

# QUARTERLY REPORT

July - September 2025

Startpunt, as part of the Policy and Support team of Vluchtelingenwerk Vlaanderen provides **socio-legal information to applicants for international protection on their arrival in Belgium**. The team is present on a daily basis at the registration centre (Belliardstraat 68) and at the building of the Immigration Office (IO) where interviews are organised (Cube - Pachecolaan 44). At both locations the team gives advice and information on the procedure and refers to other social and legal services if needed. At the Legal Helpdesk (LHD), Startpunt, in collaboration with the Brussels Bar Association, provides information to applicants three times a week and facilitates access to legal aid. The team consists mostly of volunteers who speak a wide variety of languages. Startpunt monitors the situation on the ground and gathers **signals** which serve as a basis for the policy work of Vluchtelingenwerk.

This report is based on observations by Startpunt during the third quarter of this year and aims to highlight their work, describe the situation in the field, and outline the challenges faced by applicants of international protection.

## KEY NUMBERS



Startpunt gave advice and referral to legal assistance and social services to around **2800** people at the **registration centre**, primarily single men, and around **730** men, women and family at the **Cube**<sup>1</sup>



The **Legal Helpdesk** received a total of **1024 Visits**:  
628 first-time visits + 412 came to follow up on their case



At the **stage of the interview** with the IO, **48.8%** of people Startpunt talked to had **access to a lawyer**.  
**55.5%** of applicants coming to the **LHD** got **access to a lawyer within the first month of their application**



Of the 324 people whose reception needs Startpunt recorded **at the LHD**, **66.7% were homeless**  
Of the 730 people whose reception needs Startpunt recorded **at the IO**, **16% were homeless**



Top 3 nationalities of **visitors at the LHD**: 24.8% Afghans; 14.4% Eritrea; 10.5% Palestine  
Top 3 nationalities of **applicants for IP**: 11% Afghans; 10% Eritrea; 9.5% Palestinians

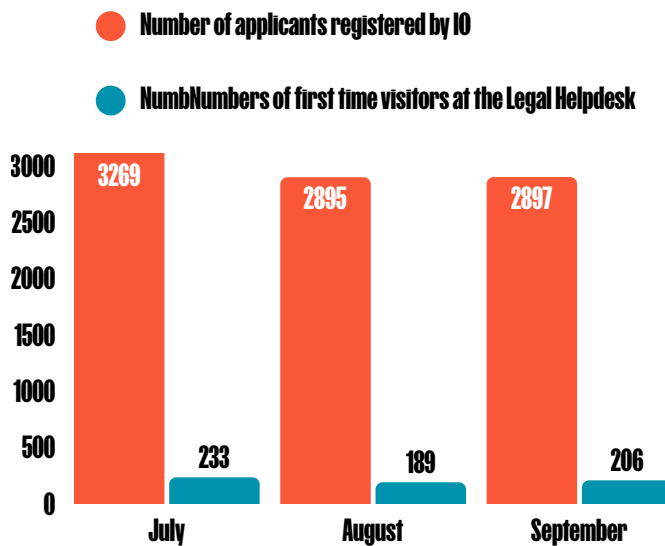


**28 volunteers** joined the Startpunt activities speaking **17 languages** (English, Dari/Farsi, Pashto, Urdu/Hindi, Spanish, Punjab, Arabic, Kurdish, Turkish, Dutch, French, German, Tigrinya, Amharic, Russian, Bulgarian, Italian, Chechen)

[1] The recording of data at the IO at Cube is not comprehensive

[2] As of 22 July 2025

### Overview of numbers at the IO and the LHD



**7% of the number of applicants who registered at the IO found their way to the LHD**

## OBSERVATIONS AT THE REGISTRATION CENTRE

Throughout the third quarter of the year, Startpunt continued to observe a **relative decline in the number** of people queuing in the morning to register for **international protection**. Most registrations took place on Mondays, with the highest number—289 applicants—recorded on Monday, September 22nd. While this decline aligns with the official statistics provided by the CGRS, in contrast to the second quarter, **the third quarter showed an overall higher number of registrations**, 9,061 between July and September, compared to 8,334 recorded between April and June.<sup>3</sup>

## POLICE PRESENCE

Police presence continues to follow the same trend as in the first quarter of the year - **reduced presence**, which then only includes quick check-ins with the IO staff. Within the third quarter of this year, the police were present three times, in September.

