provided by regional and municipal administration.
- The establishment of the Assistance Fund (Fundusz Pomocy) for financing the assistance to the Ukrainian FDPs.
- Selected privileges granted to the Ukrainian FDPs.
- Special rules for extending the legal residence of Ukrainian FDPs, and documents issued to them in relation to the entry into and residence on the territory of Poland.
- Selected privileges for Polish and Ukrainian citizens who have been university-level students, teaching, and research faculty in Ukraine and entered Poland due to the conflict.
- Special rules for education, mentoring, and childcare for Ukrainian children and students.
- Special rules for the organization and operations of university-level institutions in order to provide access to Ukrainian students.
- Special rules for creating and operating enterprises by Ukrainian FDPs.

Pursuant to the Act on Assistance to Ukrainian Refugees, the PESEL number issued to all Ukrainian citizens and their families opens access to the following services and monetary benefits on the same basis as Polish citizens enjoy, as described in Table 3.

Table 3. Services to FDPs from Ukraine with a PESEL number

A	Starting a business
B	Employment

C	Recognition of medical diplomas
D	Free access to education
E	Free access to healthcare
F	One-time cash payments to individuals for 300 PLN
G	Participation in the 500+ program, which allows parents to obtain 500 Polish Zloty per month per child under the age of 18
H	Access to social welfare financial assistance for persons below a certain income threshold
I	Free access to most public transportation

A detailed account of the legal framework pertaining to access to services and employment opportunities for Ukrainian refugees is provided in sections 2.3 and 2.4.

2.3 ACCESS TO SERVICES

2.3.1 Emergency psychological, legal, and financial assistance

The Polish government has provided extensive emergency social and financial support to the Ukrainian FDPs who came to the country after February 24, 2022, in addition to the already existing benefits resulting from the bilateral conventions. Since the already existing benefits resulting from the bilateral conventions. Since the start of the war in Ukraine, FDPs have received free support from the Justice Fund under the nationwide Victims Assistance Network, which supports all victims of crime, including war crime victims. This primarily consists of legal, psychological, and material assistance, and the Justice Fund also provides financial support to units belonging to the public finance sector.²⁵ As of June 30, 2022, almost 10,000 people from Ukraine have benefited from the assistance offered by the Victim Assistance Network, and between January-May 2022, over 18,000 reports were handled via a hotline.

2.3.2 Access to housing and personal property

a. Financial benefits for Polish citizens hosting Ukrainian FDPs

Hundreds of thousands of Polish citizens have provided housing for the Ukrainian FDPs. The authorities have supported hosts through cash payments. Under the Ordinance of the Council of Ministers of May 4, 2022, which stipulates the amount and conditions for the cash allowance for providing accommodation and meals to Ukrainian citizens, Polish citizens can apply for a cash allowance of 40 PLN per person per day. This financial assistance is available to the hosts who have been providing room and board for up to 120 days, starting when the Ukrainian FDP entered Poland.

The Polish government expects all FDPs who came to Poland due to the Russian invasion should become more or less independent after the first 120 days in the country. Extensions to the 120-day period for support may be allowed, with the consent of the gmina (municipality), for those who may not be able to achieve financial independence after 120 days, notably handicapped persons, senior persons, pregnant women, young mothers with babies and persons taking care of more than three children. Since May 27, 2022, support for hosting has been facilitated through a central database registering applications for such financial assistance.²⁶

b. Access to other forms of housing for Ukrainian refugees

Like all foreigners, Ukrainian citizens may buy real estate in Poland but may be subject to obtaining permission. Residents of other countries must obtain permission from the Polish Ministry of Internal Affairs before purchasing certain kinds of property in Poland (parcel or building). However, for apartment purchases, there is no need to obtain such permission. For properties that require approval, permission is issued if the property is not a threat to national security and cannot cause a violation of public peace, and does not contradict social norms and public health. The buyer must prove a connection with Poland.

Many Ukrainians who fled the war seek a place to stay, whether temporarily or long-term. As a result, the demand for apartments for rent has spiked in the large Polish cities that have been FDPs' main destinations. This has further elevated rental prices and increased housing search costs.

2.3.3 Access to education and training

The Act of March 12, 2022, on Assistance to Ukrainian Citizens, opened all levels of schools and education establishments to Ukrainian citizens. As a result, 182,000 Ukrainian²⁷ have registered in the Polish education system on the same basis as Polish children, which is free of charge. In addition, each school organizes Polish language classes and, whenever possible, hires Ukrainian teachers. The following provisions were adopted to support access to education:

- Financial support for local government units from the reserve of the educational part of the general subsidy and the Assistance Fund.
- Co-financing of pre-school children aged 3-5.
- Co-financing the costs of transporting students to schools and care institutions.
- Possibility to create temporary other locations for teaching, educational, and care activities subordinated to a given school or kindergarten - so that the admission of new students does not interfere with the work of the institution.
- Possibility to create inter-school preparatory departments.
- Possibility of employing additional teaching staff in the form of teachers and teachers' help (including teachers using the compensation benefit without suspending the right to this benefit).
- Possibility to assign overtime to teachers already employed more than 1/2 of the weekly compulsory number of hours of classes (subject to the teacher's consent).
- Exemption from fees for confirming education - applies both to persons who are not Polish citizens and persons who are Polish citizens who have been educated in schools operating in the education systems of other countries.

- Financial assistance of a social nature for students from Ukraine (school scholarships, school allowances).

It is important to note that children and students from Ukraine who came after February 24, 2022, and study in a school or kindergarten operating in the system of the Ukrainian state in the form of distance learning, are not subject to the obligation of one-year preschool preparation, school compulsory or compulsory education within the meaning of Polish law.

As far as training for potential employees is concerned, the local employment bureau has experience in organizing training and skill enhancement sessions and can advise in interview preparation. Ukrainian FDPs can use the services of local employment bureaus on the same basis as Polish citizens; however, no such training has been organized so far. Similarly, medical guilds have the potential to enhance the skills of Ukrainian medical professionals.

However, language and social integration remain important barriers. The primary obstacle to attending training and enrolling in education is the need for the Polish language. Several NGOs, such as Fundacja Ocalenie, offer not only Polish language classes, but also cultural mentoring to help refugees from Ukraine navigate the labor market. The resources of NGOs, however, are very limited and such help is provided on a voluntary basis. Support from the Polish authorities could enhance this skill building capacity.

In addition to language needs, another important aspect is the social integration of newcomers, which is needed to enhance Ukrainian FDPs' access to education and training. Ninety percent of refugees from Ukraine are women with children; thus, for them to take up professional training or employment, childcare would need to be provided. Polish nurseries and kindergartens are already stretched out, and many Polish families have to resort to private preschools, being themselves on waiting lists for free public institutions.

The Polish government mobilized PLN 13 million from European funds to extend training options and employment assistance for Ukrainian FDPs. The funds will be allocated to training, internships, and courses, and legal, psychological, and advisory assistance. Ukrainian FDPs get Polish language courses, learn how to find legal employment, and learn how to cope with Polish procedures.²⁸

2.3.4 Access to healthcare

The Act of March 12, 2022, on Assistance to Ukrainian Citizens, equipped those fleeing the war with the same rights to access the health care that Polish citizens enjoy (with some minor exceptions). In addition, as mentioned above, qualified medical personnel from Ukraine can join the workforce in Polish hospitals, provided that a medical staff shortage exists and language and cultural gaps are filled.

New digital solutions have been created to make it easier for FDPs to live in Poland. LikarPL is an application developed by the Ministry of Health. It is intended to reduce communication problems encountered by refugees during doctor appointments. The application allows users to fill in a form containing basic information about the patient's health in Russian, English, or Ukrainian and will provide the doctor with data transcribed into Polish. It also works the other way, transcribing information from the doctor into Ukrainian.

2.3.5 Access to social services and welfare

Pursuant to a Bi-Lateral Convention between Ukraine and Poland on Social security,²⁹ Ukrainian FDPs can claim their retirement pension in Poland and apply for additional financial assistance granted under specific social circumstances. The Bilateral Convention between Poland and Ukraine on Legal Assistance in Civil and Criminal Proceedings,³⁰ gives Ukrainian FDPs free legal assistance in Polish courts, including translating documents and interpreting. This is particularly useful in establishing legal guardians for Ukrainian

children who came to Poland without parents. At the end of May, almost 715,000 workers from Ukraine were reported to have disability and pension insurance.³¹

2.4 ACCESS TO ECONOMIC OPPORTUNITIES

2.4.1 Employment

a. Facilitation of hiring procedures for employers of Ukrainian refugees

The Act on Assistance to Ukrainian Refugees simplified the hiring procedures related to foreign workers concerning the Ukrainian FDPs. Employers do not need to apply for a foreigner's work permit but can simply notify the local employment bureau (Urząd Pracy) of hiring a Ukrainian citizen within 14 days of the beginning of employment. According to the Ministry of Family and Social Policy, more than a quarter of a million (255,000) Ukrainian citizens have already started work in Poland based on a simplified procedure that has significantly streamlined and accelerated the employment process.

The Polish government has facilitated access to employment to the maximum extent; however, employment costs remain high. Barriers to employment are general as employers complain about the costs of employment (40% of salary is paid by the employer to social security (ZUS)) and the employer's costs of ending the employment (statutory compensation and those imposed by trade unions). A popular way of intermediation that emerged in Poland to fill in these positions is to outsource companies that specialize in employing Ukrainians.

Such intermediation could be compiled with skills enhancement. Yet, more incentives are needed for the outsourcing companies to make such investments, e.g., fiscal exemptions like those offered in free zones or reduced social security (ZUS) dues, as many of the Ukrainian FDPs will eventually return to Ukraine.

Another challenge comes from Polish employers, who may be reluctant to employ Ukrainians as they cannot trust that the time invested in the employment and job training process will not be lost. Ukrainians may leave Poland, and the Polish favorable employment rules will not apply in such cases. For instance, employers of larger groups of Ukrainian FDPs in the agriculture sector could also consider providing free transportation to their workplaces where they may not be readily accessible by public transit or require substantial transportation costs.

b. Recognition of qualifications and access to the labor market

Thanks to the Polish-Ukrainian bilateral agreement on mutual recognition of university-level diplomas, most Ukrainian FDPs are able to undertake employment in Poland. However, there are sectors where an additional certification is needed, such as architects, veterinarians, medical professionals, etc. The Act on Assistance to Ukrainian Refugees allows doctors, nurses, dentists, and midwives to practice in Poland for a period of up to 18 months. It might still be necessary to enhance the skills of Ukrainian FDPs, as not all medical procedures or equipment are the same.

2.4.2 Business creation and operation

On March 11, 2022, Poland issued an Act on Assistance to Ukrainian Citizens,³² providing a broad scope of protection, including the possibility of getting and starting a company. This step has been essential

for Ukrainian FDPs to start immediate integration into the entrepreneurial ecosystem. The Act on Assistance to Ukrainian Refugees states in Article 1, paragraph 9, that the law establishes special rules for creating and operating enterprises by Ukrainian refugees. However, the law does not specify what those rules are beyond the fact that a Ukrainian citizen can create a company pursuant to the same rules as Polish citizens. Contrary to the simplified rules for the employment of Ukrainian citizens, no simplified rules nor financial or fiscal incentives have been provided for Ukrainian entrepreneurs in the Act on Assistance to Ukrainian Citizens.

2.4.3 Access to finance

a. Banking

Poland has responded robustly in the area of facilitating access to financial services by Ukrainian FDPs.

On March 4, 2022, the Polish Financial Supervision Authority (Komisja Nadzoru Finansowego, KNF) issued a Guidance to Polish financial sector institutions on its position in relation to banking services for FDPs from Ukraine, underlying the need to facilitate access to finance and payment transactions, including establishing: (i) a basic payment account enabling deposits and withdrawals of funds both in cash and in the form of non-cash transfers, including transfer orders; (ii) a payment instrument (payment card) enabling the initiation of payment transactions with funds on the account, including payments using POS terminals and ATM withdrawals; (iii) complete exemption from fees, including for account maintenance or the issuance or use of a payment instrument; (iv) contract documentation in Polish, Ukrainian, English and Russian language versions; (v) meeting the requirements of strong customer authentication; and (vi) e-banking services.

In response, the Polish Banks' Association elaborated an extensive financial inclusion policy targeting all FDPs from Ukraine who arrived in Poland after February 24, 2022.

This policy included not only citizens of Ukraine and their families but all other nationals who were fleeing the war in Ukraine. In principle, Ukrainian FDPs have been given access to all financial services and products in the Polish banks as they are available to Polish citizens. Similarly, Ukrainian FDPs can open corporate accounts in case they establish new companies on the same terms as Polish citizens.

KNF also issued special guidance applicable to Ukrainian FDPs who have arrived with no identification documents to allow them to open accounts on limited terms.

