

JULY - DECEMBER 2025

POLICY OF NON-RECEPTION Report



Timeline and key events

JULY 2025 :

The federal parliament votes in favour of the package of “crisis measures”

On 10th July, the federal parliament approves the package of “crisis measures”. These measures include an amendment to the 2007 Reception Act.¹ This allows Fedasil to refuse reception to applicants who already have international protection (IP) in another EU member state and to accompanied minors who submit a first application for IP in their own²).³

Myria and the Federal Institute for Human Rights (FIRM) sound the alarm

Myria and FIRM publish a report⁴ on Belgium’s follow up to the *Camara v. Belgium* judgment handed down by the European Court of Human Rights. In this judgment, the Court found a violation of the right to an effective remedy. According to Myria and FIRM, “Belgium has not only failed to improve its reception management but has also announced and taken new measures that threaten to increase violations of asylum seeker’s fundamental rights. Moreover, the Belgian authorities have deliberately failed to implement thousands of court decisions.”⁵

AUGUST 2025 :

A red line has been crossed: families with children are sleeping on the streets

The amendment to the Reception Act entered into force on 2 August. This allows Fedasil to refuse reception to applicants who already enjoy IP in another EU member state (‘M-status’). Although individual vulnerabilities must be considered and any refusal of reception must be reasonable and proportionate the minister for Asylum and Migration is instructing Fedasil to put families with very young children out on the street as well.⁶

SEPTEMBER 2025 :

Minister instructs Fedasil to disregard court rulings

Several families without shelter file a unilateral petition against Fedasil at the Brussels Labour Court. The judge overturns the decisions to refuse shelter and obliges the Federal Agency to provide shelter to these families. However, the Minister for Asylum and Migration gives Fedasil explicit instructions to ignore these court rulings.⁷

¹Loi du 12 janvier 2007 sur l'accueil des demandeurs d'asile et d'autres catégories d'étrangers, https://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=fr&la=F&cn=2007011252&table_name=loi.

²Dans ce rapport, nous utilisons de manière équivalente les termes « demandeur·euses de protection internationale » (aussi appelé·es “DPI”) et “demandeur·euses d’asile”.

³EMN Belgium, “La Belgique publie deux nouvelles lois considérant comme ultérieures les demandes déjà traitées ailleurs et limitant l'aide à l'accueil”, 23 juillet 2025 :

<https://emnbelgium.be/fr/nouvelles/la-belgique-publie-deux-nouvelles-lois-considerant-comme-ulterieures-les-demandes-deja>.

⁴Myria, “Communication au Conseil de l'Europe sur la crise de l'accueil”, 15 juillet 2025.

<https://www.myria.be/fr/publications/communication-au-conseil-de-leurope-sur-la-crise-de-laccueil>.

⁵Myria, “Communiqué de presse, Crise de l'accueil : Myria et l'Institut fédéral des droits humains alertent sur un recul des droits”, 18 septembre 2025.

<https://www.myria.be/fr/publications/crise-de-laccueil-myria-et-linstitut-federal-des-droits-humains-alertent-sur-un-recul-des-droits>.

⁶RTBF, “Des familles de demandeurs d'asile dorment à nouveau dans les rues de Bruxelles”, 20 août 2025.

<https://www.rtbf.be/article/des-familles-de-demandeurs-d-asile-dorment-a-nouveau-dans-les-rues-de-bruxelles-11589145>

⁷RTBF, “A la demande de la ministre de l'Asile et de la Migration”, Fedasil refuse l'hébergement à une famille malgré une décision de justice”, 11 septembre 2025, <https://www.rtbf.be/article/a-la-demande-de-la-ministre-de-l-asile-et-de-la-migration-fedasil-refuse-l-hebergement-a-une-famille-malgre-une-decision-de-justice-11599466>.

Samusocial sounds the alarm: the organisation cannot provide accommodation for mothers with young children

Since the amendment to the Shelter Act came into force in August, Samusocial has had to turn away almost 400 families – a total of 1,500 people. The organisation sees a clear link with the stricter shelter policy. At the same time, the federal government decided to stop providing funding for winter shelter for homeless people in the country's five largest cities through the "Cold Weather Emergency Plan". This means that each city will lose €65,000 in funding.⁹

The Council of Europe is concerned about the situation in Belgium

The Committee of Ministers of the Council of Europe, which monitors the implementation of the Camara judgment of the European Court of Human Rights, is concerned about the continuing reduction in the number of reception places and the budgetary measures announced by the federal government. In a new decision, it calls on the Belgian authorities to: "use all possible means as soon as possible to find a lasting solution to the reception crisis and thus be able to implement all court decisions, and to establish an adequate budget and clear timetable for this purpose."¹⁰

OCTOBER 2025 :

Letter from the judiciary to the Minister for Asylum and Migration

The Court of Cassation, the College of Attorney Generals and the college of Courts and Tribunals publish an open letter entitled '*Judicial rulings are binding – even for ministers*'.¹¹ In a rare statement, the judiciary responds sharply to the disturbing statements made by the Minister of Asylum and Migration. She indicates that she will not pay the penalties and refuses to comply with the judges' decision regarding reception. The judiciary states that "*Minister Van Bossuyt's statements are symptomatic of a worrying development in which a member of the executive branch believes they can place themselves above the law. This is contrary to the principles of a democratic constitutional state.*"

Families file complaint against Minister of Asylum and Migration

Four families of homeless asylum seekers file a criminal complaint against the Minister of Asylum and Migration for inhumane and degrading treatment and failure to provide assistance to persons in need. They criticise the minister's refusal to allocate them accommodation, despite the labour courts rulings imposing penalty payments.¹²

The Brussels Beguinage Church temporarily shelters several families

At the beginning of October, the Brussels Beguinage Church launches a politically symbolic action. It temporarily shelters three families who were not given accommodation by Fedasil. These families had previously received a positive decision in Greece, but were living there in total deprivation. After their arrival in Belgium, Fedasil simply put them out on the street. With this action, the church wants to denounce this inhumane policy and demonstrate that it is our human duty to take in these families.¹³

⁹Samusocial, "Un cap alarmant : le Samusocial contraint de refuser l'accueil à des femmes victimes de violences conjugales avec enfants", 9 septembre 2025, <https://samusocial.be/un-cap-alarant-le-samusocial-contraint-de-refuser-laccueil-a-des-femmes-victimes-de-violences-conjugales-avec-enfants/>.

