

Statelessness, Migration, and Education: A Comparative Analysis of Policy Frameworks and Support Strategies in Thailand and Hungary

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Inclusion in education is a critical educational phenomenon, as successfully involving children from diverse backgrounds requires looking beyond numbers and socio-economic status. The role of teachers and education specialists is to understand students' origins and the challenges they face. This becomes particularly complex when children have a vulnerable status due to their ethnicity or legal standing. Stateless and migrant children are especially at risk of being denied proper educational opportunities, despite the UN Convention on the Rights of the Child (United Nations, 1989) requiring equal opportunities for all children globally. This study examines two groups of children in different regions of Europe and Asia: stateless children in Northern Thailand and migrant children from Ukraine in Hungary. By analysing existing scientific data and literature, we provide a comparative assessment of their educational situations and offer recommendations to improve their inclusion in educational systems.

Keywords: stateless children, refugees, Inclusion, Human rights, Minority education

Preface and Statements for an Inclusive Education System in Thailand and Hungary

In accordance with the Index for Inclusion (Booth & Ainscow, 2002), inclusion in an educational environment requires reducing barriers to learning and participation for all students. This can be achieved by building collaborative relationships, improving the learning and teaching environment, encouraging active student involvement in learning by integrating the curriculum with lived experience, and creating supportive and stimulating environments for both staff and students that build communities that encourage, support, and value achievements (Endrődy et al., 2024).

Rónay (2019) argues that addressing migration in educational settings is essential for helping pupils distinguish between real and perceived dangers while facilitating the social integration of disadvantaged migrant children and their families. This requires consideration of both the tools and the inclusive community structures necessary to support these students (p. 183). Therefore, examining the educational situation of migrant and stateless children is critical.

In Hungary, several policies emphasize the importance of inclusive education: the Act CXC of 2011 on National Public Education, which addresses the national education system; Decree 229/2012 (VIII. 28.) of the

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Government on implementing this Act; and directives concerning special educational needs (SEN) and minority children's education, available through the National Education Office (National Education Office, 2026). As Ainscow, Booth, and Dyson (2006) note, inclusive education must offer equal opportunities (Mohai et al., 2020). These directives aim to ensure educational access for all children, regardless of background.

In Thailand, the B.E. 2560 (2017) Constitution mandates the state to provide free, quality education for every child from preschool through compulsory education. It further prohibits any forms of discrimination on the grounds of differences in origin, race, language, sex, age, disability, physical or health conditions, personal status, economic or social standing, religious belief, education, or constitutional or political views. The 1999 National Education Act (amended in 2002) reaffirms the right to quality, free education for all. As of 2025, efforts continue through partnerships such as UNESCO and the Equitable Education Fund (EEF), established under the 2018 Act, to reduce inequality through various initiatives and projects focused on teacher preparation and professional development (Laizans & Dzerviniks, 2025; UNESCO, 2011, 2025).

Context of Thailand

Statelessness and migration in Thailand are complex, closely linked phenomena. They shape the lives and futures of hundreds of thousands, especially children. These children often have precarious legal and social identities. Thailand hosts one of the largest stateless populations in the world. Over half a million registered stateless persons reside mainly in border provinces like Tak, Chiang Mai, and Chiang Rai. Many children in this group attend Thai public schools, even though they lack formal citizenship documentation. This leaves them exposed to many vulnerabilities in education and society (Phuaphansawat & Nasee, 2025, pp. XII–XVII).

Stateless Children's Education in Thailand

The context of statelessness in Thailand is defined by a complex policy environment that seeks to balance national security concerns with human rights principles, creating significant challenges in ensuring educational equity for non-national children. Thailand's approach to providing access to education for stateless children and youth is considered advanced in terms of its doctrinal foundations and intentions compared to those of other ASEAN countries (Rostam et al., 2022; Selvakumaran, 2020). This foundation is built upon constitutional guarantees, as the Constitution B.E. 2560 (2017), Section 49, states that "every person" shall enjoy equal rights to receive at least twelve years of comprehensive and quality public education free of charge. A pivotal moment in implementation was the Cabinet Resolution of July 5, 2005, which sought to expand educational provision for persons without civil registration evidence or Thai nationality (MOE, 2017, p. 16). The target population for these efforts includes over 259,055 registered stateless children and youth (comprising those assigned identification numbers starting with 7 (descendants of ethnic minority groups born in Thailand), 0 (persons with legal status problems), and G-code (school-aged children enrolled in school without Thai nationality or civil registration evidence) (Phuaphansawat & Nasee, 2025, p. 8).