[3] Asylum statistics September 2025 | CGVS, p. 2.

### REGISTRATION CAPACITY

If the number of applicants exceeds the registration capacity of the IO (for which there is no officially communicated number), appointments are given, inviting applicants to come back on the same day or one of the following days. Within the third quarter, Startpunt witnessed appointments being given on six different occasions. These were the days with the highest numbers of applicants counted in line to register, namely the 7<sup>th</sup> and 28<sup>th</sup> of July, the 11<sup>th</sup> and 12<sup>th</sup> of August, and the 15<sup>th</sup> and 22<sup>nd</sup> of September. On all **six days**, the number of people counted by Startpunt exceeded 225. Notably, the highest number of applicants that were admitted before appointments were given was **289**. Overall, **166 appointments** were given **within the legal timeframe of 10 working days**,<sup>4</sup> and all of them were for the same day at 1 pm. We have thus observed a decrease in the number of appointments given compared to the second quarter of 2025 (166 compared to 287 of the previous quarter). The practice of giving appointments beyond the legal timeframe of 10 working days has not been observed by Startpunt since early January of this year.

### PROCEDURES

During the third quarter, Startpunt observed that people queuing in the **family** line were often **questioned at the entrance before being allowed to enter** and, as a result, tended to wait longer outside compared to single men. Similar situations had already been noted in the previous quarter. In some cases, families were asked to wait until the doors reopened later in the day.<sup>5</sup> When the team approached these families, they shared that they waited for a family member to be there for the family reunion procedure. Startpunt also observed that when parents came to register a child, whether born in Belgium or abroad during an ongoing procedure, both parents were expected to be present. When this was not the case, families either waited outside until the other parent arrived or were asked to return another day. These observations are based on what the Startpunt team witnessed on site and do not reflect confirmed procedures or explanations provided by the authorities.

### MOVE OF THE TEMPORARY PROTECTION REGISTRATION OFFICE

In August, the registration office for people applying for Temporary Protection (TP) was relocated to **Belliardstraat 68**, where people applying for asylum normally present themselves. This change created additional challenges in organising the queues. On the first day, TP applicants were placed behind the single men's line and admitted after the first group of asylum applicants, using the same entrance. Several applicants joined the wrong queue, requiring redirection by Startpunt. Throughout August, similar situations persisted. Although a separate TP entrance was later introduced behind the single men's line, queues frequently extended and merged at the entrance on busy mornings, making it difficult for applicants to identify where to wait.

[4] In accordance with Article 50, §2 of the Aliens Act a person's request to apply for international protection has to be registered within the three working days following the request. In case of a large number of people applying simultaneously rendering the three days difficult to meet in practice, the deadline of three days can be extended to ten working days.

[5] Based on information received from the IO staff at the registration centre: After closing at 8:45, the centre reopens hourly to check for waiting applicants, prioritising families and vulnerable individuals while asking single men to return the next day.

The relocation not only presented a challenge to the Startpunt team but also to the IO staff as no additional coordination staff was allocated with the move of the TP registration centre. During the first weeks, before a more structured system was put in place, asylum applicants sometimes waited for long periods while staff determined how to coordinate entries, and the overall flow of applicants remained uncertain.

A notable shift concerned access to the queue for **people with vulnerabilities**. Before the move, when the registration centre for Temporary Protection (TP) was located in the same building as the Commissioner General for Refugees and Stateless Persons (CGRS), next to the Brussel-Zuid station, TP applicants stood in separate lines depending on whether they were considered vulnerable or not.

*“Previously, priority was granted to families with children, people with disabilities, the elderly, and children without parental care. Now, there is only one line for everyone, without priority. Only unaccompanied minors are separately taken out of the queue.” (Olena, field and policy worker of Vluchtelingenwerk)*

Towards the end of August and beginning of September, a new admission system was introduced: part of the single men’s group entered first, followed by families, then TP applicants, and finally single men again. Throughout the third quarter, Startpunt observed that only around 30–35 TP applicants from the morning line were admitted inside, while the others received an appointment later the same day or on a following day. While this system created a more predictable rhythm and allowed Startpunt more time to speak with each group, limited space, the inconsistent presence of metal barriers after the road works, and the low visibility of the main entrance continued to cause confusion and required frequent redirection by the Startpunt team.