¹⁰RTBF, "Suppression des aides fédérales au plan "grand froid" : PTB et Ecolo dénoncent, le PS réclame la suspension", 22 septembre 2025, <https://www.rtbf.be/article/suppression-des-aides-federales-au-plan-grand-froid-le-ps-reclame-la-suspension-de-la-mesure-11604875>.

¹¹Comité des Ministres du Conseil de l'Europe, H46-6 Camara c. Belgique (Requête n°49255/22), 17 septembre 2025, <https://search.coe.int/cm/fre?i=0912594880282efa>.

¹²Collège des procureurs généraux, Collège des cours et tribunaux et la Cour de cassation, communiqué de presse, "Pouvoir judiciaire, « Les décisions judiciaires sont contraignantes – même pour les ministres »", 1 octobre 2025, https://www.rechtbanken-tribunaux.be/sites/default/files/media/news/files/communiqu-de-presse-pouvoir-judiciaire-1er-octobre-2025_0.pdf.

¹³BX1, "Asile et migration : quatre familles portent plainte au pénal contre la ministre Van Bossuyt", 3 octobre 2025, <https://bx1.be/categories/news/asile-et-migration-quatre-familles-portent-plainte-au-penal-contre-la-ministre-van-bossuyt/>.

¹⁴House of Compassion, "Pas d'enfants à la rue. Point.", <https://www.houseofcompassion.be/fr/pas-denfants-a-la-rue-point/>.

Half of Fedasil reception centres do not meet their own quality standards

Research by the Flemish Office of the Children’s Rights Commissioner shows that half of Fedasil reception centres do not meet their own quality standards. Safety, hygiene and privacy are substandard and inhumane. After five years of research, Odisee University of Applied Sciences has also come to similar conclusions. According to Odisee, the emotional, physical and sexual safety of children cannot be guaranteed.¹⁵

Fedasil finally provides shelter to families with a court ruling

Fin novembre, Fedasil offre finalement l’accueil aux familles ayant obtenu un jugement favorable du tribunal du travail. Elles sont désormais invitées à rejoindre le « centre Dublin » à Zaventem.¹⁶ Bien qu’il s’agisse d’un pas en avant, l’accueil dans ce centre est axé sur le retour et ne constitue pas un environnement adapté aux familles avec de jeunes enfants.

Affected families file an appeal for suspension with the Constitutional Court

Several affected families are challenging the amendment to the Reception Act before the Constitutional Court. They are initiating suspension proceedings with a request to suspend the amendment pending a ruling on its constitutionality. The Court will rule on this in the spring of 2026. At the same time, organisations defending the rights of refugees and humanitarian organisations are appealing to the Constitutional Court to reverse these restrictive changes to the Reception Act.¹⁷

The waiting list and refusals to provide shelter

On 1st December, 1,759 people were on the waiting list for shelter (single men). Between August and mid-November, Fedasil also refused to provide shelter to 249 asylum seekers with ‘M status’, including families and single women and men.¹⁹



¹⁴Kinderrechtencommissariaat, “Kinderen leven steeds vaker zonder de nodige basisveiligheid”, 20 novembre 2025, p.2, <https://www.kinderrechten.be/sites/default/files/2025-11/20251120%20PB%20Kinderen%20leven%20steeds%20vaker%20zonder%20de%20nodige%20basisveiligheid%20def.pdf>.

¹⁵Fournier, K., Van Acker, K., Lavent, M., Geldof, D. Cornu, A. & Piessens, A., “Droits de l’enfant et sécurité : les bases de la politique d’accueil. Leçons tirées de 5 années de recherche sur les enfants dans les centres d’accueil pour demandeurs d’asile”, Bruxelles, Centre d’étude sur les familles, Odisee, 2025, https://www.odisee.be/sites/default/files/public/2025-12/Lessons_learned_FR.pdf.

¹⁶Myria, Réunion de contact Protection internationale, 19 novembre 2025, p.45, https://www.myria.be/files/20251119_PV_r%C3%A9union_contact_PL_-_contactvergadering_IB.pdf.

¹⁷Moniteur belge, 2025009609, 30 décembre 2025, https://www.ejustice.just.fgov.be/cgi/article.pl?language=fr&sum_date=2025-12-30&lg_txt=F&numac_search=2025009609.

¹⁸Fedasil, “Réseau d’accueil pour demandeurs d’asile en Belgique – au 01.12.2025”, <https://www.fedasil.be/sites/default/files/content/download/files/reseau%20accueil%20Fedasil%2020251201.pdf>.

¹⁹Myria, Réunion de contact Protection internationale, 19 novembre 2025, p.45, https://www.myria.be/files/20251119_PV_r%C3%A9union_contact_PL_-_contactvergadering_IB.pdf.

Places in local reception initiatives (LRIs) and reception centres on defence sites are closing their doors en masse

The number of LRI places is falling sharply. Although the number of requests international protection (IP) is still relatively high, local authorities are taking the initiative and closing down well-functioning LRIs. On the one hand, this is a consequence of the abolition of the federal subsidy for local authorities who have LRIs.²⁰ On the other hand, this seems to be a precursor to the federal government's phase-out plan. With this plan, Arizona wants to "drastically reduce" the number of reception places, with priority given to closing LRIs. In addition, the government decides to close all reception centres on defence sites so that the army can reuse these areas. All this in a context where there is a constant shortage of reception places and it is difficult to find qualified personnel.