The guidance assures that they can receive cash payments and other social benefits from public and private sources. The banks issued limited-use debit cards to provide easy access to such financial resources. The limited terms include: (i) an account can be open for a maximum period of one year; (ii) the maximum amount on the account at one time cannot exceed the equivalent of EUR 1,000; and (iii) maximum one-time payment cannot be more than EUR 2,000. These limiting terms are just examples of prudential AML/CT measures proposed by KNF; however, banks are free to apply any other measures which they elaborated as part of their operations.

In applying the above guidance, Polish financial institutions undertook a number of initiatives to facilitate Ukrainian FDPs' access to finance, such as:

- Simplified procedures applied by some banks for customers of Ukrainian nationality related to the opening

In France, the bank **BNP Paribas** adapted its financial services to cater to refugees' needs. It invested in Nickel, a local startup that provides an alternative to classic banking by allowing refugees to open a bank account online at tobacco shops throughout France. This solution was especially welcomed by refugees from Africa and North Africa, who are not used to the traditional French banking system. BNP Paribas also lowered its residency requirements to open bank accounts in its branches, allowing asylum seekers to present their temporary residence permit while waiting for

of an account.

- Applied exemption from fees for its service and for payment cards or withdrawals from ATMs.
- Abolished fee on foreign transfers to Ukraine.
- Prepared Ukrainian language versions of their websites and document templates in a desired language (mostly Ukrainian, Russian, and English) and established a helpline in Ukrainian.
- Concerning settlements of transactions carried out in Poland through cards issued by banks from Ukraine, some Polish acquirers resigned from dynamic currency conversion at ATMs and POS terminals so that Ukrainian customers do not incur higher currency conversion costs at the time of purchase.
- Acted as an intermediary in the distribution of funds intended for Ukrainian FDPs, including encouraging the use of electronic banking services and mobile applications and – after obtaining a PESEL number beforehand – enabled the creation of a trusted profile, which gives access to aid funds, both from domestic sources, i.e., 500+ program funds, EU and those transferred by other countries or other institutions like the UNHCR.

One of the biggest challenges the financial sector faces is verifying the identity of FDPs with Ukrainian documents that have yet to be internationally certified. In most cases, the documents are issued only in Cyrillic scripture and are thus impossible to enter into the Polish system. Even more challenging are those Ukrainian FDPs who came to Poland with no identification documents at all, amounting so far to a few hundred. KNF issued guidance that accounts can be opened in such a case.

Yet, an identification document needs to be issued by the Ukrainian embassy or other relevant authority within six months. Otherwise, the bank account will be closed. Such measures were intended to protect the financial institutions from fraud, money laundering, and terrorism, but also the financial security of the country. The Polish Bank Association is in contact with the relevant national institutions on this specific matter and with the Ukrainian authorities to properly identify those people.

b. Credit

Ukrainian FDPs can open bank accounts following the same rules as Polish entrepreneurs. In addition, the Act on Assistance to Ukrainian Citizens was amended on April 8, 2022, to establish a Crisis Guarantee Fund (Gwarancyjny Fundusz Kryzysowy “GFK”) by Bank Gospodarstwa Krajowego to grant sureties and guarantees for the repayment of loans or other liabilities incurred by entrepreneurs (within the meaning of the Act of March 6, 2018 – Entrepreneurs’ Law) to ensure financial liquidity and financing investments. Such a surety or guarantee can be granted at the entrepreneur’s request.³³

The International Finance Corporation (IFC) launched a Digital Data Corridors initiative, which facilitates the digital exchange of credit information on Ukrainian FDPs between Ukrainian credit bureaus and those of host countries. IFC’s Digital Data Corridors initiative follows the “Know Your Client” (KYC) principles and allows for a more comprehensive verification of a potential customer. It brings together a coalition of credit information providers, financial institutions, and industry experts to allow financial institutions to work electronically across borders and receive international credit histories, identity verification, and bank transaction data in real-time.

With this information, Ukrainian FDPs in host countries will get easier access to credit cards, loans, and other services. The initiative is backed by the National Bank of Ukraine, Ukrainian Credit Bureaus, the Association of Consumer Credit Information Suppliers (ACCIS), and Poland’s BIK Group. The data exchange mechanism has

already become operational in Poland, Georgia, the Baltic states, the Czech Republic, Georgia, and Moldova. In fall 2022, IFC will help organize a series of events in these countries to further equip banks with the tools they need to tailor financial services to refugees' needs. The Polish Credit Information Bureau has already made its database available to any financial institution, telecom companies, and other service providers to facilitate the verification of identification and the credit history of potential borrowers.

c. Account ownership, cash, and exchange rates

Although Ukrainian FDPs can open bank accounts in Polish banks, one major challenge is presented by situations in which Ukrainian FDPs had to return to Ukraine for family reunification, to keep their jobs, or in connection with a summons to military service. In tens of thousands of such cases, those who opened a bank account in a Polish financial institution or even took a loan or a deposit gave no authorization to the immediate family to manage finances on their behalf. The banking sector, in agreement with the supervisory authorities, will do everything to resolve the issues faced by the families of Ukrainian bank account owners.

In addition, thanks to the Agreement between the National Bank of Poland (NBP) and the National Bank of Ukraine (NBU), Ukrainian citizens residing in Poland can exchange Ukrainian Hryvnia for Polish Zloty at the official rounded rate as of 25th of March 2022. The bank PKO BP has created separate desks in its branches, enabling this service. As part of the PKO BP and NBP program, 13,000 Ukrainians exchanged the Hryvnia into Zlotys within the first three days. The exchange rate set for this operation by the NBP is 0.14 Zlotys per Hryvnia, as opposed to 0.05 or 0.03 zloty on the exchange market before the Agreement between the two central banks was reached.

None of the participants of the operation charges any exchange fees. Adult citizens of Ukraine can exchange up to 10,000 Hryvnia per person. NBP will sell the purchased Hryvnia to NBU at the same rate. NBP intends to buy from NBU up to 10 billion Hryvnia in cash. This approach was a European pioneer, later followed by other EU countries like the Czech Republic and Belgium. The European Central Bank eventually followed the trend to allow for the Hryvnia/Euro exchange.

PART 3 – MARKET CONDITIONS AND SUPPORT FOR FDPs’ ECONOMIC EMPOWERMENT

The local private sector has a crucial role in the integration of refugees from Ukraine into the Polish economy. Local companies can be employers, business partners, investors, or develop products and services for the refugees. This part of the diagnostic examines the market conditions for the economic integration of Ukrainian FDPs and highlights the role of local companies. This part also examines the role of local actors – local authorities, NGOs, or development institutions working on the ground – in accelerating the engagement of FDPs from Ukraine with the local private sector and their integration into the Polish economy.

3.1 ASSESSMENT OF THE POLISH ECONOMY AND LABOR MARKET

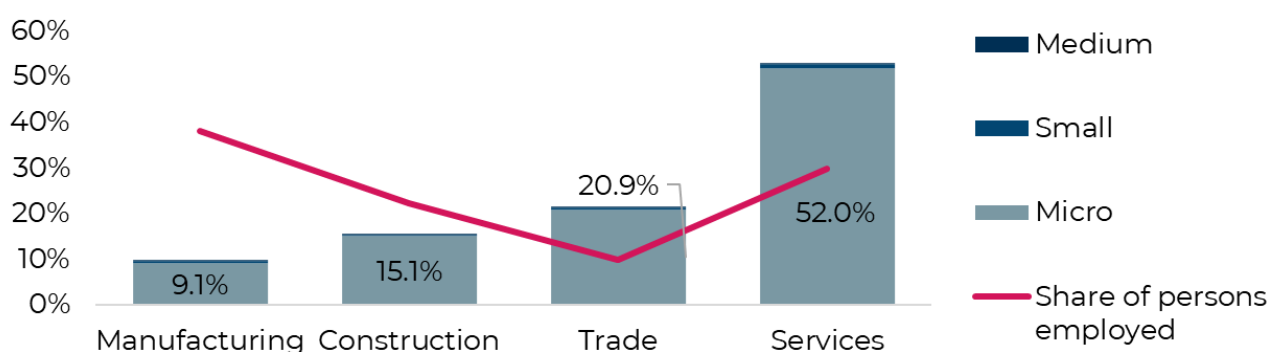
3.1.1 MSMEs composition in Poland

The Polish Agency for Enterprise Development reports that the number of Polish enterprises has steadily grown in recent years. In 2020, nearly 2.3 million non-financial enterprises, described as active, operated in Poland. The MSMEs sector accounts for 99.8% of enterprises in Poland. Micro-enterprises are 2.2 million, accounting for 97% of total enterprises in Poland. Small companies’ share in Polish enterprises’ structure is 2.2% (495,000), medium 0.6% (144,000), while large companies are only 3,700.

The majority (87.2%) of all entrepreneurs from the MSME sector are in a sole proprietorship.³⁴ Although since 2011, the number of medium-sized companies in most EU countries has increased, Poland was one of the four countries where it decreased, while the share of micro and small companies increased.³⁵ In the second quarter of 2022, 93,660 business registrations were recorded, i.e., 1.3% more than in the corresponding period of the previous year, and 80 bankruptcies, i.e., 4.8% less than in the second quarter of 2021.³⁶

The analysis of the industry structure of MSMEs shows that the largest group comprises companies from the Services sector (53.0%) (Figure 1). Nearly every fifth company operates in Trade (21.6%), and almost every seventh – in Construction (15.5%). Every tenth of MSMEs (10.0%) operate in Manufacturing. The sectoral structure of large companies operating in Poland differs significantly from that of the MSME sector, e.g., more than half (51.6%) of large entities conduct manufacturing activity.³⁷

Figure 1. MSMEs according to sectors and employed persons’ share in Poland in 2020



Source: GUS³⁸, own development

The enterprise sector accounts for nearly three-quarters of GDP (72.3%), and MSMEs generate almost every second zloty of GDP (49.6%) in Poland. Micro-enterprises have the largest share in the creation of GDP – about 30.6% (data for 2019). Almost 6.8 million people worked in enterprises in the SME sector, i.e., 67.8% of the total number of employees in the enterprise sector. The largest number of people worked in micro-enterprises (nearly 4.2 million people – 41.8% of the total number of people working in the enterprise sector), much less in medium-sized companies (over 1.5 million people) and the least in small ones (just over 1.0 million).³⁹

The latest data about MSMEs' composition in Poland was published by the National Statistics Office in October 2021, presenting data from 2020. As a result, there is limited knowledge of changes in MSME composition that might have happened due to the arrival of FDPs from Ukraine to Poland.

3.1.2 Labor market supply-demand and gaps

There are many jobs in selected sectors of the Polish economy, such as some low-level manufacturing jobs, hospitality, and warehouse jobs, which are less popular among Polish citizens. Yet, the need for labor is substantial. According to the Polish Economic Institute, many economic immigrants from Ukraine who came before February 24, 2022, work below their qualifications, usually in construction, industrial processing, or transport.

According to the Professions Barometer 2022 report, commissioned by the Ministry of Family and Social Policy, staff shortages concern as many as 30 professions and could be filled by FDPs from Ukraine.

The shortage of employees occurs in such sectors as the construction industry (including concrete mixers, carpenters, roofers and tinsmiths, bricklayers, and plasterers), the medical and care industry (including physiotherapists, doctors, nurses and midwives, rescuers, psychologists, and psychotherapists), manufacturing industry (electricians, welders, locksmiths), automotive industry (bus drivers, truck drivers, warehouse workers), educational industry (practical vocational training teachers), food and catering industry (cooks and bakers), the financial industry (independent accountants, accounting and bookkeeping staff). These are all areas where the Polish private sector has a powerful opportunity to do much more to integrate Ukrainian FDPs.⁴⁰

3.1.3 Historical and current supply chain linkages between Ukraine and Poland

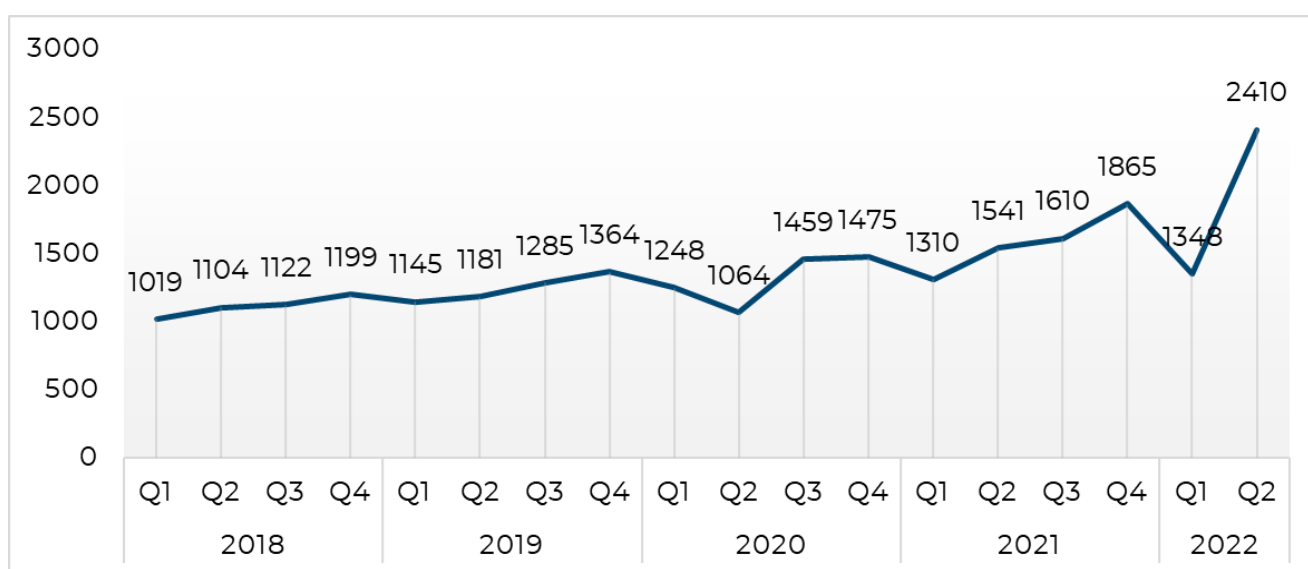
Poland has remained an important trading partner for Ukraine due to the implementation of Ukraine's association agreement with the EU in 2014 and the EU-Ukraine free trade area agreement since 2016 (DCFTA – Deep and Comprehensive Free Trade Area). Since 2016 the Polish – Ukrainian trade has been increasing regularly. In 2021, exports from Poland to Ukraine grew by 40% compared with the previous year, reaching USD 12.5 billion. The import from Ukraine boosted by more than 70% up to USD 5 billion.⁴¹ In 2021, Ukraine was also the 15th export partner of Poland, with approx. 2.2% share in the total Polish export. Poland was the second most important trade partner for Ukraine after China.