### ACCESSIBILITY

Startpunt continues to observe recurring issues related to the **safety and accessibility** of the registration centre. The **entrance** remains **poorly visible**, and applicants regularly walk past the building before being redirected by the Startpunt team. The **bike lane** adjacent to the queuing area continues to pose safety and organisational challenges, as applicants’ awareness remains limited and cyclists generally do not slow down. In July and August, **road works** temporarily closed the bike lane while bicycles and scooters continued to pass through the area. Combined with the relocation of the Temporary Protection registration centre and the resulting increase in applicants, this led to **intensified confusion** and **frequent redirection**. The road works also added noise and further disorientation around the different lines. After completion, the metal barriers used to structure the queues were only reinstalled in September and not consistently, which continued to affect the orderly formation of lines and occasionally resulted in **crowding at the entrance**.

Access to **sanitary facilities** remains a significant concern. This has been the norm for people applying for asylum; **no toilets are available** for applicants waiting outside the registration centre, and access to facilities is only possible once inside. The registration centre is located in a **business district**, where there are very few cafés or public facilities nearby. As a result, individuals waiting outside who need to use a toilet must walk several minutes to find an alternative. For people applying for Temporary Protection, this represented a notable change, as toilets were available at the previous registration location.

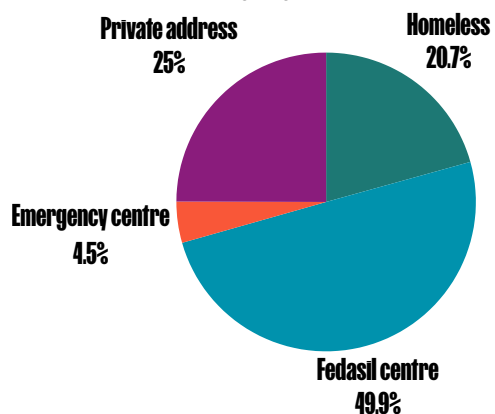
*“The lack of toilets particularly affects families with children, older people and people with health conditions.” (Olena, field and policy worker of Vluchtelingenwerk)*

### OBSERVATIONS AT THE IMMIGRATION OFFICE

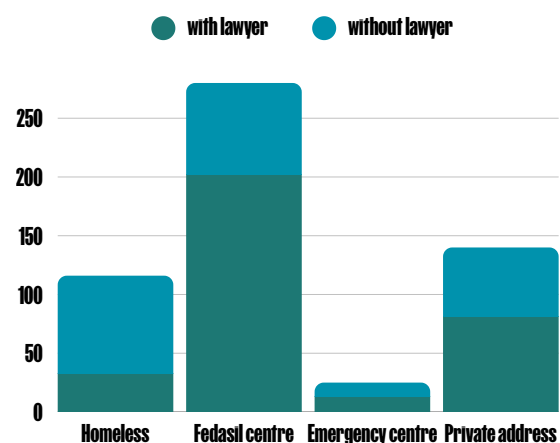
In total, the team recorded the data of 730 cases (which include single men, women, and families). Of those cases, 373 were for the first interview, 61 were for the interview for the Subsequent procedure, 127 were Dublin cases, 27 cases were recorded for M-status interviews, 1 interview for Temporary Protection, and 2 ICAM coaching appointments.

Generally, the gate at the Cube **opens** mostly around **8:30**, and those who have an appointment at 9am (possibly 9:30) are let in. Those with later appointments have to wait outside until approximately 30 minutes before their appointment. Regularly, Startpunt encountered people who want to extend their annexe when it has expired or correct a mistake in their annexe, not knowing they need an appointment for it. Similarly, the team observed a tendency of social assistant to send people to the Cube to register their child, and the team redirects them to Belliard or the commune, depending on the situation.

**Housing situation of applicants at the stage of 10 interview**



**Correlation between reception and access to a lawyer**



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At the stage of the interview with the IO **27%** of the applicants Startpunt spoke to had a place in a **Fedasil centre and access to a lawyer**. However, for those outside of the reception network and without a private address, access to a lawyer remains an exception (only 28.5% of homeless applicants have a lawyer). The presence of the team is especially important for the people who fall into this group, as Startpunt is able to direct them to the **legal helpdesk**, so a lawyer can be assigned to them, and to other humanitarian services, like the **Humanitarian HUB**, where they are provided with clothing, food and the option for shelter.