UNHCR calls on Belgium to take action

In an open letter in *Le Soir*, the representative of UNHCR in Belgium and at the European institutions criticises the situation of asylum seekers in Belgium and calls on Belgium to show political leadership. He states: "The way we treat people seeking safety says a lot about the kind of society we want to build, for ourselves and for future generations. Leaving people who have fled armed violence or persecution out on the street is not an option."²¹



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²⁰EMN Belgium, "La Ministre de l'Asile et de la Migration, Anneleen Van Bossuyt, met fin aux subventions pour les nouvelles Initiatives Locales d'Accueil", 18 mars 2025, <https://emnbelgium.be/fr/nouvelles/la-ministre-de-lasile-et-de-la-migration-anneleen-van-bossuyt-met-fin-aux-subventions>.

²¹Jean-Nicolas Beuze, "Crise de l'accueil : qu'ai-je ressenti ? De l'injustice", *Le Soir*, 19 décembre 2025, <https://www.lesoir.be/717901/article/2025-12-19/crise-de-laccueil-quai-je-ressenti-de-linjustice>.

The non-reception policy has continued unabated in recent months and has crossed a red line.

On the one hand, the government is normalising this policy and the Minister of Asylum and Migration is giving the impression that the situation is under control. She is making it seem as if *“no one has to sleep on the streets”*. The waiting list for shelter has been below 2,000 people for some time now, and the federal government is funding 2,000 places in the Brussels homeless network. According to the minister, this “Brussels Deal”, implemented by humanitarian NGOs, ensures that everyone on the waiting list has a roof over their head. This is not true, as the places in the Brussels Deal are not reserved for applicants for IP. These places are unconditional and therefore accessible to anyone in need. Furthermore, there is no automatic referral from Fedasil to the Brussels Deal places. This means an applicant on the waiting list is left to fend for themselves and will end up on the streets if they cannot find a solution. Finally, it is established European case law that Fedasil may not shift its responsibility for reception to NGOs and other civil society organisations.²²

On the other hand, the government has approved new reception legislation that goes further than the previous government. Fedasil is applying this legislation very strictly, with consequences immediately felt by humanitarian organisations in Brussels. Since the summer, not only single men have been sleeping on the streets, but also more vulnerable groups such as single women and families with children. The demand for sleeping places for families with very young children has never been so high. This new reception policy was quickly condemned by labour courts. Initially, the minister stated that Fedasil should ignore these rulings, which led to a sharp open letter from the judiciary. The longer the non-reception policy lasts, the greater the tension between the executive and the judiciary.

FEDASIL IS FAILING TO PROPERLY IMPLEMENT THE NEW RECEPTION ACT DESPITE CLEAR RULINGS BY THE LABOUR COURT

At the beginning of August, an amendment to the Reception Act entered into force. As a result, Fedasil is able to refuse reception to two new categories of applicants for IP. On the one hand, the Agency can refuse reception to applicants for IP who have already been granted protection status in another European Member State (M status). On the other hand, it can refuse reception to families whose underage children submit a first application for IP in their own name after a final negative decision for their parents. Although Fedasil must justify each refusal of reception individually, taking into account the vulnerabilities of the persons concerned, the Agency applies this new legislation strictly. Less than 20% of applicants with M status were granted access to reception because they showed specific vulnerabilities.²³ Families with children under the age of three also end up on the streets therefore de facto not considered sufficiently vulnerable.

In September, the French-speaking Labour Court of Brussels overturned several refusals of Fedasil to grant shelter.²⁴ The court ruled that Fedasil had not taken sufficiently into account individual circumstances and vulnerabilities and had failed to demonstrate how it would guarantee the human dignity of the applicants concerned. In other words, Fedasil was applying the new legislation poorly and needed to provide better justification for its decisions to refuse shelter.

²² CJUE (Grande Chambre), 12 novembre 2019, HAQBIN c. FEDASIL, C-233/18, ECLI:EU:C:2019:956, §49 – §50.

²³ Myria, Réunion de contact Protection internationale, 19 novembre 2025, p.45.

https://www.myria.be/files/20251119_PV_r%C3%A9union_contact_PI_-_contactvergadering_IB.pdf

²⁴ L’Echo, “Familles qui dorment en rue : la justice donne tort à Van Bossuyt”, 16 octobre 2025,

<https://www.lecho.be/dossier/migrants/familles-qui-dorment-en-rue-la-justice-donne-tort-a-van-bossuyt/10631649.html>

The Minister for Asylum and Migration then explicitly instructed Fedasil to ignore these rulings.²⁵ She further stated that it was the choice of the families concerned to remain on the streets²⁶. This reasoning places the responsibility for homelessness on the victims of political choices. The Arizona government has chosen to simply put various categories of applicants on the streets, without addressing the root causes of the situation. In this case, the failure of Greek policy towards recognised refugees is the main reason why these people continue to travel to Belgium despite their protection in Greece²⁷.

After several concerned signals from the judiciary, the Minister for Asylum and Migration decided at the end of November to respect these court rulings after all²⁸. The affected families receive an invitation to a reception centre in the Dublin centre in Zaventem. Although this is a regular open centre, the underlying message behind the allocation of this place seems clear: *'These families are not welcome here'*. However, they have the right to reapply for IP and to demonstrate that protection in the other country is not effective. Denying them a basic right during this procedure is pointless. Moreover, a high-quality asylum procedure begins with access to reception.

AS LONG AS THE WAITING LIST FOR ACCOMMODATION EXISTS, BELGIUM IS VIOLATING THE RIGHT TO ACCOMMODATION

During this period, attention was mainly focused on families with children, but single men are still not being provided with accommodation on the day of their request. They are told there is a shortage of reception places and that they can register on a waiting list for accommodation. Since the amendments to the Reception Act came into force, single men with M status no longer have access to the waiting list or are removed from it. This has resulted in a shorter waiting list, but it does not mean that fewer people need reception. On 1st December 2025, there were 1,759 people on this waiting list. As soon as a place becomes available, applicants are invited by email or through referral by humanitarian organisations (if they are lucky enough to have gained access to a place) to report to a reception centre in the Fedasil network. During this waiting period, these men are left to fend for themselves. They often end up at the Humanitarian Hub's day centre, where they ask for a place in the homeless network. Unfortunately, organisations such as Samusocial, Belrefugees and Croix-Rouge can rarely respond positively to their requests because all the places are saturated.²⁹ These places are also limited and are initially reserved for the most vulnerable. This means that every day, there are still applicants for IP who have to sleep on the streets. It remains the duty of the federal government to guarantee these people a dignified living and to provide them with shelter. Declaring that *"no one has to sleep on the streets"* is wrong and ignores reality and political responsibility of the federal government.