This trend did not stop with the conflict: according to Eurostat data, in the second quarter of 2022, Polish exports to Ukraine increased to EUR 2.4 billion, reaching the historically highest level despite the war. Compared to the corresponding period of 2021, the value of exports increased by EUR 870 million (i.e., by 56%). Customs duties on all Ukrainian exports to the EU have been suspended for one year from June 2022. The Ukrainian government reported that almost 80% of Ukrainian exports were sent to the EU in April, so removing tariffs will significantly strengthen the economy of a country attacked by Russia.⁴²

However, the substantial increase in exports is driven only by a few groups of goods, which resulted in a significant change in the structure of exports to Ukraine. The biggest export collapse was observed in the machine trade, electronic devices, and plastic products. According to the main categories (BEC classification), there was a decline in the export of consumer goods. In the second quarter of this year, fuels have become the most crucial export group, accounting for 21% of exports to this country (compared to only 2% in Q2 2021). Road vehicles were the second largest group in exports to Ukraine.

They accounted for 18% of all exports, thanks to the suspension of customs duties and VAT for importing cars. An increase in exports was also recorded in the groups of agri-food products, the biggest for fresh vegetables. The following groups are food with a long shelf life, i.e., canned meat and pasta, mineral water, and coffee. Meanwhile, Ukraine’s trade turnover is dropping- according to data published by the WTO, the value of Ukrainian imports in the second quarter decreased by 32% y/y, and the importance of exports by 46% (in US dollars).⁴³

Figure 2. Export from Poland to Ukraine, EUR MLN



Source: Eurostat

Polish investments in Ukraine also recorded significant growth in 2021. Total direct investment flowed from Poland to Ukraine in 2021 was USD 219.8 million, compared to USD 129.3 million in 2020.⁴⁴ The cumulative balance of Polish investments in the economy of Ukraine as of December 31, 2021, was USD 1.140 billion (of which 767 million are equity shares, and 372 million USD are debt instruments), which made it possible to overcome the 1 billion USD mark for the first time in recent years (for about ten years, the volume of Polish investments in Ukraine fluctuated at the level of 0.7-0.9 billion dollars).

The share of Polish investments in the economy of Ukraine from the total volume of foreign direct investments in 2021 still does not exceed 2% (7th place in the EU and 9th place in the world). The National Bank of Ukraine provides only general data about the foreign direct investments (FDI) in Ukraine since the war’s outbreak, which shows the collapse of FDI in the first quarter of 2022 (minus USD 314 million) and small recapture in the second quarter- USD 216 million comparing to USD 1202 million in 2ndQ2021).⁴⁵

About 3,000 companies with Polish capital were operating in Ukraine in 2021. The most significant amount of direct Polish investments (share in the capital as of 09/30/2021) went to Ukrainian industry - 42% (or USD 320

million), mainly in the processing sector (USD 305 million), financial and insurance activities (35%), wholesale and retail trade and repair of motor vehicles (16%), and the field of agriculture - 2.4%.

The number of companies run by Ukrainian citizens in Poland has increased (more than 20 thousand in 2021⁴⁶). Still, only USD 6 million of Ukrainian investments were attracted to Poland in 2021, which was 0.3% of the total volume of investments from Ukraine to other countries of the world. Most Ukrainian investments in Poland were invested in transport, warehouse, postal and courier activities - 3 million dollars, and in the industry – USD 2.2 million.⁴⁷

3.2 EDUCATION PROFILES AND EMPLOYMENT OPPORTUNITIES FOR UKRAINIAN FDPS

3.2.1 Education and skills of Ukrainian FDPs

About 50% of FDPs declared that they have a university degree. Meanwhile, according to the data from 2021 of the Statistical Office of Ukraine, 30% of Ukrainians over 25 years of age had an education equal to the equivalent of our bachelor's degree in higher education. Most often, higher education was declared by people aged 30-44 (60% of people from this group), but this level was also increased in other age groups.⁴⁸ The relatively low number of Ukrainian university graduates in Poland reflects the composition of FDPs from Ukraine and the proportion of people with higher education in Ukraine, i.e., 65% of women aged 30-34 in 2020 had a university degree. In addition, about 22% of FDPs have a vocational degree.

FDPs spoke Russian as a foreign language the most frequently (90%). In second place was English, the knowledge of which was declared by 50% of the surveyed people. Polish was known by less than every third of respondents (26%). Other European languages were relatively rare.

Professional profiles of people coming to Poland from Ukraine were remarkably diverse. Almost every 5th person declared they worked in Ukraine as a highly qualified specialist (17%). A similar share among FDPs was held by people working as teachers and employees of the education sector (15%), employees of the service sector (14%), and the trade sector (13%). Some people who are most lacking in the Polish labor market also fled to Poland – paramedics and nurses accounted for only 5% of FDPs, doctors 1%, manual workers and technicians 7%, and employees of the IT sector 2%. The other professional profiles of FDPs are office workers 7%, managers and managers 5%, students and students 5%, and entrepreneurs 3%. Only 6% of people were unemployed.⁴⁹

3.2.2 Employment opportunities for Ukrainian FDPs

a. Employment needs and obstacles

Data about the most important forms of assistance facilitating FDPs' stay in Poland shows that they generally expect support in the area of learning the Polish language (48%), help in finding a job (44%), and access to health care (40%). For younger people (below 29 years), the needs hierarchy are a little bit different: on the first place were the Polish-language courses, but on the second place was the recognition of diplomas and on the third- the organization of training courses authorizing them to perform specialist professions in Poland, i.e. activities that would suggest looking for a way to integrate in Poland.⁵⁰ While some barriers remain for Ukrainian FDPs to find jobs adequate to their skills, efforts are being made by the public and private sectors.

Government employment services are provided through public employment offices; however, these services are not often used by Polish companies. Public employment offices link Polish employers with job seekers and provide Ukrainian FDPs with financial support for their training from the National Training Fund. Unfortunately, our interviews indicate a lack of confidence from employers in the services provided by labor offices and a lack of knowledge of labor offices' supporting roles for FDPs. Additionally, although companies' job offers have been translated to Ukrainian on the official website for job advertisements from the Labor Offices (oferta.praca.gov.pl), interviewed companies were not aware of this, and they did not expect to be contacted by Ukrainian FDPs job seekers.

b. Opportunities for hiring FDPs from Ukraine

Some private companies have set actions to support FDPs in gaining appropriate qualifications. Amazon Web Services and two Polish universities—Warsaw School of Computer Science and WSB University in Dabrowa Gornicza - launched AWS Academy Cloud Foundations training available to Ukrainian FDPs free of charge to equip them with new digital skills.⁵¹ Adecco has set up a free job portal in Ukrainian and English for refugees and employers. Randstad has been providing direct financial support, mental health care, and employment opportunities to the fleeing families of its 3,000 Ukrainian employees already in Poland. Accenture Poland transformed the Carrots Academy for Women into an upskilling program to provide cybersecurity training to Ukrainian women refugees.

On completion, participants may receive job offers from Accenture or another employer in Poland. CD Project launched an internship program addressed to FDPs. They also provide accommodation (when needed), free lunches at the canteen and free Polish classes. They received over 1,300 applications for eight positions. Forbes Women has launched a series of webinars for people from Ukraine aimed at helping them find work in Poland. Many activities of publishing job offers and qualification improvement for FDPs can be counted.

Data show that Polish enterprises are open to hiring FDPs from Ukraine. A Randstad survey shows that a quarter of companies plan to hire FDPs. Nearly 25% of firms are planning to create additional positions, and 10% will both create additional positions and try to propose existing vacancies among FDPs from Ukraine. Companies mostly plan to offer employees from Ukraine up to 5 jobs (38%), with nearly 15% of companies planning to provide them with between 5 and 10 positions and over 5% – from 10 to 50 positions.⁵²

The possibility of employing employees from Ukraine is expressed most often by large enterprises (almost half of them). The smaller the company, the less it is open to the employment of FDPs. Data from the recruitment portal confirms the employers' declaration. In February 2022, 1.3% of job advertisements were marked for Ukrainians on pracuj.pl portal (the most popular job advertisement portal in Poland). After one month, it was 15.6%, and in April 2022, 19.3%.⁵³

According to data from Randstad's survey, the largest number of jobs for FDPs is offered by Polish companies in the catering and hotel sector (47%), construction (33%), and industry sectors (30%). About 15% of companies from the IT, financial, and insurance industries also intend to open their doors to employees from Ukraine who are in Poland due to the war.⁵⁴ Only 16% of trade companies consider employing FDPs. Due to the language barrier in face-to-face customer service, those are likelier to be wholesale than retail companies.⁵⁵

Six out of ten surveyed companies declared that the positions offered are for manual workers without the required qualifications; 40% are jobs for qualified manual workers and technicians. About 10% see the possibility of employing Ukrainians as specialists and engineers. On the other side, 12% of companies considered that the professional profile of migrants does not match their recruitment plans, especially by service companies (17%).

Interviews with Polish entrepreneurs reveal the existence of different strategies for hiring FDPs. The companies that had already carried out extensive Corporate Social Responsibility (CSR) activities were the most involved in helping FDPs. They offered free accommodation for refugees, help with childcare, and offered a first job that did not require knowledge of Polish or high qualifications. Another group are companies that have employed FDPs purposefully and have tried to help them settle in Poland or reconcile work with childcare. Also, in this group, FDPs worked in positions that did not require high qualifications.

Still, entrepreneurs were willing to establish long-term cooperation with them, e.g., investing in developing their competencies. The last group of respondents were companies that were open to employing foreigners but did not envisage any special support for FDPs and rejected the possibility of hiring FDPs who don't have appropriate language skills.

According to data from Randstad's survey, employers consider various tools to support their FDP employees. Most employers focus on the induction process that prepares employees to work in a company (49%). Companies indicated training planned by employers to improve the qualifications of employees and their families as the appropriate solution (30%) and assistance in accommodation (30%). Some employers also see the need to create suitable conditions for employees (e.g., by organizing childcare) and the need for support in learning Polish.