However, the effectiveness of these progressive educational policies is constantly undermined by what has been characterised as "Thailand's policy paradox" (Park et al., 2009; Selvakumaran et al., 2020). This stems from a lack of coherence between the frameworks established by educational authorities and the restrictive regulations enforced by security and administrative agencies (Phuaphansawat & Nasee, 2025, p. XII). This misalignment creates tension, leading to inconsistencies and confusion among practitioners about whether state-

less persons should be viewed primarily as a vulnerable group requiring urgent protection or as a security risk whose rights should be constrained (Park et al., 2009; Selvakumaran et al., 2020).

Categories of Stateless Children and Youth in Focus

This section highlights the core population of stateless children and youth targeted for educational support in Thailand, categorised by their identification status, and critically links the persistent challenges they face to the complex and fragmented management of their basic human rights by the Royal Thai Government (RTG). In Thailand, stateless children and youth can be divided into three administrative categories based on their identification status. These groups lack Thai nationality but have some form of registration or recognition by Thai authorities.

1. ID numbers starting with 7 (descendants of ethnic minority groups born in Thailand): These individuals are descendants of ethnic minority groups who were born in Thailand. Their ancestors (usually the grandparent generation) were often assigned ID numbers starting with 6 because they were recognised as ethnic minority groups. ID number 7 specifically refers to “children of aliens born in Thailand.” This group is generally in a better position regarding legal status because the RTG recognises them as “ethnic minorities” who have established themselves within the country. Consequently, they can request permission to travel outside controlled areas for educational purposes under the Ministry of Interior’s 2010 regulation (MOI, 2010).

2. ID numbers starting with 0 (persons with legal status problems who have no ties with another country and have been registered by the RTG): They are individuals who have been living in Thailand for more than six months, hold no ID card or birth certificate, were found through a state survey, and are recognized as residents by leniency, but are not granted Thai nationality. This group resulted from the RTG adopting a strategy in 2005 to address rights and legal status issues by assigning identification numbers starting with 0 (subgroups 0-89 and 0-00) to undocumented persons or those whose lineage could not be verified. Although they are recognised for leniency, they face significant restrictions; for example, they can only request permission to leave controlled areas after being registered for 5 years.

3. G-code (school-age children without Thai nationality or civil registration evidence): G-code students are school-age children or youth enrolled at a Thai educational institution who do not have Thai nationality and are unable to present any civil registration evidence. The G-code system, developed by the Ministry of Education (MOE), is an important and innovative policy tool that grants these children a 13-digit ‘learner ID’ and gives them the right to access educational services in Thailand, even without legal status. The G-code status is intended to facilitate students’ transition toward obtaining legal status, typically ID 0-00, through coordination between schools and the Ministry of Interior (MOI) district offices (Phuaphansawat & Nasee, 2025, p. 87–93; Transborder News, 2023). While the MOE’s G-code system is an innovative tool that grants educational access, these children face the most significant limitations among all stateless groups. They are not permitted to travel outside the vicinity of their primary school, which severely limits their ability to progress to secondary education (Chuntong, 2010; Paisanpanichkul et al., 2020, pp. 31–32; Park et al., 2009, p. 542; Phuaphansawat & Nasee, 2025, p. 9).

Policy Framework and Regulatory Design

This section highlights a fundamental contradiction within the RTG policy framework concerning stateless persons. It was found that while the RTG has adopted progressive policies aligned with international human rights standards, the actual implementation is constantly undermined by security-driven regulations (Park et

al., 2009; Selvakumaran et al., 2020). This tension creates confusion among officials and stakeholders regarding the appropriate treatment of stateless children and youth, leaving them uncertain about whether this population should be viewed as a vulnerable group requiring urgent protection or as a security risk whose rights should be restricted (Phuaphansawat & Nasee, 2025, p. V).