**116** referrals to the  
**Registration centre**



**3** referrals to **CGRS**  
for the big interview

### TRENDS AT THE LEGAL HELPDESK

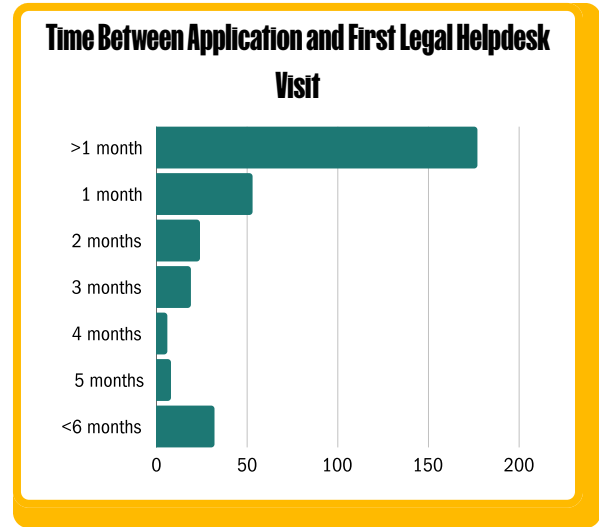
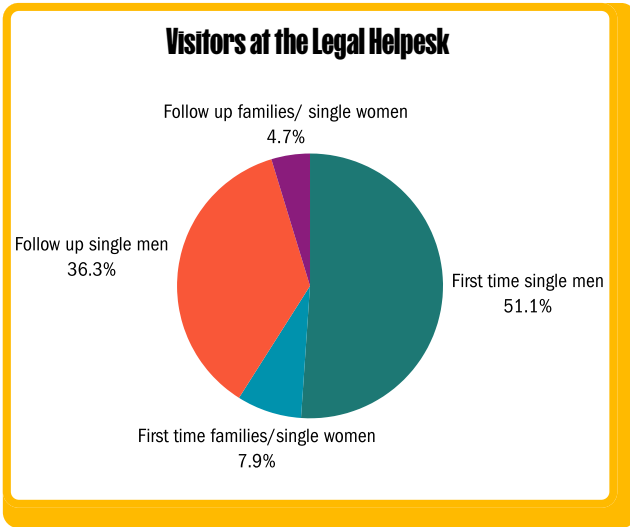
Between July and September the number of visitors at the Legal Helpdesk showed a slight increase compared to the number of visitor of the second quarter of the year - The team was able to reach 67 more people. On average the LHD had **27 visitors per shift**, with a peak of 49 visitors on July 16th.

Legal Helpdesk – 3rd Quarter 2025					
Month	First time		Follow-up		Total
	Single men	Families & women	Single men	Families & women	
July	202	31	112	16	361
August	165	24	121	14	327
September	177	29	129	20	355
<b>Total</b>	<b>544</b>	<b>84</b>	<b>387</b>	<b>50</b>	<b>1043*</b>