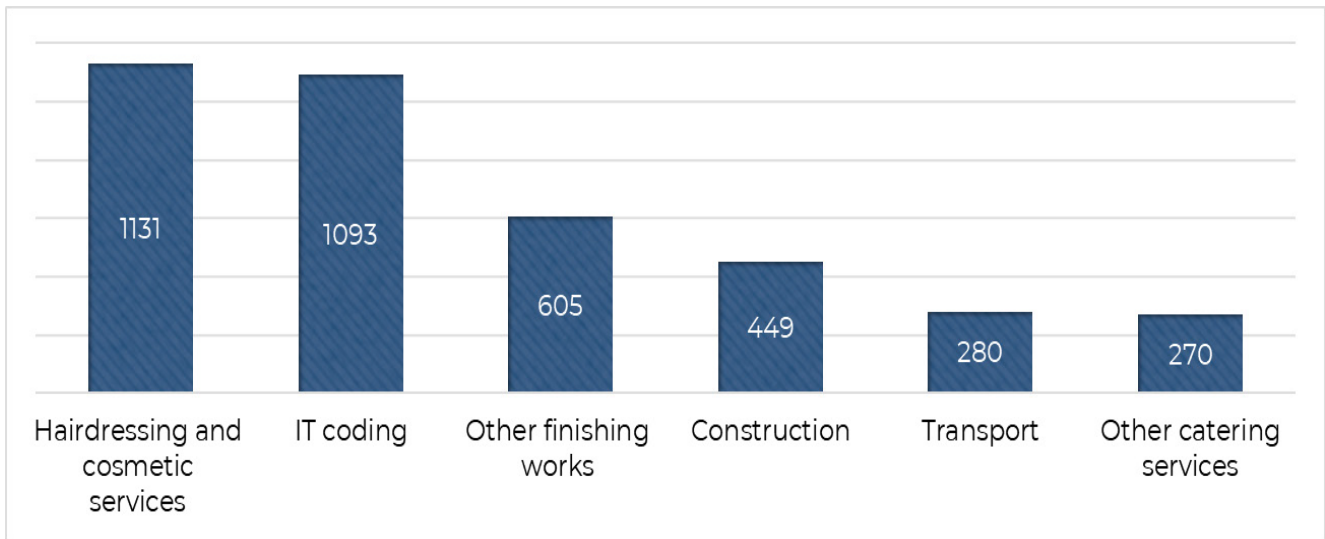
Additional help needed is also financial subsidies for families (13%).⁵⁶ Data show that a particularly huge challenge to hiring FDPs is reconciling childcare with refugee mothers' professional work. More than half (63%) of FDPs arriving in Poland have at least one child under their care, so it is important to adapt employment support instruments to the specifics of independent mothers.

3.2.3 Entrepreneurship and self-employment opportunities for Ukrainian FDPs

a. Entrepreneurial tendencies and business relocation of FDPs from Ukraine

Statistics show that FDPs are willing to set up businesses. After February 2022, there was a significant increase in the number of new business activities established by Ukrainian citizens in Poland compared to previous years. By the end of 2021, there were 7,117 business activities established by Ukrainian citizens in Poland, of which 6,310 were active. By the end of August 2022, persons from Ukraine had submitted 9,374 applications to establish a business in Poland, of which 8,446 are still active. These are mainly service activities - the most popular industry is hairdressing and beauty services, and IT coding. This year, the highest number of companies was set up by Ukrainian citizens in the provinces of Mazowieckie (2,262), Dolnośląskie (1,473), and Małopolskie (1,285). Pomerania is ranked 4th, and Wielkopolska 5th (1,040 and 701, respectively).⁵⁷

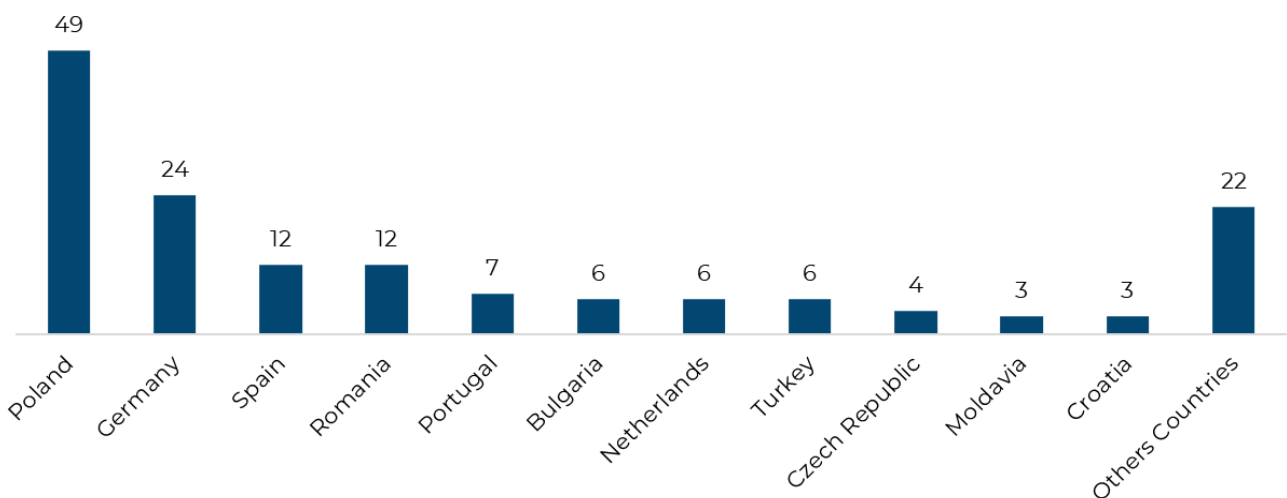
Figure 3. Applications for starting a business activity by people from Ukraine in 2022 in Poland (until August 2022)



Source: Infocredit

IT specialists and firms are especially attracted to relocate to Poland, as this was a booming sector in Ukraine. Thanks to the fast relocation of employees to other countries such as Poland, the IT sector maintains growth, albeit slower, even after Russia’s invasion in late February. Before the war, the sector employed 285,000 IT professionals, and in the first quarter of 2022, including over a month after the war, the sector’s export income reached a record \$2 billion. However, according to Ukrainian IT companies, some customers do not want to sign contracts if the services are delivered from Ukraine or the company is located in Ukraine because of operational risks of business continuity or security issues. In total, 49 companies have relocated some of their staff to Poland, and 21 companies plan to open an office there, making Poland the leading destination for relocation from the Ukrainian IT sector (Figure 2.). Other popular destinations are Germany (24) or Spain (12), and Romania (12).

Figure 4. Destination countries for relocations of Ukrainian businesses in the IT sector since 24 February 2023



Source: IT Ukraine Association

b. Public sector support to the entrepreneurship of FDPs from Ukraine

The Act of 12 March 2022 provides funds for the disposal of Labor Offices to support business launching by FDPs. The maximum amount of subsidy for starting a business corresponds to 6 times the average salary, which means that in 2022 it amounts to as much as approximately PLN 36,000 and can be used to purchase the necessary equipment. To be able to apply for co-financing for the start of a company with Labor Offices, each person must meet certain criteria, e.g., they cannot have run a business in the previous 12 months. They must provide documents confirming the necessary qualifications for delivering specific services. The Polish Agency for Enterprise Development produced and published an online course in the Ukrainian language on how to set up a business in Poland.⁵⁸

Entrepreneurship support programs for FDPs in Poland are starting to appear, especially for women entrepreneurs. In September 2022, the Polish Agency for Enterprise Development announced recruitment to the program “Vocational adaptation and supporting entrepreneurship among women - war refugees from Ukraine.” The program’s primary goal is to support women from Ukraine to find their place in the Polish labor market. The program includes participating in a 3-month Polish language course, training, workshops, and mentoring meetings.⁵⁹ Another project dedicated to women from Ukraine is called “Rebuilding Ukrainian Business - Entrepreneurial Women,” which offers business training, individual consulting, and a USD 4,000 voucher for needed assets.⁶⁰

Our research has identified the existence of advisory support for relocating Ukrainian businesses or specialists to Poland. The Ministry of Digital Transformation of Ukraine requested the Polish Ministry of Development and Technology support in creating one consolidated center for supporting the entrepreneurship of Ukrainian citizens in Poland – Diia—business, which before the war operated in several cities of Ukraine through 11 Offices. In May 2022, The Polish Investment and Trade Agency provided its office space in Warsaw for the opening of Diia.Business free of charge for one year. Diia in Warsaw handled over 2,000 inquiries during the first three months of operation, mainly concerning business relocation from Ukraine to Poland. Additionally, experts from the private sector are involved in Diia. Business actions, i.e., the Bank BNP Paribas, offer support from experts in business-related matters and retail banking services, insurance, and the financial market in Poland.

c. Support from the private sector to the entrepreneurship of FDPs from Ukraine

Some private sector-led initiatives supporting FDP entrepreneurship in Poland have been identified. In March 2022, Google invited Ukrainian startups to use Google Startups Campus Warsaw space as a temporary office and launched a \$5 million Google for Startups Ukraine Support Fund to allocate equity-free cash awards with mentoring and digital infrastructure support.⁶¹ StartupsTotalizator Sportowy is preparing the launch of a dedicated CVC, Blue, and Yellow Fund to support startups and scale-ups from Ukraine. The intention is to facilitate investments from both Totalizator Sportowy and outside investors in Poland and the US in companies founded by Ukrainian teams based in Poland or with a Polish Nexus.⁶² However, these initiatives seem like they need to be more cohesive. Currently, neither the governmental Polish Development Fund nor any equity fund associated with the Polish Private Equity and Venture Capital Association (PSIK) has announced dedicated support for FDPs startups.

The preponderance of businesses in IT sectors relocating from Ukraine to Poland is accompanied by initiatives to support this sector. The IT Ukraine Association ensures the continuity of cooperation between the Polish and Ukrainian IT markets by creating a Central European IT hub that could serve companies worldwide.⁶³ At the same time, the Polish Investment and Trade Agency continues its activities under the program Poland. Business Harbor offers a full range of services to help IT specialists, startups, and companies

relocate easily to Poland from Ukraine and Belarus. Until May 2022, the Agency issued 22 thousand visa recommendations for people from Belarus and Russia and conducted 12 processes of companies' relocation from Ukraine to Poland.

Business organizations also support Ukrainian entrepreneurs, including those relocating their businesses to Poland. The Union of Entrepreneurs and Employers established The Business Center for Ukraine to support entrepreneurs from Ukraine in the process of temporary relocation to Poland and building new business-to-business relationships with Polish companies, offering legal assistance, connecting with partners, or searching locations to operate in Poland.⁶⁴ The Freedom and Democracy Foundation, in cooperation with the Legnica Special Economic Zone, organized the Summer School of Entrepreneurship “Business ABC for refugees from Ukraine.” Eighty participants took part in the workshops in Toruń and Legnica. The National Bank of Poland financed the project as part of the economic education program and covered legal and marketing issues related to running a business in Poland.⁶⁵ The Ukrainian-Polish Business Incubators acts as a part of the Warsaw Chamber of Commerce and provides dedicated activities to people from Ukraine to help them set up their own companies in Poland.⁶⁶

3.3 CONSTRAINTS AND OPPORTUNITIES FOR THE PRIVATE SECTOR

3.3.1 Refugee-related business models in Poland

The refugee crisis prompted the redirection of many business activities to the FDPs support area, which increased their operations' scale.

The creation of products or services to support FDPs' initial acclimatization in Poland is visible. One of the examples is the Ukrainian startup Lalafo, which trades in second-hand goods and has relocated its activities to Poland. It operates now as a charity project (lalafo.pl) which helps Ukrainians in Poland get free products with delivery across Poland. Another example of private sector activity in this domain is the establishment of a catering point in Warsaw by a Polish restaurant group that employs only FDPs and specializes in Ukrainian cuisine.

A digital solution has been developed by the Tropiciel application, which started as a simple tourist app showing walks through Lodz. Its founders were creating its Ukrainian-language version when the war broke out. They reacted quickly to the new context by creating an application aimed at Ukrainian refugees arriving in the city. Tropiciel currently contains information that will help with the first moments in the new city – among others, a list of aid organizations, a package of information necessary to legalize your stay, a list of schools in Lodz conducting preparatory classes for Ukrainian children, an index of mobile operators, including assistance in obtaining a Polish sim card, or the addresses of hospitals and clinics.

Companies react to the growing Ukrainian population in Poland by communicating in the Ukrainian language. Polish media platforms also provide access to Ukrainian-language news and materials. The Player.pl service has made available the transmission of the Ukrainian news channel “Ukraine 24” free of charge and without the need to log in. The OTT platform provides free access to popular children's fairy tales with Ukrainian dubbing or subtitles. Two news channels in Ukrainian – 1+1 and Espresso.tv – are still available completely free of charge on the TVN24 GO platform. The Ukrainian section of Onet also offers Onet Email in Ukrainian. The users enjoy free access to email without popping up ads and with a bigger mailbox capacity.

3.3.2 Refugee-related investment opportunities for supporting inclusive growth

The outbreak of the war and the related wave of FDPs in Poland influenced various categories of investment opportunities in Poland, mostly focused on the humanitarian needs of FDPs from Ukraine and the need for reconstruction of Ukraine once the conflict ends. In this regard, more needs to be done to stimulate the appetite for refugee-related investing among Polish investors that goes beyond fulfilling humanitarian needs through awareness and more assessments and studies.