Despite the high number of people on the waiting list, the total number of reception places steadily declined in the second half of 2025. At the beginning of 2025, the network had 36,205 places; on 1st December, there were 34,878. This decline is mainly due to the closure of LRIs. The Arizona government wants to close these small-scale reception

²⁵ RTBF, "A la demande de la ministre de l'Asile et de la Migration, Fedasil refuse l'hébergement à une famille malgré une décision de justice", 11 septembre 2025, <https://www.rtbfb.be/article/a-la-demande-de-la-ministre-de-l-asile-et-de-la-migration-fedasil-refuse-l-hebergement-a-une-famille-malgre-une-decision-de-justice-11599466>.

²⁶ La Libre, "Familles à la rue : Fedasil condamné, un revers pour la ministre Anneleen Van Bossuyt", 17 octobre 2025, <https://www.lalibre.be/belgique/politique-belge/2025/10/17/familles-a-la-rue-fedasil-condamne-un-revers-pour-la-ministre-anneleen-van-bossuyt-AH6HDVIFLDH7AYV2QNNV2HOYI/>.

²⁷ Refugee Support Aegean et Stiftung PRO ASYL, "Recognised refugees 2025 – Access to documents and socio-economic rights", mars 2025, https://rsaeegean.org/wp-content/uploads/2025/04/RSA_BIP_Report_EN.pdf.

²⁸ L'Echo, "Judiciaire : le procureur général de Bruxelles Frédéric Van Leeuw s'insurge contre la ministre Anneleen Van Bossuyt", 29 septembre 2025, <https://www.lecho.be/dossier/migrants/judiciaire-le-procureur-general-de-bruxelles-frederic-van-leeuw-s-insurge-contre-la-ministre-anneleen-van-bossuyt/10626140.html>.

²⁹ RTBF, "Bruxelles : le Samusocial, contraint de refuser l'accueil à 25 familles en une journée, tire la sonnette d'alarme", 19 août 2025, <https://www.rtbfb.be/article/bruxelles-le-samusocial-contraint-de-refuser-l-accueil-a-25-familles-en-une-journee-tire-la-sonnette-d-alarme-11589246>.

places as a matter of priority as soon as the number of requests for IP falls structurally. Since October 2025, the number of requests has actually been lower than during the same period in 2024.³⁰ However, it is still too early to speak of a structural decline.³¹ During previous periods of shelter shortages, we learned that the premature closure of shelters was one of the causes of the shortage.³² Nevertheless, local authorities seem to be taking the initiative to close their local shelters. This seems to be a continuation of an older trend. In 2020, there were still 5,955 LRI places, compared to 3,888 in 2025. However, the federal government could encourage local authorities to keep their LRIs open and, in the long term, convert them into small-scale reception centres for vulnerable applicants or into transitional housing for recognised refugees, as provided for in the federal coalition agreement.



PROVIDING ASYLUM SEEKERS WITH ACCESS TO SHELTER IS CHEAPER IN FINANCIAL AND HUMAN TERMS

This government has clearly chosen to maintain its policy of not providing shelter and to put new groups of asylum seekers out on the street. In doing so, the Belgian state continues to ignore its international obligations and numerous court rulings. This is increasingly undermining the rule of law.

On the ground, these choices cause great harm: people start their asylum procedure with additional trauma and a serious disadvantage. These invisible costs are difficult to measure, but they are felt every day by humanitarian organisations and the people affected. In the long term, it is cheaper, more efficient and, above all, more humane to give all applicants access to quality reception facilities. Belgium has the means and the obligation to make this happen.

³⁰ CGRA, Statistiques asile : aperçu de 2025, 27 janvier 2026 : <https://www.cgra.be/fr/actualite/statistiques-asile-apercu-de-2025>.

³¹ La Libre, "Le nombre de demandes d'asile a diminué en Belgique. Mais est-ce grâce à la politique de l'Arizona ?", 14 janvier 2026, <https://www.lalibre.be/belgique/2026/01/14/le-nombre-de-demandes-dasile-a-diminue-en-belgique-mais-est-ce-grace-a-la-politique-de-larizona-5LK5YJAJRJENRPKUJE4XWRYK4I/>.

³² CIRÉ, "Crise de l'accueil des demandeur-euse-s d'asile – une histoire sans fin décembre 2021", <https://www.cire.be/download/271/analyses-etudes/24459/crise-de-laccueil-des-demandeur%2%b7euse%2%b7s-dasile-une-histoire-sans-fin.pdf>.



RECEPTION ACT 12/01/2007 -

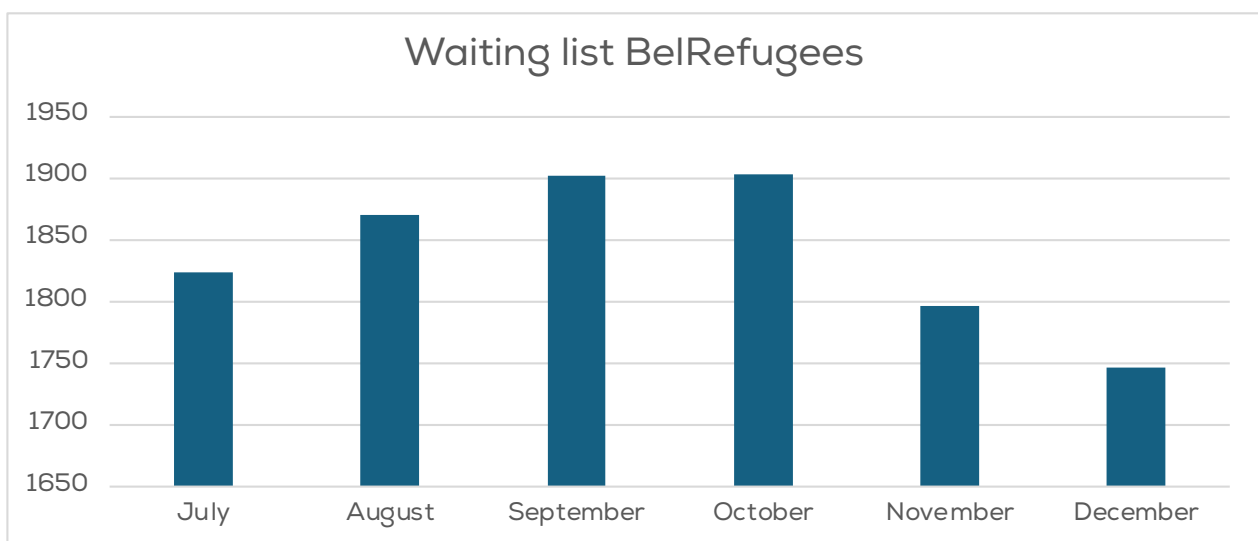
“Every asylum seeker is entitled to reception conditions that enable them to live a life that is compatible with human dignity. Reception conditions are understood to mean material assistance consisting of...