1. The security and restrictions focus: Policies driven by security concerns focus primarily on national safety, border control, and the potential threat posed by undocumented populations, resulting in restrictive measures that directly impede the rights of stateless individuals. For instance, the National Security Policy and Plan (2023-2027) addresses “illegal immigrants and irregular migrants” by proposing to expedite databases and enforce relevant laws for investigating and arresting illegal alien workers (Office of the National Security Council, 2022, p. 5). This plan explicitly tasks the Internal Security Operations Command (ISOC), a military agency, as the focal point for achieving these objectives (Office of the National Security Council, 2022, pp. 5, 60). Furthermore, the MoI’s regulations on temporary travel permits for educational institutions, issued in 2020, are designed from a security perspective, not human rights or equity concerns (Phuaphansawat & Nasee, 2025, pp. 24-25). They require stateless children to obtain complex, multi-level authorization to travel outside their controlled districts for school, which makes them feel like criminals (Phuaphansawat & Nasee, 2025, p. 25). The issues are deepened by negative perceptions from security agencies that sometimes view stateless children as “using the school as a stepping stone” or a “door” to secure identification and eventually Thai nationality, rather than genuinely pursuing education (Phuaphansawat & Nasee, 2025, p. 92).
2. Human rights and progressive focus: On the other hand, policies driven by human rights concerns are rooted in international commitments and progressive domestic resolutions aimed at ensuring fundamental rights, especially education, regardless of status. Thailand has endorsed numerous international agreements protecting the right to education for stateless children, including the Convention on the Rights of the Child (CRC) and the Universal Declaration of Human Rights (UDHR) (Phuaphansawat & Nasee, 2025, pp. 11-14). Domestically, the Constitution B.E. 2560 (2017) guarantees the right of “every person” to receive at least twelve years of comprehensive and quality education free of charge (Phuaphansawat & Nasee, 2025, p. 22). The Cabinet Resolution of July 5, 2005, was a pivotal moment for expanding educational provision for persons without civil registration evidence, and the MoE’s development of the G-code system is an innovative tool that grants these children a ‘learner ID’ to access services even without legal status. Even the National Security Policy itself contains clauses reflecting human rights concerns, such as the strategy to provide protection and welfare for those with problematic status (Office of the National Security Council, 2022, p. 5, 60).

Stateless Children and Youth Educational Pathways in Thailand

Apart from formal schooling, the RTG employs specialised educational pathways to manage and support access for stateless children and youth, particularly through Non-Formal Education (NFE) systems under the Department of Learning Encouragement (DOLE). DOLE programs offer greater flexibility in curriculum design, scheduling, and location compared to formal schooling. This makes them highly suitable for stateless youth who often face economic pressure and need to work to support their families (Phuaphansawat & Nasee, 2025, pp. 69-77). Notable pathways include the “200-hour Thai Literacy Promotion Course,” which is adapted for children whose mother tongue is not Thai. There are also localised programs, such as the Thai Literacy Promotion Program for the Jahai ethnic group in the southernmost provinces, unofficially known as the “Survival in

the (New) Society” Curriculum. This curriculum focuses on practical communication, numeracy, and social etiquette (Phuaphansawat & Nasee, 2025, pp. 70–77).

The DOLE also operates Mountain People Learning Promotion Centres and has previously collaborated with Migrant Learning Centres (MLCs) to deliver curricula. This includes the Basic Education curriculum (equivalent to the national curriculum) for youth aged 15 and older, allowing them to obtain the certificates needed for tertiary education (Phuaphansawat & Nasee, 2025, pp. 68-69). Furthermore, high-achieving stateless students have found limited, yet existing, support in Higher Education Institutions (HEIs). Some institutions have implemented proactive measures, such as modifying scholarship criteria to remove the Thai nationality requirement and establishing “legal clinics” to assist students with legal status verification, including Thammasat University, Chiang Mai University, and Mahachulalongkornrajavidyalaya University (Chiang Mai Campus). These flexible and specialised educational routes are essential for sustaining access for stateless populations beyond the basic education system, especially since they cannot access key financial aid, such as the Student Loan Fund (SLF) (Phuaphansawat & Nasee, 2025, pp. 62, 83–84).