Firstly, creating the support infrastructure for FDPs settling in Poland. On 15 June, the European Investment Bank (EIB) approved a €2 billion investment in Poland to help the country accommodate Ukrainian refugees. The EIB credit line will make financing available for developing key infrastructure and services for refugees and host communities, such as housing, schools, hospitals, and job access. EIB financing can also cover eligible operational expenses related to the supply of equipment, facilities, and services integrating war refugees in host countries.⁶⁷

Secondly, preparation for the future reconstruction of Ukraine and the related involvement of Polish business in this process. The reconstruction of Ukraine after the ongoing war is over will bring Poland's economy up to 190 billion zlotych (€38.9 billion), equivalent to around 3.8% of its gross domestic product (GDP), finds a report by Polish bank Pekao S.A.⁶⁸ In June, the Polish government (Ministry of Development and Technology) launched registration for the cooperation program to prepare for the resumption of exports and the post-war reconstruction of Ukraine. The program operator is the Polish Investment and Trade Agency (PAIH). Over 1,200 Polish enterprises applied, interested in exporting, investing, and cooperating with Ukrainian contractors as subcontractors.⁶⁹

Thirdly, the unstable situation makes Poland a place where Ukrainian companies want to locate their business, which entails additional investment from Ukrainian investors. For instance, the Novopak company, specializing in producing metal packaging, has been planning to expand its operations to the Polish market for a long time. The war accelerated this decision, as his main manufacturer was located close to Russia's border. Nowopak is investing over PLN 20 million in a production hall in Poland, where it will produce metal packaging.⁷⁰

3.3.3 The role of the Ukrainian diaspora and networks in supporting integration of Ukrainian FDPs

According to data from the Joint Research Centre, there is a clear correlation between the size of the existing Ukrainian diaspora in a given country and the number of new Ukrainian immigrants in that same country each year. This correlation can be explained by the important role of pre-existing contacts, family, or friends in helping FDPs navigate the bureaucracy of a new country and find accommodation, employment, and education opportunities.⁷¹ Even before the war, Poland had a large Ukrainian community of workers and students. According to a report of the Paweł Adamowicz Centre for Analysis and Research of the Union of Polish Metropolises, over 1.5 million Ukrainians over 15 years of age were in Poland at the moment of the war's outbreak.⁷² For many years, Poland has been an important destination for labor migration of Ukrainians, who represented 3/4 of total foreigners registered in the social insurance system (ZUS), i.e., 650,000 in Feb 2022.⁷³ Additionally, the number of students from Ukraine enrolled at Polish universities also reached a record level of 34,725 in December 2021.⁷⁴

Poland was a familiar country for some FDPs and their families and friends because of their previous employment experiences in Poland. About 12% of FDPs declared that their friends had previously lived in Poland, and about 14% had been working in Poland and were just staying temporarily in Ukraine at the

moment of the war's outbreak. For about 28% of FDPs, migration to Poland was not something new because they had members of their family who had been working in Poland and could provide information about the country. On the other hand, for more than 50% of FDPs, Poland was a completely new place, unknown either from personal experience or from the relationships of relatives and acquaintances.⁷⁵

The interviews conducted among entrepreneurs employing FDPs indicate the important role of personal connections with the Ukrainian diaspora in supporting FDPs. Relatives and friends living in Poland were the first option for seeking accommodation after crossing the border for many FDPs, and for finding a job, often by asking for personal recommendations in the current place of employment. In addition, NGOs founded by the Ukrainian diaspora provided first aid for many FDPs. E.g. Ukrainian Home is a foundation founded in 2009 to support Ukrainian migrants in Poland and familiarize Poles with Ukrainian culture. The Ukrainian Home currently acts as the crisis headquarters, helping FDPs directly and effectively organize targeted aid for Ukraine.⁷⁶

3.4 STATUS OF LOCAL INITIATIVES ADDRESSING FDP INTEGRATION AND SUPPORT

Some initiatives to integrate FDPs from Ukraine have taken place at the local level, others from non-governmental bodies, and they play an important role in offering local solutions, alleviating constraints, and offering temporary or long-term solutions.

3.4.1 The role of local authorities

Many Voivodes, who are regional representatives of the government, currently provide financing from the Assistance Fund (Fundusz Pomocy) to local governments (cities, gminas) to provide help to integrate refugees from Ukraine into local communities. Within the first three months of the conflict in Ukraine, local governments have received 1.8 billion Zlotys.⁷⁷ These funds were used for various activities related to assisting FDPs from Ukraine, including providing Polish lessons, organizing job fairs, providing assistance in the local labor offices in acquiring skills necessary to start an economic activity or get employed, and financing operations of NGOs in the area of employment networking, legal and cultural advisory services, and material, psychological help. Similarly, Fundacja Ocalenie NGO has been heavily involved in organizing cultural mentoring to integrate Ukrainian refugees into the local market by providing training on starting a company, tax, social security payments, etc.

However, local authorities also face significant challenges deriving from the high number of FDPs from Ukraine. The City of Warsaw, for instance, faces challenges in integrating new residents, who now constitute approximately 10% of the current city's population, while trying to retain the existing quality of services and urban life, including transport, education, and public security. The challenge is seen from a short-term perspective; however, it is also accompanied by a lack of long-term systematic solutions, including financial support. For example, the existing school infrastructure is near capacity. The registration of 23,000 new children in primary schools in the city would constitute almost 18% more children in the Warsaw educational system. For preschoolers, the respective number would amount to 20% more children. In addition to school capacity, finding and employing hundreds of new teachers, and adding dozens of new school facilities will amount to constraints in time and financial resources, estimated to be in billions of zlotys.⁷⁸

3.4.2 The role of humanitarian organizations

Ukrainian FDPs in Poland have had access to the United Nations System. In particular, the UN Refugee Agency (UNHCR) rolled out a cash assistance program in March 2022 by establishing eight cash enrollment centers in the main refugee hosting areas, including Warsaw, Krakow, Poznan, Wroclaw, Ostróda, Gdynia, and Gdansk. Over 100,000 FDPs from Ukraine received financial support from UNHCR to cover their basic needs, such as paying rent or buying food and medicine. Cash was provided for a three-month period to those most in need – serving as a transitional emergency safety net – until they could better support themselves or be included in government social protection systems. UNICEF provided cash assistance for children of families in the most difficult situation (over 300,000 children), complementing it with psychological assistance to over half a million children and their guardians.

Finally, the International Organization for Migration (IOM) launched financial support programs for housing (helping over 30,000 people), for the exchange of experience and information in the humanitarian aid sector and inclusion in the labor market, and the organization of local integration centers for foreigners in cooperation with local governments and NGOs.

3.4.3 The role of Chambers of Commerce and business associations

Chambers of Commerce and business associations have joined the process of direct assistance to FDPs, but also Ukrainian business, which is looking for opportunities to continue their work in conditions of war in the homeland or relocation to Polish.

Business organizations have responded to the refugee crisis by mobilizing member companies and animating pro-employment activities for FDPs. The largest Polish employers' organizations, such as the Employers of Poland, Corporate Connections, BNI Polska, The Polish Business Roundtable, the Lewiatan Confederation, the Business Centre Club, and the Polish-Ukrainian Chamber of Commerce jointly implemented the coordinated action to provide humanitarian aid or shelter by associated companies. They also assisted in finding a job corresponding to FDPs' qualifications and provided legal support in formal procedures in Poland or language translations. The Recruitobus Personnel Service was also stationed there, in which Ukrainian citizens received detailed information in Ukrainian about the labor market, procedures, and job offers in Poland.⁷⁹

Business organizations were also the source of important information on how Polish entrepreneurs can help FDPs. The Polish-Ukrainian Chamber of Commerce (PUIG) launched the Support Center – Aid to Ukraine – the platform informing about border crossing regulations, legalization of stay and work, and employment offers for Ukrainians.⁸⁰ Other organizations provided help independently, e.g., The Wielkopolska Chamber of Commerce and Industry disseminated job offers offered by associated companies on their website.⁸¹

The Employers of Poland postulated many tax changes that could encourage companies to join the FDPs help. The government agreed to abolish the tax on the supply of goods and services for purposes related to helping the victims of the war in Ukraine.⁸²

Actions on a European scale are also organized- Eurochambres and ICC members launched the twinning aid program in May 2022 to enable national or regional chambers from other countries to establish bilateral relations with one of Ukraine's 25 regional chambers. Activities under this initiative include support in export, trade cooperation, or relocation of member companies or chambers' employees from Ukraine to European countries. Polish organizations are invited to join this initiative.⁸³

3.4.4 The role of Civil Society (CSO, NGOs, etc.)

Multiple NGOs are also supporting the institutional framework. NGOs in Poland such as Polska Akcja Humanitarna, Fundacja “Ocalenie”, Polskie Stowarzyszenie Edukacji Prawnej, Helsińska Fundacja Praw Czlowieka, and Amnesty International Polska have stepped in robustly into providing help to Ukrainian FDPs. For instance, the Polish Humanitarian Action (Polska Akcja Humanitarna or PAH), a non-governmental organization specializing in providing help to victims of the humanitarian crisis, has provided its vast logistical support at the Polish-Ukrainian border in Ukraine through its local office, and in Warsaw, supporting volunteers at the Central Railway Station and Warsaw Torwar Sports Facility. PAH, which has been helping war refugees since the beginning of the Balkans war and spreading to other countries in Africa and Latin America, has now established a separate section to focus solely on the humanitarian needs of Ukrainian refugees in Poland.

One of the tasks of the mission in Poland is to establish aid card distribution programs, providing psychosocial help and food support for children and young people in the refugee crisis, in addition to providing assistance on the Polish-Ukrainian border and at reception points. PAH is also envisaging support in employment, integration, access to Polish language learning, and global education. To meet the new challenges, Polish Humanitarian Action has started recruiting integration and capacity-building experts on a large scale. A total of nearly 100 people are envisaged to be employed, including specialists in logistics and supplies, obtaining grants, finance, and program management. One of the problems envisaged by non-governmental organizations such as PAH is the lack of insurance for volunteers beyond 30 days, as foreseen by the Law on Public Services and Volunteering.⁸⁴

PART 4: CONCLUSIONS AND RECOMMENDATIONS

As the reports outlines above, the most efficient way of integrating FDPs from Ukraine into the Polish economy goes through two pillars: (i) establishing a legal framework to allow FDPs' registration and access to work, housing, medical and social support, and to education – and ensure efficient de-facto implementation of such framework; and (ii) leveraging on the private sector to improve FDPs' self-reliance and resilience. Indeed, this study noticed opportunities for the Polish private sector in employing, doing business with, investing in, and developing new products or services for FDPs from Ukraine. However, this diagnostic also highlights a lack of awareness from the private sector on the opportunities coming from engaging with FDPs from Ukraine, and a lack of knowledge of practical “how-to’s.”

In this respect, while the Polish authorities have taken unprecedented steps to grant access to services to Ukrainian FDPs, efforts still have to be made to ensure their comprehensive and sustainable integration into the Polish economy. By looking at existing regulations, de facto implementation, and challenges, this diagnostic identified a set of recommendations for the Polish authorities and other actors involved in the economic integration of refugees from Ukraine. The recommendations below follow the 20 PS4R Principles (see Annex B) developed by the PS4R Platform to guide the private sector to enhance a successful and sustainable economic integration of refugees and policymakers and practitioners to enable the private sector to play this role for the benefit of refugees, local companies, and host communities.⁸⁵

4.1 CONTINUING EMERGENCY AND SOCIAL SUPPORT TO FDPs FROM UKRAINE

The Polish authorities have taken unprecedented steps to ensure the safety of FDPs from Ukraine and to start their integration into the Polish economy. However, further actions are needed to continue these efforts and accelerate Ukrainian FDPs' contributions to the Polish economy.

Recommendation #1: Continue the social support offered to Ukrainian refugees.

The authorities should ensure a long-term budget, at least until the end of 2023, to cover the needs related to the Ukrainian FDPs for at least 18 months committed in the Act on Assistance to Ukrainian Refugees. Part of such a budget can be used to also support NGOs and expand assistance in the areas currently broadly supported by NGOs by providing financial and logistical support in their provision of cultural mentoring, advisory in the area of starting a business, taxation, employing workers, Polish language skills, childcare, and psychological assistance.

The Government could also facilitate visa and work permits for international experts in specialized humanitarian help related, e.g., cash assistance experts, humanitarian help-related project designing experts, monitoring and evaluation experts in relation to project financing, delivery, and completion, safeguard and compliance experts. Finally, the authorities should protect volunteers by amending the law in order to extend the insurance beyond 30 days.

Recommendation #2: Introduce relevant amendments to the Act on Assistance to Ukrainian Refugees.

The following changes are suggested:

- Third-country nationals who are also fleeing the conflict in Ukraine and who are family members of Ukrainian citizens, their dependents, and other persons residing permanently in Ukraine, should have the same rights as citizens of Ukraine;

- Allow Ukrainian citizens who have applied for international protection and third-country nationals currently residing in Poland based on a 15-day consent of the Commander of the Border Guard Post after crossing the border after February 24 to legalize their stay in Poland for those who need it or cannot return to their country; and
- Allow persons granted temporary protection in Poland to apply for a Polish foreigner's travel document, and a temporary stay in Poland and for a long-term resident of the EU on the usual terms.