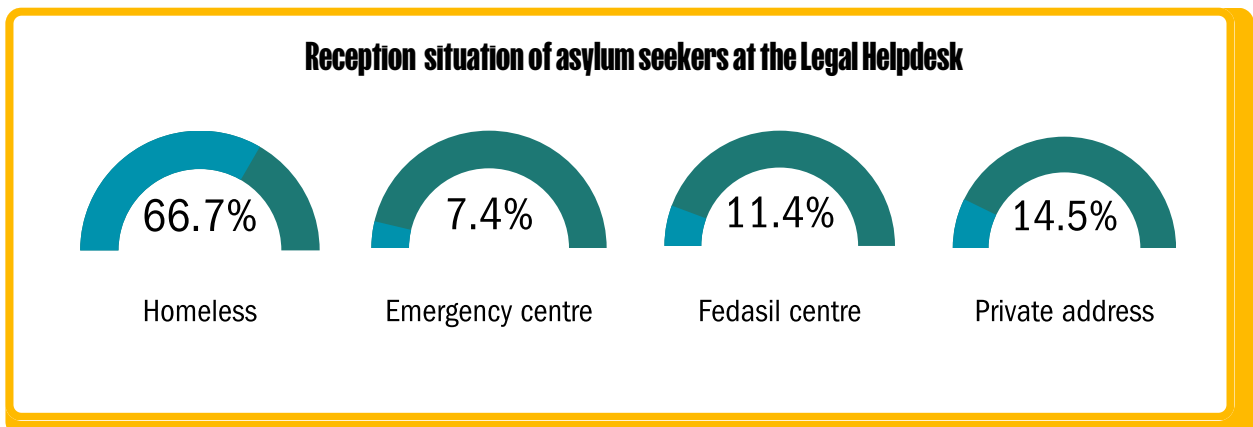
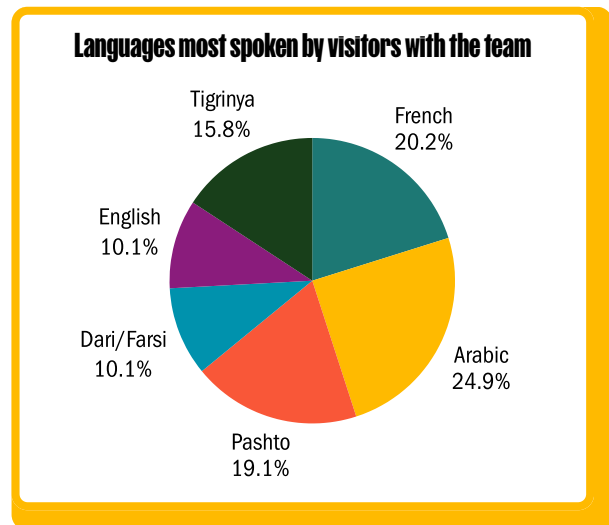
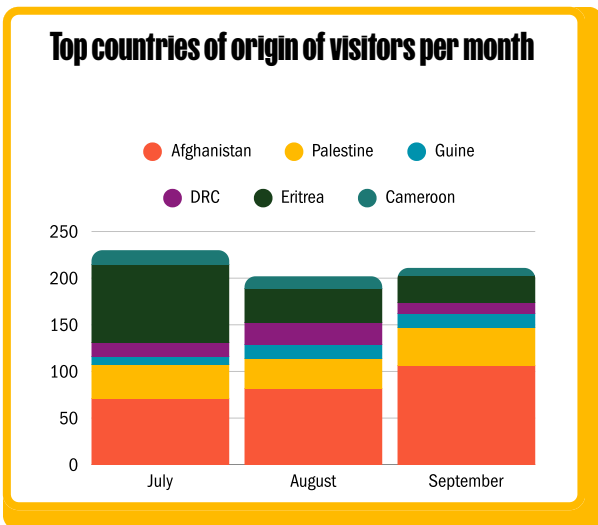
\* The Legal Helpdesk was closed on the 11/07, 22/07, and 15/08

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The team was able to reach the greatest share of people within the first month after their registration, ensuring timely access to legal advice and a lawyer.



**Reception** continues to be a problem for a majority of the applicants visiting the LHD. While in the second quarter of the month, the waiting time for the Fedasil waiting list was reduced to 2 months, during the third quarter, the **waiting time for single men increased again to 4 months** from the day of application. Many applicants coming to the LHD are unaware of the Fedasil waiting list; thus, the team helps them to register. Overall, Startpunt continues to assist people to find temporary solutions, for instance by directing them or registering them directly with Samusocial. However, registering with Samusocial remains challenging for individuals who do not have a phone or SIM card.

### M-Status

On **4th August**, the federal government introduced new legislation allowing Fedasil to refuse reception to first-time applicants who have already received protection in another EU Member State (**M-status**).

For families, this means that after registering their asylum application, they must undergo a **vulnerability screening** at Klein Kasteeltje. Only those assessed as sufficiently vulnerable are granted accommodation; others receive an individually motivated refusal of reception based on their M-status. In practice, **the vulnerability threshold is very high**, and having minor children alone is not considered sufficient. As a result, families with children are frequently refused accommodation.

Single men are refused reception directly at the Immigration Office, based on the assessment that they do not belong to a vulnerable group. They are subsequently removed from the Fedasil waiting list and informed that they have no right to reception due to their M-status. Most applicants with M-status have previously received international protection in **Greece**, where access to documentation and socio-economic rights for beneficiaries of international protection is known to be limited or difficult. This situation exposes them to homelessness and severe material deprivation, potentially undermining their right to a dignified life.<sup>6</sup>

On **13th August**, the first family with M-status approached the LHD. This family, consisting of ten members, including five minors, had previously received protection in Greece and had spent several weeks living on the streets. Similar difficulties were observed for an Afghan family of five, including three young children aged four, three, and two, one of whom had medical needs. These cases are representative of a broader pattern observed by the team.