... Housing, food and clothing ...

HOUSING

We note that applicants for IP still use emergency shelters because they do not have access to the Fedasil reception network. Between July and December 2025, applicants still accounted for 13% of the 6,536 people accommodated in Samusocial’s emergency shelters³³. Although these centres provide a safety net for asylum seekers in precarious situations, they remain difficult to access due to a lack of sufficient places. In the last six months of 2025, Samusocial refused an average of 62% of requests for shelter from single men, regardless of their administrative situation³⁴. For families, this figure was even higher, reaching an average of 75% per month between July and December 2025.

Figures from Belrefugees show that 61% of the 6,252 single men taken in submitted a request for IP. This is a slight decrease of 3% compared to the first six months of the year. As these centres operate a waiting list based on registration with the Humanitarian Hub, there are no cases of “refusal of shelter”. The average waiting time for a place in Belrefugees’ emergency shelter in the last six months of the year was 24 days for men and 16 days for women.



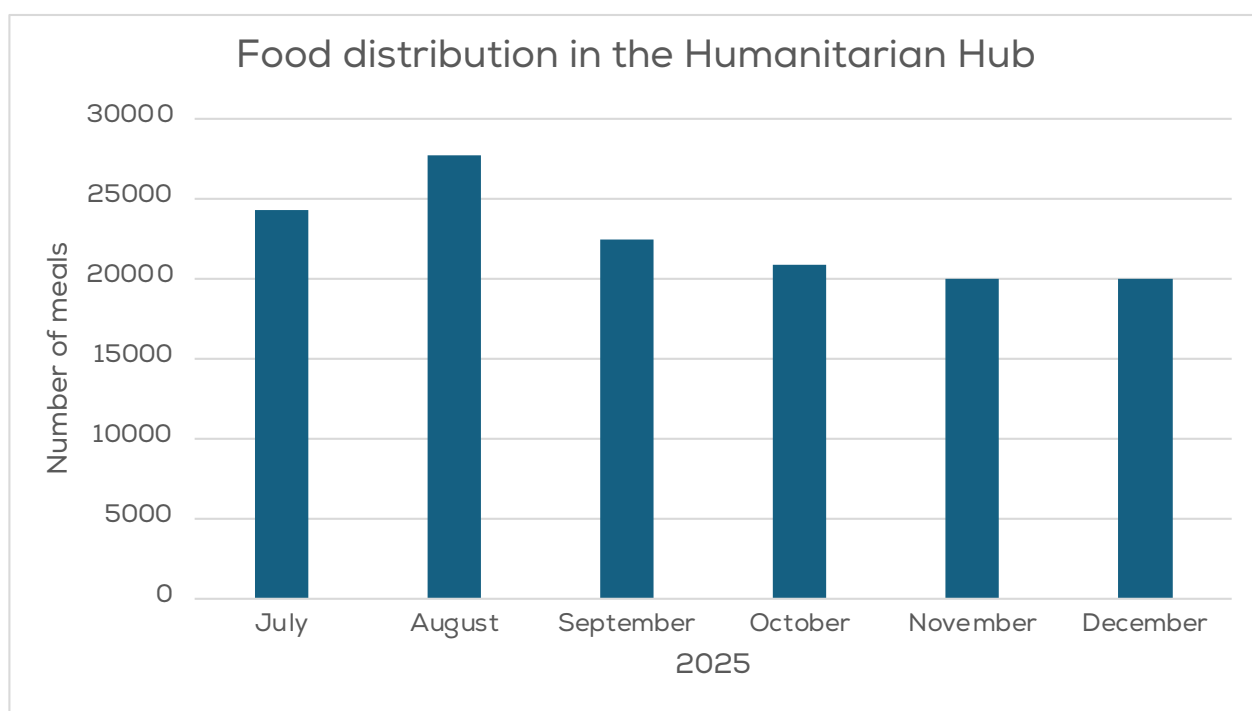
³³ It should be noted that, of the total number of people accommodated during this period, the status of 35.8% of them is unknown.

³⁴ A request for accommodation refers to a request for an overnight stay in an emergency shelter. The same person may have requested an overnight stay several times during the same period.

In its centre for unaccompanied minors in transit, Belrefugees mainly accommodates young people from Eritrea and Ethiopia. Of all the young people who were accommodated between July and December, 21% ultimately submitted an application in Belgium.

FOOD AND CLOTHING

Access to clothing and food remains an important need for people seeking IP who find themselves in a precarious situation. Many of the people who visit the Humanitarian Hub go to the food distribution point and make use of the clothing bank. Between July and December 2025, the Hub served 135,000 meals, for an average of 803 meals per day. In terms of clothing, 4,907 requests were submitted by men and 1,375 by women during the same period. These figures underline the importance of the demand for and supply of these services for the people who use them.



... Medical, social and psychological support...