4.2 ENHANCING EMPLOYABILITY AND ACCESS TO WORK

Enhancing employability and access to work for refugees through customized programs is essential to integration and prepares them to access existing jobs that match their skills. Such programs should provide for skills mapping and training, including technical, vocational, and soft skills.

A similar approach to employment was taken by the **Colombian government** when an unexpected influx of an estimated 1.7 million people from Venezuela settled in Colombia—approximately 32 % of all Venezuelan migrants in Latin America. Colombia expects that the long-term economic benefits of this migration have the potential to outweigh the short-term costs. Recognizing that properly managed migration is a development opportunity, since 2015, Colombia has remained committed to exemplary open policies for the social and economic integration of Venezuelan migrants. These efforts include: (i) issuing work, transit, and stay permits; (ii) extending access to health, education, and social programs and housing subsidies; (iii) investing to benefit both host and migrant communities; and (iv) protecting vulnerable populations through programs to reunify families, protect children, and prevent human trafficking.

As noted in this report, Ukrainian FDPs possess some of the skills able to fill labor shortages in Poland, especially in the construction industry, medical and care services, manufacturing, transport, education, food and catering services, financial sector, and IT specialists. However, barriers to employability remain, such as knowledge of the Polish language and practical access to work, especially for working mothers. Relevant regulations need to be issued to assure diploma equivalence. Other enhancements could include eliminating other barriers to work (e.g., transportation to locations not accessible by public transportation, childcare to facilitate women's employment). In addition, barriers are also found among Polish employers, including a lack of trust in governmental employment centers and a lack of knowledge about the benefits of hiring FDPs.

Recommendation #3: Enhance the offer of Polish language courses and childcare.

A comprehensive framework supporting job search is essential to encourage employment, especially when more than half (63%) of FDPs arriving in Poland have at

least one child under their care. Such a framework should ensure access to childcare and learning the Polish language before any job-seeking support is offered, such as job-hunting, writing CVs, and filing applications. Childcare is deemed an important factor contributing to FDPs mothers' participation in the labor market or even in training/mentoring programs supporting employment.

Recommendation #4: Facilitate social dialogue with stakeholders and provide incentives to local MSMEs.

This assessment has noticed the lack of awareness from Polish companies on efforts undertaken by the government employment centers to foster employment of Ukrainian FDPs and the lack of confidence and trust from the private sector. The Government can facilitate social dialogue with employers and provide financial incentives to companies that employ refugees, collaborate with refugees, or deliver products or

services to them. This would also be an incentive for smaller companies to hire FDPs from Ukraine. It is crucial also to address potential disincentives to work among refugees, for example, the uncertainty of the timing of return to Ukraine, generosity of assistance, etc., and (2) the risk of poor working conditions, informal work, and low pay below the minimum wage.

To achieve this, the Government could create a broader Working Group, which would consist not only of the inter-ministerial members, National Chamber of Commerce, and Confederation of Private Sector Employers but also representatives of NGOs to collect information on the most current needs of FDPs leading to self-reliance, professional activation, and economic activity and discuss potential solutions at the governmental level. It is also important to build platforms to coordinate referrals and ensure the integration of services.

4.3 SUPPORTING THE ENTREPRENEURSHIP OF FDPS FROM UKRAINE

In addition to facilitating employment, the regulatory framework can facilitate inclusive entrepreneurship for FDPs. Government and business associations can organize programs to encourage self-employment as a viable livelihood strategy for FDPs. To help FDPs become successful entrepreneurs, a range of capacity building and training can be organized, and support in financing (startup funds) and help with networking are provided. Generally, there is a need for a connection between FDP entrepreneur support schemes and other specialized structures which can offer them language, digital or legal support, and training to lift peripheral brakes, such as administrative complexity, language, digital skills, or even discrimination and make one's entrepreneurship journey successful.⁸⁶

Recommendation #5: Provide business training and financial incentives for business creation and relocation to Ukrainian FDPs.

The Polish authorities should also focus on encouraging FDPs from Ukraine to leverage their capacities and entrepreneurial skills to create their own businesses to the maximum possible extent. All the forms of financial and social assistance quoted above are focused on help to individuals; however, systematic help in integrating Ukrainian FDPs in the local community or help with registering companies has yet to be provided. Current legislation allows Ukrainian citizens to create enterprises pursuant to the same rules as Polish citizens.

Yet, no additional simplifications or financial incentives have been introduced, and it is still easier for the Ukrainian FDPs to rely on financial support from the Government. The incentives could include startup grants or entrepreneurial assistance from business associations, like the Polish Chamber of Commerce. Establishing business incubators is another way the Government could help new and startup companies develop capacities to become successful. Such business incubators can be set up in major business universities or technological hubs but also in impoverished communities or areas with high unemployment to bring economic dynamism there.

Recommendation #6: Connect business training programs to entrepreneurship, peer support, and advice.

The Polish authorities could establish entrepreneurship programs that would create spaces and platforms to share and align best practices and evaluation frameworks and mobilize peer-to-peer support from groups and individuals, to evaluate newcomer competencies and experience. Such programs could be enhanced by the National Chamber of Commerce,⁸⁷ the Confederation of Polish Private Sector Employers Lewiatan,⁸⁸ or other local associations of employers. These institutions have the best experience advising on entrepreneurship, including providing guidance on starting a business, financial advisory services, accounting, employing workers, paying social security, marketing, etc.

They could also help build capacity by enhancing the visibility of entrepreneurial success stories to help deconstruct negative stereotypes in communities where they are appearing and contribute to changing the narrative on refugee entrepreneurship. The Polish Chamber of Commerce, also through its local branches, could play a critical role in matching the new entrepreneurs with the market needs, in relation to the products and services. Creating a bilingual interactive platform with information about market needs updated frequently could also be helpful. Those platforms could follow the model of job-seeking platforms such as www.pracawpolsce.gov.pl. It is thus recommended to consider enhancing legal, financial, and capacity-building tools which would incite Ukrainian FDPs to establish micro or small enterprises allowing them to gain financial independence and self-reliance and become part of the local community.

Recommendation #7: Create entrepreneurship programs at the local level.

It is also recommended to develop entrepreneurial and cultural integration programs at the local government level so that it is broadly accessible, not only in Warsaw or large cities. Each governmental body (e.g., ministries, voivodeships, municipalities, etc.) and non-governmental bodies and institutions (e.g., NGOs, CSOs, development organizations) could be involved in the development or application of relevant mentoring programs and further improvement of the legal and regulatory framework to ensure smooth integration of refugees into local business communities in order for them to become employers contributing to the community, pay taxes and rely less on help from the state.

As the Polish government envisages closer cooperation with non-governmental organizations, creating and implementing a separate plan to support those organizations in providing systemic assistance to refugees, including housing, and psychological support could also envisage support to local governments in creating entrepreneurship and cultural integration centers. Such centers could provide professional mentoring on business creation, taxation, employing workers, and related social security dues, etc. NGOs have voiced that the Ukrainian refugees are very willing to open their businesses but are overwhelmed with the unknown. Volunteers in big urban centers such as Warsaw often provide entrepreneurship-related assistance.

4.4 CATALYZING INVESTMENTS TO AND FROM FDPS FROM UKRAINE

No specific programs have yet been established in Poland to encourage refugee-related investment, which would be complementary to what is already available on the market. However, opportunities for refugee-related investments in Poland exist, especially in the growing IT sector, and in those sectors now more involved in trade with Ukraine, such as machine trade, electric devices, plastic products, fuels, road vehicles, and agri-food products. Geographical proximity and economic potential make Poland a prime target for relocation from the Ukrainian IT sector and a preferential trade partner in those sectors most needed during and after the conflict.

This is an opportunity to protect the jobs and security of their employees and, in the future, to strengthen economic ties between Poland and Ukraine, which will also bring corresponding benefits in the process of rebuilding Ukraine. The history of economic cooperation between Poland and Ukraine points to many investment opportunities between the two countries, particularly in the areas of industrial processing, IT, and food production. The European Investment Bank has mobilized investment funds for the necessary infrastructure in Poland needed for FDPs to settle (such as housing, schools, hospitals, and access to jobs), which will also stimulate private sector activity.

Recommendation #8: Encourage investments in FDP-related businesses.⁸⁹

Encouraging investments in support of businesses that benefit FDPs' economic integration is another way

through which the authorities can get involved. This includes working with investment funds and banks to introduce an “FDP lens” to investment and lending strategies, working with FDP-related businesses, and building company profiles for investment funds seeking investible deals. Authorities can also focus on promoting and attracting investments to FinTech solutions that can accelerate the financial inclusion of FDPs into the formal financial system while spurring technological innovation within host countries.

Recommendation #9: Attract Ukrainian investors.

Investments could also come from those FDPs from Ukraine who managed to bring with them capital. The role of government institutions, in this case, is that of allowing foreign investments by Ukrainians that can bring economic value while integrating FDPs in the Polish economy, for instance, by lowering requirements for investors. Likewise, governmental authorities could leverage the Ukrainian diaspora and possible investments coming from Ukrainians abroad.

A better understanding of Ukrainian investors and their success factors would allow for targeted support and investment that will not only create value for FDPs and Polish communities but will also play a critical role in preparing for the reconstruction and development of Ukraine once FDPs are able to return safely. A study could be conducted on the appetite of investors in supporting FDP-related businesses in Poland, especially in sectors that are under-employed by local workers. The study could also test the investment appetite of outsourcing companies.

Following the arrival of refugees from Syria to **Türkiye**, there has been an increase in Foreign Direct Investments (FDI) by Syrians in Syrian-owned or jointly Turkish-Syrian companies. The government has had a sophisticated response to the refugee crisis, giving refugees access to basic services, exploring avenues to secure income and formal employment, and engaging with the global community to adequately support this population. One such facilitation is the enactment of the Foreign Direct Investment Law (Law No. 4875, or “FDI Law”) to encourage FDI, protect the rights of foreign investors, and align definitions. Foreign investors are defined as “real persons” who possess a foreign nationality, meaning that refugees, whatever protection status they have, can be foreign investors and therefore fall within the scope of the law. The FDI Law does not distinguish between foreigners, refugees of all statuses, or Turkish citizens. Because of this, all multilateral and bilateral agreements also apply to refugee-owned businesses.

The FDI Law guarantees foreign investors the right to make free FDI in Türkiye and grants them the same rights as local investors. International investors are allowed to establish any form of the company set out in the Turkish Commercial Code, and the registration of companies can only be conducted by Trade Registry Offices that operate in the Chambers of Commerce, taking, on average, just one day. Foreigners may establish a Limited Liability Company with a minimum capital of 10,000 Turkish Liras (TL) (approximately \$1,400 USD) and an incorporated company with a minimum capital of 50,000 TL (approximately \$6,750 USD).

4.5 Promoting services and products targeted to refugees from Ukraine

The arrival of large numbers of FDPs changes the taste composition of consumers and represents a new market for local companies. Adaptive and flexible responses factor in the complexity of FDP situations and the dynamics of the interactions between the stakeholders engaged. Considering FDPs as new consumers and clients give access to new markets for the development of new services or products. While this has been seen in the provision of several integration support services by Polish and Ukrainian companies in Poland, more can be made.

Recommendation #10: Support local companies providing services or products for Ukrainian FDPs.

The Polish market has an opportunity to adapt to the needs of FDPs from Ukraine. In Poland, Ukrainian FDPs struggle with language skills. Multiple language schools could expand their repertoires to include Polish language classes and supplement potential efforts by local government and NGOs. Similarly, the childcare offer could be enhanced. Another opportunity to create new products and services targeting the Ukrainian FDPs could be digital training and website designing for local companies to promote their businesses and services. A granular study could be conducted to see what specific products and services could be developed in the Polish market and targeted to Ukrainian FDPs. Such a study would highlight those needs for the mutual benefits of both local companies providing these new services (e.g., housing search platforms, entrepreneurial matching platforms). To assure sustainability, the private sector, and NGOs should be supported with funding from the government which can rely on the existing logistics and expertise.

ANNEX A. ACTION PLAN

The Polish authorities could consider the following interventions in order to incentivize private sector-FDP linkages, secure their integration in the local economy and facilitate skill training.