***“It is hard to witness the difficult conditions the families are in. I met two Afghan families, one of them cried in front of me, which made me very emotional.” (Ahmad, Startpunt Volunteer)***

In response, the LHD team attempted to find **temporary housing solutions** for families with M-status, including through host families and, as part of a political action, in the Béguinage church. However, for multiple persons with M-status, including families with children, no emergency housing could be found, resulting in the fact that many of them found themselves living in the street - often in the parc opposite the LHD or in tents around the humanitarian hub or alongside the canal.

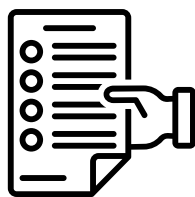
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*"I help create a connection between the guest family and the host family through our cultural traditions. My goal is to pass on the old and beautiful Afghan tradition of hospitality to our younger generation. I believe this is an excellent opportunity: the family without shelter finds a safe place to stay, and the Afghan family living in Belgium stays connected to the respectful traditions of our homeland." (Habib, Startpunt Coordinator)*

Through the LHD, specialised lawyers were assigned to the persons affected by the new policy. The decisions by Fedasil refusing accommodation were challenged before the **Labour tribunals**, which, in several decisions, have ruled that the decisions were **unlawful**. Fedasil appealed these decisions. During the appeal period, Fedasil was supposed to house the families; however, under instructions from the Minister for Migration, they were not allowed to comply with the labour tribunal's orders. In a later stage, the Minister indicated that families (not single men) with a court injunction could be housed in a return centre. However, until today, many families having received a court injunction have not been invited to the reception network.

Several of the families affected by the new policy have applied for the **suspension of the new legislation** at the Constitutional Court. Together with other organisations, **Vluchtelingenwerk brought an Annulment Appeal against the changes in the Reception Act to the Constitutional Court**. In case of success, this would lead to the new legislation begin structurally removed from the legal system.



The team filled out around **515 request forms** for a legal aid lawyer.



**22 M-status cases**  
(people who have already refugee status in another EU country)



**1 referral** to Pagasa  
(an organization who supports **survivors of human trafficking**)



### Ukraine and Temporary Protection

It has been nearly four years since Russia launched its full-scale invasion of Ukraine in February 2022. The ongoing conflict has forced approximately 6.9 million people to flee the country.<sup>7</sup> In response, the European Union activated the Temporary Protection Directive (TPD) for the first time. The TPD enables EU Member States (MS) to provide immediate and temporary protection (TP) in situations of mass influx, allowing displaced persons who cannot safely return home to access swift protection while preventing excessive pressure on national asylum systems.

Although the TPD foresees TP lasting between one and three years, the current application of the scheme has been extended until 2027 - bringing the total duration to five years. Additionally, the TPD allows for the free movement of people to whom the Directive is applied. The TPD also allows beneficiaries to move freely within the EU.<sup>8</sup>

Since February 2022, 99.926 people have received TP in Belgium. Every day, around 35 people are still being granted temporary protection.<sup>9</sup> In practice, considering the high refusal rates, the number of people applying each day is higher than the number of persons obtaining TP, with a peak on the 8<sup>th</sup> of September, when approximately 200 people were in line as compared to an estimated average of around 60 persons a day during the summer months.<sup>10</sup>

The number of rejection decisions has quadrupled in the space of a year. This is mostly due to uncertainties and a lack of transparency surrounding the burden of proof, and to a more stringent approach towards TP applicants who already received TP in another Member State following a EU Council implementation decision.<sup>11</sup>

Moreover, access to Ariane (temporary centre) is only provided for those who have already received temporary protection. Persons awaiting a decision or persons who – due to a lack of registration capacity in the past – were not able to register on the same day, were exempted from Ariane. Solutions could sometimes be found through the Brussels based organization Ukrainian Voices, but these are short-term and not always guaranteed. Thus, the team has encountered multiple people who come back to the registration centre to find housing solutions and has observed an increased number of Ukrainian refugees without access to accommodation.

[7] [Conflict in Ukraine](#)

[8] [Temporary Protection Directive](#)

[9] [Temporary Protection Monthly Statistics, October 2025.](#)

[10] [No numbers available on number of applicants; these numbers are based on observations from the Infoline](#)

[11] [COUNCIL IMPLEMENTING DECISION \(EU\) 2025/1460 of 15 July 2025](#)