

**European Union  
67000 Strasbourg  
France**

12. 05. 2025

**Subject: Human rights violations and inefficient use of EU funds**

The Slovak Chamber of Teachers unusually turns to you with a problem in which we have already exhausted several state options. This is the repeated and serious violations of the rights of refugee Ukrainian children in school system. The Chamber has repeatedly approached the Ministry of Education over the last 6 months and even before that with an appeal to such violations. In March 2025, we delivered a pre-litigation appeal to the Ministry of Education. We are contacting you in an effort to avoid a lawsuit with SR, which would definitely damage the reputation of our country in Europe. The infringement concerns Ukrainian children from approx. 4 to 18 years old, related to tens of thousands of children. What are the issues?

1. The Ministry of Education applied to the EU and was granted a grant for refugee children between January 2023 and February 2025 increased the norms twice for each UA child. This was EU funding of approximately EUR 100 million. These funds were used essentially without direct support of children and their integration. The Ministry handed over the money to schools without guidance, monitoring link to UA children, or even tracking any indicators and reports. Schools subsequently spent the finances unprecedentedly on school operations, purchasing supplies, remodeling buildings and furniture purchases. The UA children did not increase school costs in any way (no new classes were created, only the amount of children in classes increased, energy bills were not higher). The costs of bringing Ukrainian children into the schools were minimal, even though the EU has allocated 100 million euros for them, even with the earmarking of Commission Delegated Regulation (EU) 2023/1676 of 7 July 2023 says in the introduction under 4): 'Given that additional efforts need to be made to address the specific needs of state third-country nationals, including refugees and people who have fled Russian aggression against Ukraine, specific unit costs should be established for the types of operations concerned.'
2. Since the arrival of refugee children from the UA, the Ministry of Education has not taken any measures to support in the school environment. The website for parents or general information website were upated in the summer 2022, i.e. 3 years old. Since the war, the Ministry has not prepared any guidelines, materials, steps on how to integrate refugee children into schools. A serious problem is that the Ministry has not provided any strengthening of psychosocial support for these children in schools - in the counselling and prevention system or school support teams. All international documents mention the need to provide this support in their language.

Not a single guideline, not a single aid, not a single euro has come from the ministry to support these services. There are no Ukrainian diagnostic manuals, there are no therapists, psychologists, social workers, therapeutic educators, who would be employed by the education system to support children. Despite 100 million from the EU funds that have been earmarked for such support.

3. The Ministry of Education has not provided any language assistance to refugee children, there are no documents to guide this issue, after a lot of pressure the school law was made some concessions have been made (e.g. that children can be ungraded for longer periods of time), but without any further information. In the law, the possibility for adaptive classes for children of foreigners was released (this happened 3 years after the beginning of the war) and the Ministry has not prepared any systemic concept of such classes (currently the Ministry is working on something, but it is very inadequate) and, above all, without any financial coverage. Only the so-called support measure for language courses is allowed - where there is the possibility of 200 hours of basic and about 150 hours of extension courses. The number is very insufficient, at the same time the state does not cover these numbers of hours financially, it does not allow under the Labour Code to employ people for this support (the Ministry has decided to support only the purely taught 45 min. hour, not the preparations and the amount of time to educate these people, as we do not have experts or study fields in Slovakia for this). There are one-off activities for state language school courses being prepared from EU funds or the state budget, but there is chaos, delays and, of course, the absence of any state concept. We do not have a curriculum for these children, we do not have regulated testing, admissions and matriculation, as in neighbouring countries.

4. The failure to adopt any educational policy to support the children of foreigners is also a serious problem. We do not have a regulated curriculum for them, regulated national testing, admission interviews or matriculation exams. These children must therefore face serious discrimination and compete in a weak secondary education market with Slovak children, who have an extremely large linguistic advantage. Ukrainian children have not come to Slovakia to build a career, nor to seek work or better conditions. They had to run away from the bombing in their pyjamas. They are children from whom life has taken everything. And many of us look into their eyes with humility every day.

5. Incomplete statistics, published so far, show that we have only a very small proportion of UA refugee children enrolled in secondary schools because they do not pass the barrier of Slovak admissions. Secondary schools refuse to accommodate them in the admissions process because there is often a glut of places, both officials and some principals will even outright say that why should Slovak children be discriminated against, which is often due to pro-Russian sentiments in Slovakia. This is despite the fact that Slovakia has committed in the Convention to provide comprehensive care to refugee children.

6. At schools we repeatedly receive suggestions from UA parents that Slovak teachers forbid children to speak Ukrainian with friends with an addendum: "In Slovakia, Slovak", we have documented this from parents' suggestions. The Ministry has never directed the schools to do this, despite warnings.

To sum up the issue: Ukrainian children are discriminated in Slovak schools, they are not given the necessary help for inclusion, children with special needs are not provided with any service. The Ministry is unable to document basically any relevant support instruments, methodological guidance, monitoring or funding for the necessary measures. The State School Inspectorate has drawn attention to the serious state of this problem (Analysis and Recommendations, 2023), as well as the expert organisation Centre for Educational Analysis has issued 4 analytical reports (2022-2025). The Supreme Audit Office has also freshly joined in with a critical analysis on the dysfunctional state support for the integration of foreigners (April 2025). The situation in Bratislava is closely monitored and implemented within the civil society by the Inclusion Centre - Centre for Inclusive Education and it is clear from the work with children from Ukraine and their families that support has not been forthcoming from the state to this day. Many children are experiencing typical manifestations of post-traumatic stress disorder (PTSD), depression, anxiety, self-harm, substance and non-substance addictions, isolation and already emerging radicalisation. The state has provided no systemic help for schools, has not collaborated with the civic sector, which has acquired know-how on the issue, and has allowed the elementalism to grow. This will have extremely serious consequences for the state of these children's mental health, their future, their career development, the quality of their education and their employability on the labour market. The best interests of the child, as declared in the Convention and especially in UN Commentary No. 14/2013 on the best interests of the child, have been grossly violated in Slovakia in the case of these children, and the consequences can be fatal in many cases (currently we have about 40 UA children in BA grammar schools, which is a fraction of what it should be with the number of UA children). No systemic action is forthcoming and it is the duty of our trade union not only to draw attention to this but also to demand remedy. We are ready to make the above submission to the European Commission after consultation and we are ready to translate the above letter into a lawsuit at the European Court of Human Rights.

Yours sincerely

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