Table 4. Summary of recommended action for Polish authorities to enhance the economic integration of FDPs from Ukraine

Responsible or Leading Entity	Actions: Social inclusion and support	Actions: Entrepreneurship	Actions: Investment	Actions: Employment	Actions: Products & Services
Government: Ministry of Interior		Recommendation #7: Support local governments in creating entrepreneurship and cultural integration centers.	Recommendation #1: Support NGOs by expanding assistance and facilitating visa and work permits for international experts.		
Government: Legal authorities	Recommendation #2: Amend the Act on Assistance to Ukrainian Refugees.				
Government: Ministry of Investment and Economic Development			Recommendation #8: Encourage investments to FDP-related businesses. Recommendation #9: Attract Ukrainian investors		Recommendation #10: Support investments and growth of companies providing services or products for Ukrainian FDPs.
Government: Ministry of Family, Labour and Social Policy				Recommendation #3: Enhance childcare offer	

Responsible or Leading Entity	Actions: Social inclusion and support	Actions: Entrepreneurship	Actions: Investment	Actions: Employment	Actions: Products & Services
Local and regional authorities		Recommendation #7: Create local entrepreneurship programs.		Recommendation #4: Create matching mechanisms between Ukrainian FDPs and employers.	
Other local actors (E.g. NGOs and CSOs)		Recommendation #7: Participate in the creation of local entrepreneurship programs.		Recommendation #3: Support Ukrainian FDPs with Polish language courses.	
Banking sector			Recommendation #8: Introduce a “FDP lens” when lending to Ukrainian FDPs; adopt FinTech solutions for FDPs.		Recommendation #10: Support local companies providing services or products for Ukrainian FDPs.
Polish companies	Recommendation #1: Provide social support to FDPs employees and prospective employees, e.g. training, childcare, etc.	Recommendation #6: Do business with Ukrainian companies in Poland and understand competitive advantages		Recommendation #4: Hire and train FDPs from Ukraine.	Recommendation #10: Develop new services or products for Ukrainian FDPs.
Investors (Polish or international)		Recommendation #5: Provide funds and seed capital for Ukrainian-owned businesses.	Recommendation #8: Introduce a “FDP lens” when investing in Ukrainian FDPs; invest in FinTech solutions.		Recommendation #10: Invest in companies providing services or products for Ukrainian FDPs.

Responsible or Leading Entity	Actions: Social inclusion and support	Actions: Entrepreneurship	Actions: Investment	Actions: Employment	Actions: Products & Services
<p>Business Associations</p> <p>(Chambers of Commerce, Confederations of employers, etc.)</p>		<p>Recommendation #5:</p> <p>Provide technical assistance to Ukrainian entrepreneurs.</p> <p>Recommendation #6:</p> <p>Connect business training programs to entrepreneurship peer-support and advice; create a bilingual platform for business matching; share FDPs' entrepreneurial success stories to combat negative stereotypes.</p>		<p>Recommendation #4:</p> <p>Guide local companies as to how to hire FDPs from Ukraine and what incentives exist.</p>	
<p>Development partners</p>		<p>Recommendation #5:</p> <p>Assist the government, NGOs, and private investors in establishing business incubators.</p>	<p>Recommendation #9:</p> <p>Conduct a study on the appetite of investors in supporting FDP-related businesses and test the investment appetite of outsourcing companies.</p>		<p>Recommendation #10:</p> <p>Conduct a study to see what specific products and services could be developed in the Polish market and targeted to Ukrainian FDPs and highlight needs for the mutual benefits of both.</p>

ANNEX B. THE PS4R CHARTER OF GOOD PRACTICES

ENTREPRENEURSHIP

To enable integration, self-reliance, contribution to market development, and economic growth through entrepreneurship, the private sector and policymakers should consider the following five principles:

1. INTEGRATION

Entrepreneurship is an important mechanism to advance economic integration.

- Refugee entrepreneurship programs should be customized to the local context but integrated, in a spirit of inclusion, into broader national-level and regional-level initiatives focused on entrepreneurship and SME development.
- Refugee entrepreneurs should be supported by host community entrepreneurship ecosystems, and refugee businesses ought to be integrated into local value chains to harness the potential of local investors.
- Apart from being a gateway to income and employment, entrepreneurship should foster the inclusion of both refugees and local communities, especially through actions of local authorities, to accelerate refugees' insertion by recognizing their contribution as actors of local development.
- Private partners should support and promote women's participation in refugee-driven and refugee-oriented businesses.

2. REGULATION

Entrepreneurship requires a clear, transparent, and non-discriminatory legal and regulatory environment, which enables host and refugee businesses to take off quickly and thrive in an inclusive and sustainable fashion.

- The regulatory framework for enterprise creation, registration, and operation needs to be designed in a non-discriminatory manner to ensure fair competition and decent jobs for both the forcibly displaced and host communities. This includes equal rights to access property, to trade, and to benefit from financial services, and equal freedom of movement.
- Refugee startup businesses and host entrepreneurs should have equal access to entrepreneurship support programs and self-employment schemes, regardless of whether these are offered as part of the broad pre-existing entrepreneurship ecosystem or if the refugee influx prompted them.
- Refugees and host entrepreneurs should be able to use digitally authenticated identification to prove identity, open bank accounts, sign contracts, register new businesses, or otherwise facilitate administrative and business procedures.
- Sensitization, outreach, and awareness campaigns should be deployed to ensure that displaced persons and host populations alike (including refugee entrepreneurs, host businesses, and counterparts such as banks, institutions, employers, and customers) gain equal knowledge of relevant business-related and

refugee-related laws and regulations, and for rules to be applied transparently and equally for the benefit of all.

3. CAPACITY BUILDING

Entrepreneurship support programs including newcomers and local entrepreneurs can help close education and skills gaps and address adaptive challenges.

- Entrepreneurship and business training should be adapted in duration, style, type of instructors, and techniques to acknowledge differences in culture, regulations, language, or competencies and maximize skills transfer and an understanding of the local (host) context.
- Capacity building should provide continuous capability enhancement and make support available at all stages of the entrepreneurial process.
- Entrepreneurship programs should create spaces & platforms to share and align best practices and evaluation frameworks. They should mobilize peer-to-peer support from groups and individuals to evaluate newcomer competencies and experience.
- Entrepreneurship practitioners should leverage technology to deliver capacity-building activities at a large scale, using existing high-quality content and thus gaining in financial and operational efficiency, while facilitating inclusivity and accessibility for wider impact.
- Capacity building ought to help enhance the visibility of entrepreneurial success stories to help deconstruct negative stereotypes in communities and contribute to changing the narrative on refugee entrepreneurship.

4. FINANCING

Refugee-driven and refugee-oriented startups and enterprises require greater access to and promotion among private financiers.

- Financing of refugee entrepreneurs' ventures should adopt a more flexible approach when it comes to financing instruments – such as micro-credits, credit guarantees, or community-based financing and impact-investing programs.
- Financiers of refugee ventures ought to relax and/or adapt their requirements for credentials, including documentation, credit rating, and seed funding.
- Financial institutions and private funds should be encouraged and supported by governments and multilateral development banks, and development finance institutions to provide the financing needed by refugee entrepreneurs.
- Financial products and service offerings that include the forcibly displaced persons ought to receive additional support from the public sector to help crowd in on private partners.

5. NETWORKING

Networks of diverse support partners and functions facilitate business creation and contribution to the economic growth of forcibly displaced people and host communities.

- Entrepreneurship programs should create relevant and effective linkages to the host community, government-affiliated organizations, corporate partners, NGOs, financing institutions and intermediaries, and diaspora support networks.
- Public-private dialogue can be useful for gathering sector partners and helping collaboratively discover and solve constraints and opportunities.
- Matchmaking schemes, online e-commerce, and transaction platforms or sectoral promotion approaches are essential to building up refugee-related entrepreneurship as an important part of the business-to-business ecosystem.
- Local business associations should be encouraged to reach out to refugee communities and customize programs/discounts/networks to integrate new companies into their organizations.

INVESTMENT

The private sector should promote and deploy investments that enhance the economic integration of refugees, enable inclusive growth of host economies, and benefit investors and target beneficiaries in the following five principles:

6. ADDITIONALITY

Refugee-related investment contributes complementary to what is available in the market and crowds in on the private sector.

- Ideally, investments ought to provide both financial and non-financial additionality in terms of (innovative) financing structures, resource mobilization, risk sharing, policy, and regulatory change, standard-setting, and knowledge-sharing.
- Investments should enhance opportunities for the host community and the forcibly displaced.
- Investors should attempt to channel refugee-related funds through local financial institutions before they consider building new mechanisms with additional intermediaries and resources.
- Alternative or new mechanisms are warranted when a lack of flexibility, speed, or competency prevents the mobilization of assets for deployment to the target recipients.

7. RESILIENCE

Investments contribute to the host economy's resilience, long-term viability, and growth potential through market development to counter shocks, including those caused by forced displacement.

- Investing in alignment with the host countries' priorities and boosting resilience is fundamental to the

economic integration of refugees and social cohesion with host communities.

- Investors should prioritize sectors most likely to be impacted by a high influx of refugees, such as basic services and climate adaptation.
- The private sector ought to partner with public investors, civil society organizations, and refugee communities to increase the marketability of the host economy and drive its growth through investments in competitive sectors, business-to-business matchmaking, and integration into global value chains.
- Investors should acknowledge vulnerability factors and support targeted measures such as insurance schemes and innovative technology solutions to address those to enhance the resilience of refugees and host communities.
- Investments in resilience require an evidence-based approach, as it is vital to carefully assess market failures and investment gaps and couple investments with adequate technical assistance and capacity building.

8. INCLUSION

Investment in furthering the economic integration of refugees supports financial and social inclusion and benefits both the forcibly displaced and host communities.

- The private sector should prioritize investment and financial offerings targeting inclusive businesses that expand access to goods, services, and livelihood opportunities on a commercially viable basis to people at the Base of the Pyramid (BoP), be they refugees or members of the host communities.
- Investment ought to promote diversity and offer solutions that help reduce compounded inequality and remove barriers related to gender, disability, and other vulnerabilities that hamper financial and social inclusion.
- Investment should be designed to extend services to the unbanked and to enable the formalization of informal businesses, which cannot access investment outside of the world of microfinance.
- The private sector ought to base its investment strategy upon a consultative process with relevant stakeholders (inclusive of civil society, labor market partners, target beneficiaries, and policymakers) in the host communities.

9. INSTRUMENTS

Solutions for investment, banking, and access to finance for refugees and host communities are flexible and agile in order to respond and adapt adequately to the increased demand and risks inherent to a refugee-affected market configuration.

- Policymakers should seek to create an enabling environment for a variety of funding mechanisms by the public and private sectors, including several financial instruments deployed for various return horizons and risk appetites, depending on the needs of the market linked to the situation at hand, including recovery, stabilization, and restoration.

- Cooperation between various actors (public–private) is necessary to promote blended finance solutions to red investments.
- Instruments ought to be designed with an ambition to collect private finance.
- Innovative financing solutions, including development impact or sustainability awareness bonds and outcome-based instruments, should be sought and promoted.
- Financing instruments should be perceived as part of a larger toolkit and ensure that refugees seeking financing can access the mainstream financial actors and intermediaries.

10. IMPACT

Refugee-related finance and investment delivers long-term impact and is profitable and sustainable for target beneficiaries, investees, and investors alike.

- As the global appetite for impact investment is as high as US\$ 26 trillion, the focus should be on how to best measure and track intentional impact via appropriate indicators.
- Capital result frameworks should be linked with those of internationally recognized targets and standards for impact, such as the Sustainable Development Goals (SDGs), the Global Compact for Refugees, etc., to avoid “impact washing.”
- Impact ought to be monitored consistently on an ongoing basis to identify and share lessons learned that emerge and develop through your investment cycle.
- It is recommended that a migrant/refugee lens with clear sets of criteria is applied to capture investments’ economic and social impact on both host communities and refugees.
- Investors should complement traditional investment analyses with specific analytics to better understand risks related to investments in/by refugee-owned or refugee-oriented businesses. For example, productivity and debt repayment risks may not be higher than under comparable non-refugee circumstances.

EMPLOYMENT

When considering refugee employment, businesses and their representative organizations should advocate for and consider the following five principles:

11. ACCESS

Refugee talent has equitable access to larger societal structures, institutions, and resources.

- Social partners and international organizations should work towards raising awareness among policymakers and host communities of the contribution that refugees could make when entering the labor market.
- Refugees should be able to access information to learn about their rights to work and the possibility of joining bridging employability programs from day one.

- To minimize the loss of competencies and motivation, refugees should be able to undergo skills mapping, upgrade skills, and perform temporary jobs while their refugee status is under clarification.
- To ensure alignment and complementarity of support programs, employers and their representative organizations should work closely with local employment services, integration support providers, and development partners.

12. LEGAL FRAMEWORK

The legal framework for employment guarantees refugees' freedom of movement, their right to work and to receive training, to decrease their reliance on aid, and help the economy of the host country tap the full potential of their skills and consumption.

- The legal framework needs to be clear, predictable, comprehensive, and coherent to create incentives for companies to hire and invest in skills upgrades for refugees.
- Social partners, i.e., employer's representative organizations and trade unions, should advocate reducing the legal uncertainty and bureaucratic burden that currently hampers the employment of refugees.
- Social partners need to engage in public-private dialogue with host governments on the economic integration of refugees.
- Host countries need to seek ways to facilitate access to regional labor markets, especially in neighboring countries and/or markets with many migrant workers.

13. INTERMEDIATION

As social partners, the employers' representative organizations, government, and trade unions play a unique intermediary role in the economic integration of refugees.