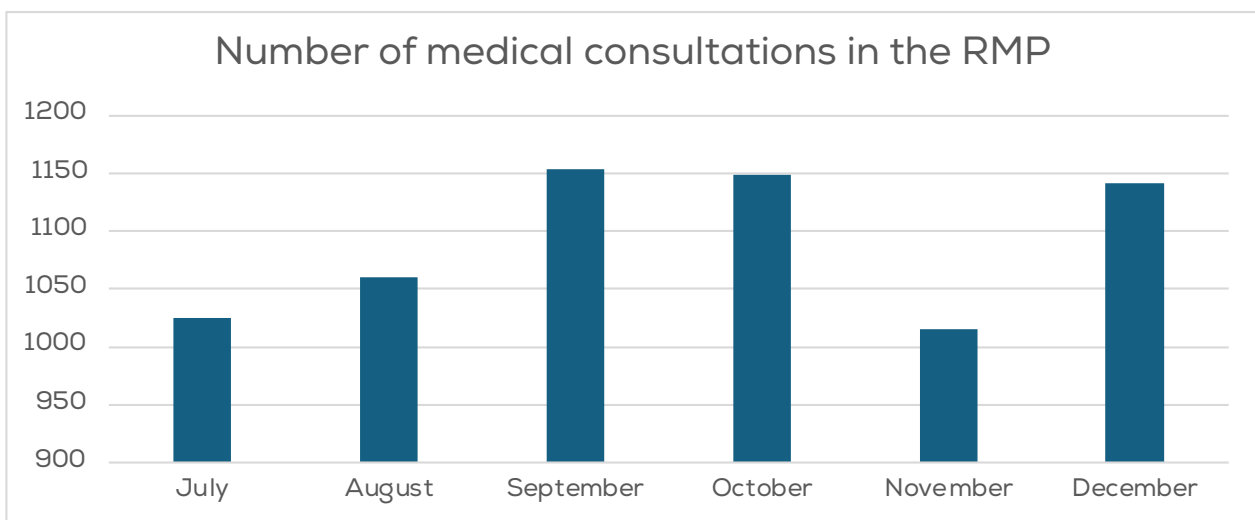
This non-reception policy has negative consequences on the health of persons requesting IP.

OVERLOAD OF SERVICES AND DIFFICULT ACCESS TO HEALTHCARE

Applicants without a reception place have more difficult access to healthcare. Due to the non-reception policy, they do not have access to medical, social and psychological support through the medical office of the Fedasil centres. They must therefore turn to humanitarian organisations such as the Refugee Medical Point (RMP), Médecins Sans Frontières (MSF), the health service of the Humanitarian Hub and the various services of Médecins du Monde (MdM) in order to receive treatment.

Although the RMP's task is to provide healthcare to asylum seekers, this target group is added to all other vulnerable groups in the Brussels Region in other projects. At the RMP, 92% of the patients are asylum seekers, and in the second half of 2025, the RMP recorded a significant

increase in the use of its services. In the Belrefugees emergency shelter, where MdM is active, 74% of people seeking medical assistance are asylum seekers. At the Humanitarian Hub, 56% of the people seen in medical consultations are asylum seekers. During this period, the Humanitarian Hub was only able to meet 85% of requests for assistance due to insufficient available places. This means that 185 people were refused medical assistance, 74% of whom were IP applicants. It is important to note that the number of available medical consultations in the Humanitarian Hub halved from November 2025 onwards, resulting in a sharp increase in the number of refusals. This decline in the number of consultations is in line with the logic of completely discontinuing medical services in April 2026. This discontinuation is a direct result of significant budget cuts at the Humanitarian Hub level. In addition to the consultations offered, the health team is present at the day centre in the afternoon to approach people and answer questions about health. If necessary, the team refers people to external service providers. The external referrals are divided as follows: 60% to Athena for people without access to care, and 35% to the RMP when it comes to applicants. However, Athena has closed its doors since December due to insufficient subsidies. As a result, applications from various target groups will be concentrated even more on increasingly smaller structures and locations.



Furthermore, the non-reception policy makes it virtually impossible for healthcare providers to continue providing care. The RMP and the Humanitarian Hub’s health service try to refer people who need follow-up to medical centres. This was made considerably easier by MdM’s Tooline1 project, which developed a toolkit to ensure that medical centres have all the resources they need to treat asylum seekers. Tooline1 has also developed a tool to simplify billing to Fedasil for medical centres that wish to do so. Despite these efforts, the possibilities are limited by the overload of the primary care network. In addition, many appointments or medical examinations require prior administrative steps if applicants want reimbursement from Fedasil. To do so, they need a requisition form. This is a guarantee for the healthcare provider that Fedasil will cover the costs. While reimbursements are handled by the staff of the reception centre, applicants without shelter must arrange this requisition form themselves. This makes it even more difficult for them to access healthcare and often leads to missed appointments.

At MSF, many medical consultations relate to social work and administrative procedures. That is why 40% of their information sessions are about access to healthcare and contain more detailed explanations about the steps needed to obtain a Fedasil requisition form. This reflects the significant lack of information that applicants face. Based on the same findings, MdM also organised information sessions on access to healthcare at the Humanitarian Hub. The increasing complexity of applicants’ administrative situations (M status, subsequent applicant and other legal uncertainties) is a major obstacle to patients’ self-reliance and continuity of care.

In terms of mental health care, 61% of patients who come to the Hub for consultation are applicants for IP, and the service can only meet half of the actual demand. At the RMP, 92% of patients receiving psychological consultations are applicants for IP. At the Hub, the health team had one psychologist in the second half of 2025 instead of two as before. At the RMP, there was a decrease in the number of psychological consultations in November 2025, as there was only one psychologist instead of two during that period. This shortage of psychologists in these low-threshold services led to a reduction in available support and to periods during which people with mental health issues were unable to consult a psychologist. To strengthen mental health care, a third person was recruited at the RMP in December, expanding the team to 2 FTEs. MSF organized individual consultations and group sessions on mental health-related topics at their various intervention sites. These are squats, informal camps and NBMV centres where people who are excluded from the reception network and who find it difficult to access healthcare are taken in. 12% of those assisted were asylum seekers, most of whom were helped at Casa Tamam during the summer before MSF ceased its activities at this centre. In general, many organisations, such as the Humanitarian Hub, MdM and MSF, warn that mental health is deteriorating in their target groups.