- The government should facilitate social dialogue with employers and trade unions on employment opportunities for decent work for refugees per ILO Conventions.
- The employers' representative organizations and trade unions should promote and raise awareness among their members on the possibilities and advantages of allowing refugees to enter the labor market.
- The employer's representative organizations and trade unions ought to help create opportunities for in-work training for refugees and participate in the design and organization of vocational training modules.
- Trade unions and business associations have an instrumental role to play in matching the skills available in the refugee and host labor pool with demand from employers.
- The social partners should help facilitate the recognition of certifications required for technical and professional trades.

14. SKILLS

Foreign qualifications and skills are assessed, recognized, and leveled swiftly, efficiently, and in an equitable manner.

- It is imperative to conduct a skills gap analysis to enable long-term evidence-based planning to meet the actual and future needs in the labor market on the private-sector side.
- Matchmaking of aspirations and jobs, soft skills training, mentoring, and coaching to provide orientation and sustain motivation need to be available to refugees to pave the way to satisfactory/promising employment. Employers ought to consider the use of prior learning in developing bridging programs.
- Initial and continuous training, including language, should respond to labor market needs and be provided by qualified, dedicated institutions equipped with relevant facilities and curricula.
- In the absence of official certificates and with respect to different recognition systems, it is recommended to develop an approach to assess, validate and certify previously acquired qualifications and skills levels. Employers should, where there is no documentary proof of qualifications, consider ad hoc assessment methods.
- To enhance long-term prospects for highly skilled governments, municipalities, job centers, and social partners should enable refugees with these skill sets to resume their original career pathways.

15. SOCIALIZATION

Successful integration of refugees depends on insertion programs based on the local context.

- Programs addressing challenges such as transport, childcare, and language adaptation are paramount to the integration of refugees into the work environment.
- Employers and relevant government entities should design programs catering to refugees who may suffer from mental stress and physical health issues to detect such issues quickly and offer support measures.
- The refugee dimension should be incorporated into diversity management tools for the workplace, aiming to enhance inclusion towards cultural diversity and gender balance.
- Anti-racism and anti-xenophobia sensitization campaigns for the host country workforce and local communities should seek to fight racist and xenophobic attitudes, alleviate social tensions and reduce hostility in the workplace. Conflict-resolution mechanisms ought to be envisaged in case tensions arise.
- Employers should support efforts to overcome discriminatory attitudes in the workplace and among employers in supply chains and to enhance understanding and appreciation in teams and between refugee employees and managers.

PRODUCTS & SERVICES

When exploring, developing, and implementing business models that support or include refugees, the private sector should consider the following five principles:

16. ADAPTATION

Adaptive and flexible responses factor in the complexity of refugee situations and the dynamics of the interactions between the stakeholders engaged.

- Solutions should be designed based on the realities of displacement and with the understanding that refugees are unique clients. There is no one-size-fits-all, and service delivery models require significant tailoring to the local context.
- Businesses should cultivate a willingness to test, learn and adapt based on client feedback and changing contexts on an ongoing basis and beyond crises.
- Service and product providers should acknowledge trade-offs between the speed of delivery and long-term relevance and impact.
- Multi-sectoral approaches are required to improve the user experience and enable infrastructure and service delivery that contribute to inclusive growth.

17. SUSTAINABILITY & ACCOUNTABILITY

Services and products are economically and environmentally viable, 'do no harm,' and actively seek to deliver positive social impacts for refugees.

- Services and products should be market-based beyond "refugees as customers" only but inclusive of refugees as customers and consumers.
- Services and products should be designed with a vision for long-term economic viability beyond a particular crisis response scheme.
- Products and services should be designed in collaboration with refugees to best speak to their needs as customers and consumers in the light of context-specific cultural, social, and legal realities.
- Product and service design needs to consider the environmental and social impact and avoid aggravating negative impacts, especially those that could perpetuate displacement.
- Services and products should be sourced locally as much as possible to maximize relevance and environmental sustainability.

18. PARTNERSHIPS

Private groups and business affiliates, non-profit organizations, development institutions, and government institutions create and sustain a level playing field for partnerships to deliver products and services to refugees.

- Local authorities, structures, and actors should be integral partners in the design and delivery of products and services to refugees from the outset.
- Risks need to be shared equitably between partners to create mutual interdependence and accountability.
- Successful partnerships require complementary competencies and upstream coordination.
- Stakeholders should identify existing locally proven business models and forge partnerships with them in the refugee space.
- Partnerships should help ensure that products and services for refugees are the best fit for purpose and value for money.

19. MARKETABILITY

Commercial viability is a prerequisite to sustaining and scaling a business that provides services and products to refugees.

- Financial modeling that accurately projects a break-even point is essential in the development of new business cases.
- In the startup phase, there is a need for prolonged soft funding opportunities as refugee-oriented services and products can take several years to transition from subsidized provision to breaking even on market terms.
- Financing for product and service providers should combine non-profit and profit elements and consider blending grants with commercial revolving instruments.
- Financiers ought to identify and create a marketplace for alternative revenue stream opportunities, such as carbon credits, water credits, etc.
- UNHCR needs to harness its convening power to connect financiers with service and product providers.

20. COMMUNICATION

The provision of adapted services and products that target refugees is communicated openly and carefully to/by all stakeholders (including refugees) to minimize risks and enhance internal and external support.

- Open, structured, and coordinated communication channels should be established to help address weaknesses and challenges faced by the private sector and refugees and to share data and knowledge.
- A coordinated message, vision, and approach can facilitate policy dialogue with the host governments to improve the market-enabling environment and remove systemic obstacles that hamper investments.
- Language matters, and businesses addressing refugee integration through their products and services should not hesitate to speak “differently” in the spirit of respect for diversity and inclusion. Business model canvas terms should be adapted to recognize the social dimensions of the refugee market: Customer Segments could be changed to Beneficiaries; Cost Structure to Mission Cost/Budget; Channel to Deployment; Customer Relationships to Buy-in/Support.

ENDNOTES

- 1 The Charter was drafted as part of the World Bank PS4R project (previously called RIMP – Refugee Investment Matchmaking Platform), after consultations with more than 200 stakeholders from the public, private, and development sphere, and in strong collaboration with PS4R’s founding partners: the International Chamber of Commerce (ICC), European Investment Bank (EIB), the UN Refugee Agency (UNHCR), and the Confederation of Danish Industry (DI). To learn more about PS4R, visit <https://www.worldbank.org/ps4r>
- 2 Article 2, paragraph 3, of the Act on Assistance to Ukrainian Citizens in connection with an armed conflict in the territory of that state, as amended, hereinafter referred to “Act on Assistance to Ukrainian Citizens”. Those third country nationals who are spouses of Ukrainian citizens would fall under Article 1, as described in footnote 2.
- 3 Other limitations for this simplified procedure include that the work cannot be seasonal work, the entire period of employment cannot exceed 24 months, the employee cannot sit on the management board of the employer and the remuneration is not higher than other employees at the comparable jobs.
- 4 Source: UNHCR.
- 5 Polish Government Website, www.dane.gov and https://www.nbp.pl/en/publikacje/raport_inflacja/iraport_july2022.pdf?w=1
- 6 M. Feierstein, K. Winfield, The Experience of Venezuelan Refugees in Colombia And Peru And How The Business Community Can Help, 2019
- 7 Connor 2018; Jeannet et al. 2021; McLaren 2015
- 8 See www.wzajemniepotrzebni.pl.
- 9 World Bank, Jordan: Improving Women Economic Opportunities: Select Entry Points for Policy Dialogue and Operational Interventions, June 2021
- 10 Centre For Entrepreneurs, Global Refugee Entrepreneurship Survey, 2019
- 11 Mateusz Walczyk, Vestbee, 2020.
- 12 Ustawa z dnia 13 czerwca 2003 r. o zatrudnieniu socjalnym (art. 1 para. 7 uchodźców realizujących indywidualny program integracji, w rozumieniu przepisów o pomocy społecznej,
- 13 Ustawa z dnia 13 czerwca 2003 r. o udzielaniu cudzoziemcom ochrony na terytorium Rzeczypospolitej Polskiej
- 14 Ustawa z dnia 8 października 2004 r. o ratyfikacji Europejskiego porozumienia o przekazywaniu odpowiedzialności za uchodźców, sporządzonego w Strasburgu dnia 16 października 1980 r.
- 15 Organ administracji publicznej rozpatrujący odwołania od decyzji i zażalenia na postanowienia wydane przez Szefa Urzędu do Spraw Cudzoziemców w sprawach o nadanie lub pozbawienie statusu uchodźcy lub udzielenie ochrony uzupełniającej. Rada jest także organem właściwym w sprawach wznowienia postępowania, uchylecia, zmiany lub stwierdzenia nieważności wydanych przez siebie decyzji lub postanowień. www.isap.sejm.gov
- 16 Umowa między Rzeczpospolitą Polską a Ukrainą o zabezpieczeniu społecznym, sporządzona w Kijowie dnia 18 maja 2012 r.
- 17 (Umowa między Rządem Rzeczypospolitej Polskiej a Gabinetem Ministrów Ukrainy o wzajemnym uznawaniu akademickim dokumentów o wykształceniu i równoważności stopni, sporządzona w Warszawie dnia 11 kwietnia 2005 r.
- 18 Ustawa z dnia 12 marca 2022 r. o pomocy obywatelom Ukrainy w związku z konfliktem zbrojnym na terytorium tego państwa)
- 19 Rozporządzenie Ministra Edukacji i Nauki z dnia 21 marca 2022 r. w sprawie organizacji kształcenia, wychowania i opieki dzieci i młodzieży będących obywatelami Ukrainy
- 20 ROZPORZĄDZENIE RADY MINISTRÓW z dnia 1 kwietnia 2022 r. w sprawie ustanowienia Pełnomocnika Rządu do spraw uchodźców wojennych z Ukrainy
- 21 Rozporządzenie Rady Ministrów z dnia 4 maja 2022 r. w sprawie maksymalnej wysokości świadczenia pieniężnego przysługującego z tytułu zapewnienia zakwaterowania i wyżywienia obywatelom Ukrainy oraz warunków przyznawania tego świadczenia i przedłużania jego wypłaty www.isap.sejm.gov
- 22 Rozporządzenie Ministra Edukacji i Nauki z dnia 13 maja 2022 r. zmieniające rozporządzenie w sprawie organizacji kształcenia, wychowania i opieki dzieci i młodzieży będących obywatelami Ukrainy
- 23 Komunikat Ministra Cyfryzacji z dnia 23 maja 2022 r. w sprawie określenia terminu wdrożenia rozwiązań technicznych umożliwiających prowadzenie bazy danych, o której mowa w art. 13a ust. 1 ustawy z dnia 12 marca 2022 r. o pomocy obywatelom Ukrainy w związku z konfliktem zbrojnym na terytorium tego państwa www.isap.sejm.gov
- 24 Pełnomocnik Rządu do spraw uchodźców wojennych z Ukrainy – Rozporządzenie z dnia 1 kwietnia, 2022r.
- 25 These funds are intended for the benefit of crime victims who cross the border between Ukraine and the Republic of Poland. It is possible to purchase hygiene, children’s, food and megal products from the

Justice Fund. Leaflets informing about free and ad hoc support from the Justice Fund for people suffering from armed aggression in Ukraine were also prepared in Ukrainian. Currently, there are 305 centers providing assistance, located all over Poland. The Justice Fund has extended the working time of consultants serving beneficiaries in Ukrainian, who are now available 24 hours a day.

26 A new mobile application provided an opportunity to automatically check the data of applicants and citizens of Ukraine that receive assistance. Registration in the database is intended to prevent multiple cash benefits (for the same period) by the same person with multiple addresses. The database, which includes the personal PESEL numbers of the beneficiaries, automatically checks the correctness of personal data and, in general, whether the person specified in the request for cash benefits is not fictitious. This helps in the work of local governments, and the database forms a platform with information from all over Poland. It automatically checks for what period and at what address the citizens of Ukraine were received. Thanks to this system, the entire process of supporting the citizens of Ukraine can be properly monitored. Thousands of Ukrainians have left Poland but keep collecting this monthly allowance, to which they are not entitled once they leave the country, as a person who leaves Poland for more than 30 days loses special protection status granted to Ukrainian refugees. This rule may cause a problem in cases when a Ukrainian citizen went back to their country to take care of urgent matters and still needs to come back to Poland.

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the partnership can facilitate the role of business in providing practical solutions to support and empower refugees to become positive contributors to host economies.

86 PULSE Report.

87 Krajowa Izba Gospodarcza

88 Konfederacja Pracodawców Polskich Lewiatan

89 A business is FDP-related when it (i) employs FDPs; (ii) is owned by a FDP; (iii) provides services or goods for FDPs or is linked to displacement flows within the host community; (iv) allows the development of sectors that will ultimately result in enhanced downstream economic opportunities and integration of by FDPs; or (v) is located in tense geographic areas due to displacement flow, with a view to alleviate these tensions.

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