SLEEPING ON THE STREETS: HEALTH CONSEQUENCES

In addition, living on the streets has health consequences. Housing is widely recognised as the most important non-medical factor for health.³⁵ On the field, MdM teams see the devastating effects of homelessness on health on a daily basis, such as the exacerbation of mental health problems due to the lack of a safe place to sleep, the difficulty of taking medication when living on the streets, etc.

Medically speaking, homelessness is associated with a higher prevalence of infectious diseases linked to precarious conditions, such as skin parasites, hepatitis B and C, tuberculosis and HIV.³⁶ At the Humanitarian Hub, most of the conditions diagnosed are related to living on the streets, poor housing or precarious living conditions. Skin conditions account for 12% of diagnoses and respiratory conditions for 8%. In addition, the Hub diagnoses various conditions resulting from a lack of access to hygiene and water. MSF shares these findings. In their projects, skin conditions, and more specifically scabies, are one of the main reasons for consultations. MSF improved general hygiene in the locations where they operate by organising health education sessions and donating hygiene products. In the summer of 2025, the Humanitarian Hub made 41 referrals for suspected tuberculosis, of which 15 cases were confirmed. Various organisations, such as MSF and MdM, have warned for this increase in the number of cases. Infectious diseases, such as tuberculosis, are more common among homeless people because they are forced to live in close quarters in unsuitable spaces with inadequate ventilation. The main factors contributing to this vulnerability include malnutrition, poor hygiene and a weakened immune system. Due to Belgium's non-reception policy, not all applicants for IP have access to medical examinations, including vaccinations and tuberculosis screening. Previously, these people underwent a systematic medical examination by Fedasil after submitting their application for IP to the Immigration Office. Due to the systematic refusal of reception places, applicants without reception are no longer automatically referred to medical dispatch. However, decent housing conditions are an important determinant of health. The lack of suitable housing solutions significantly increases the risk of exposure and infection with these diseases.

³⁵ Office of the United Nations High Commissioner for Human Rights (X). The Right to Adequate Housing. Factsheet No 21., <https://www.ohchr.org/en/special-procedures/sr-housing/human-right-adequate-housing> et World Health Organization (2018) WHO Housing and Health guidelines, 172p., <https://www.who.int/publications/i/item/9789241550376>.

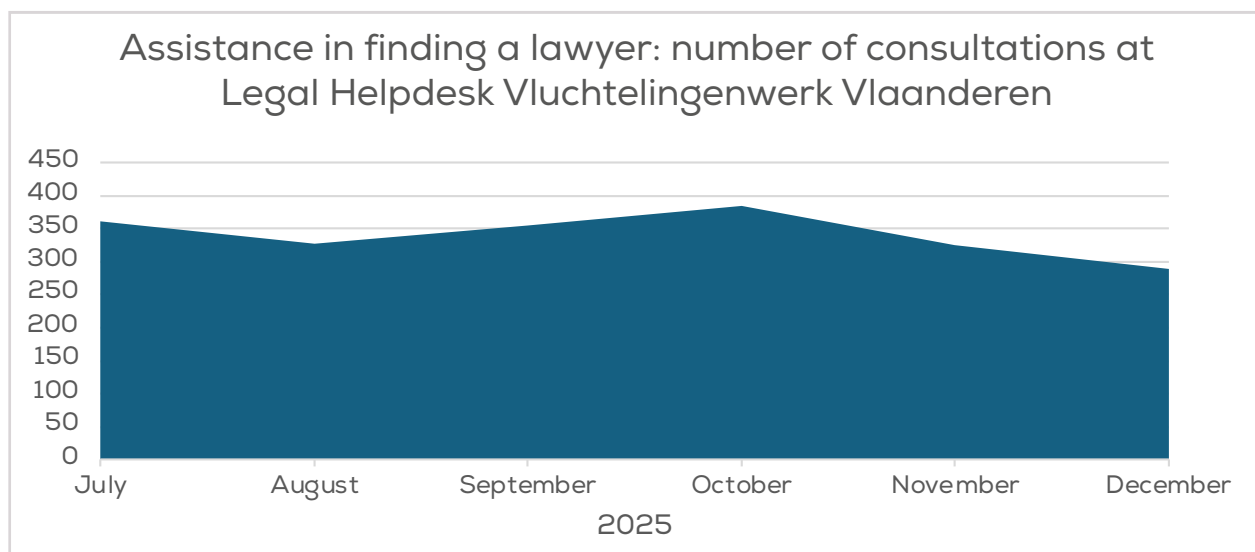
³⁶ Homelessness in Europe: Time to act. (2023). The Lancet Public Health, Volume 8(Issue 10), e743.

On a psychological level, numerous studies point to a mutual influence between homelessness and mental health³⁷. Various epidemiological studies show that depression, suicidal thoughts, traumatic symptoms and drug use are more common among homeless people than among people with a permanent residence³⁸. Not only do mental health problems worsen due to a lack of access to care, but these precarious living conditions also lead to the development of new conditions. At the end of 2025, the Humanitarian Hub organised focus groups on mental health. Several participants pointed out the feeling of insecurity that comes with living on the streets and the frequent thefts that make it impossible to leave your belongings anywhere. The lack of shelter, protection, uncertainty about the asylum procedure, disappointment about their living conditions and worrying are mentioned by several participants as the main sources of stress and fatigue. They also indicate that various factors can lead to serious mental illness or addiction to drugs and alcohol.

Almost all participants mention access to housing as one of the things that would help them psychologically. Respondents emphasise that psychological support must be accompanied by practical assistance, such as help in finding housing. At MSF, the most common symptoms among asylum seekers receiving individual psychological consultations are related to stress and trauma. This corresponds with the figures from MdM. MdM's CASO (Centre d'accès aux soins et d'orientation permanent) monitors people's mental health and diagnoses at least 48% of them with depression or anxiety disorders. Both MSF and MdM report cases of psychosis and drug use.

... It also includes access to legal aid.”

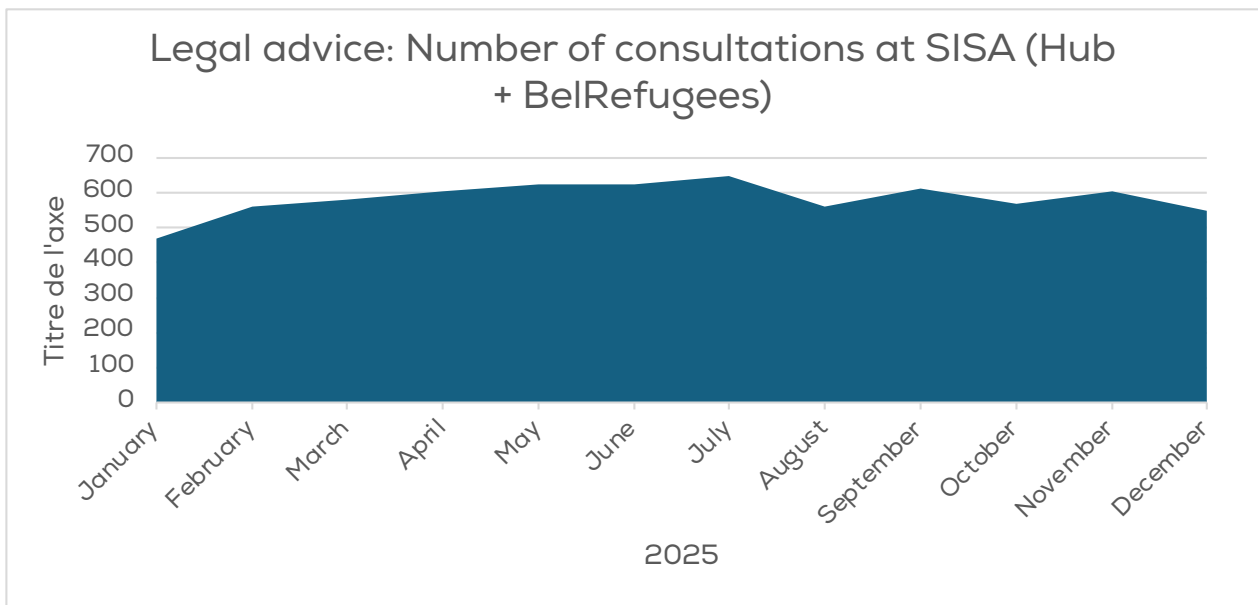
The Legal Helpdesk of Vluchtelingenwerk Vlaanderen receives applicants for IP without accommodation seeking legal assistance on Mondays, Wednesdays and Fridays. Between July and December 2025, the helpdesk received 2,044 visitors. The demand for shelter is their most urgent concern, with 488 visitors stating that they were homeless at the time of their visit. These were mainly people who had only just submitted an application for IP and had not yet gained access to the Fedasil reception network. More than a quarter of homeless visitors are also unaware of the waiting list for shelter, so the Legal Helpdesk assists them with registering on the waiting list.



³⁷ Laporte, A., Le Mener, E., & Detrez, M. (2011). The mental health of homeless people: Findings and recommendations from a survey in mainland France. Homeless in Europe, Feantsa.
³⁸ Padgett, D. K. (2020). Homelessness, housing instability and mental health: making the connections. BJPpsych Bulletin, 44(5), 197-201. <https://doi.org/10.1192/bjb.2020.49>.

The changes to the Reception Act also had an impact on the Helpdesk. In August, the Helpdesk received the first families with a Greek protection status. One of them consisted of two adults and three children aged four, three and two. In some cases, the Helpdesk was able to find emergency accommodation in collaboration with Brussels partner organisations and volunteers. Unfortunately, it was not always possible to find a solution, which meant that several families with children had to spend the night on the streets. Through the Helpdesk, these families initiated proceedings before the Brussels Labour Court, which ruled against Fedasil. Initially, the federal Reception Agency ignored these rulings on the instructions of the minister. Only after weeks of political and social pressure did the minister change her mind and instruct Fedasil to respect these legal rulings after all.

At BelRefugees, the legal service received an average of 600 people per month. 72% of the people who consulted the service were applicants for IP.



Conclusion

The non-reception policy was far from over in 2025, but continued unabated. Moreover, the Arizona government crossed a red line: in addition to single men applying for IP, families with sometimes very young children also ended up on the streets.

Civil society, as well as Belgian and international institutions, continue to call on Belgium to take action and measures to end this situation, which has been ongoing since 2021. However, the government is doing the exact opposite. The legislative changes adopted in the summer of 2025 exclude new categories of applicants and exacerbate the humanitarian situation. The number of reception places in the Fedasil network is decreasing. However, the need for reception places remains high. At the end of 2025, at least 2,000 people still needed a place.

In practice, non-governmental and humanitarian organisations are still compensating for the shortcomings of the Belgian state. This is proving difficult: the emergency reception network is becoming overburdened, some services are receiving too many requests and others are having to cut back on their activities due to budget cuts. At the same time, asylum seekers are entitled to basic rights, such as access to clothing, food, medical and psychological care, and legal assistance. This support should come from Fedasil, which should not pass on this responsibility to NGOs.

Thousands of court rulings oblige Fedasil to accommodate applicants, but the government is not adjusting its policy. This is increasing the tension between the executive and the judiciary. This situation highlights what really matters: respecting people's fundamental rights and protecting the rule of law.

We continue to emphasise: solutions exist. The Committee of Ministers of the Council of Europe, the UNHCR, Myria, FIRM and organisations in the field have clearly identified them. They call for dignified reception to be guaranteed, reception capacity to be structurally increased with an adequate budget, court rulings to be complied with, the link with social assistance to be maintained and a distribution plan to be activated.

As long as the waiting list remains, people sleep on the streets and the state refuses to implement court decisions and take urgent structural measures, there is a deliberate policy of non-reception. In doing so, the Belgian state is deliberately violating its international obligations.

The continuation and tightening of this policy is unacceptable.



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