Fragmentation of Basic Human Rights Management

Statelessness in Thailand is closely linked to the Thai government's fragmented approach to managing basic human rights. Despite significant progress in granting access to education, limitations in other fundamental rights hinder the full realisation of the educational investment made by the individual and the state (Phuaphansawat & Nasee, 2025, p. XII). This fragmentation manifests in three key areas where rights are disconnected:

1. Education rights granted before legal status: The use of the G-code ensures educational access regardless of legal status. However, the process of developing legal status is complex, protracted, and burdensome, often lasting throughout a child's school life (Phuaphansawat & Nasee, 2025, p. 87-91, 102). Furthermore, the process of personal status verification is slowed by fragmented population databases managed by different agencies (the Immigration Bureau, the Department of Provincial Administration, and the MoE) rather than a consolidated system. Delay in the verification process means that rights tied to formal registration (such as healthcare access granted by the ID 0-00 card) are denied for the period before the card is issued.
2. Education rights provided without the right to travel: The right to education is severely limited by security-driven regulations on freedom of movement imposed by administrative and security agencies. Most stateless children must request permission every time they need to travel outside their controlled areas (Phuaphansawat & Nasee, 2025, pp. 97-98). This is particularly problematic for secondary and tertiary education, as these institutions are more concentrated in certain districts. In addition, the MoI's 2020 regulation regarding temporary travel permits for educational institutions requires complex, multi-level authorisation (village head, district chief officer, provincial governor), which can take considerable time. This causes delays and imposes an unnecessary burden on students (Phuaphansawat & Nasee, 2025, pp. 24-25).
3. Education allowed without financial or career rights: Access to education is undercut by prohibitions on accessing financial aid and subsequent employment restrictions (Phuaphansawat & Nasee, 2025, pp. 84-85). In Thailand, stateless students, regardless of their academic achievements, are ineligible to apply for loans from the Student Loan Fund (SLF), as the legislation stipulates that only Thai nationals are eligible for educational loans. This acts as a significant barrier to higher education (Phuaphansawat

& Nasee, 2025, pp. 36, 83-84, 94). Furthermore, even after completing education beyond the secondary level, stateless graduates face disadvantages in the labour market. They are classified as “aliens” under the Immigration Act 1979. This act requires them to apply for alien work permits, which is a bureaucratic hurdle that often leads employers to prefer hiring Thai nationals. Importantly, they are prohibited from holding civil service positions (Phuaphansawat & Nasee, 2025, pp. 84-85).

This section captures the reality that while Thailand has made strides in ensuring educational access for specific stateless groups (ID 7, 0, and G-code), the fragmented approach means that crucial human rights, such as freedom of movement, financial aid, and career prospects, are not integrated with their educational access. These restrictions ultimately limit the potential benefits of the education received, both for the individuals and for the Thai state (Phuaphansawat & Nasee, 2025, p. XVII). Metaphorically, it is like a beautifully designed building (education) that a community is invited to use, but the connecting roads leading to it (travel rights) are constantly blocked by security checkpoints, and the job market upon exiting the building (career rights) only accepts those with a specific ID card (nationality), denying the graduates the economic power to fully realize their acquired skills.

As demonstrated above, the complexity of both the situations and the legislation requires further assistance and analysis. Full implementation of international treaties should have been prioritised long ago; however, meaningful change remains possible. While the situation of stateless children in Thailand requires greater awareness and action, migration has created similar tensions within Hungary's compulsory education system. Both contexts demand particular attention from policymakers to ensure inclusive educational access for vulnerable children.

Some Aspects and Risks of Statelessness in the European Union

While statelessness is not a common issue in Hungary as part of the European Union, similarities emerge in the lack of inclusive practices and strategies in response to recent humanitarian crises, particularly the Ukrainian refugee crisis of 2022. Before examining this crisis, it is important to address recent EU policies on statelessness and the Union's approach to such situations.

Although efforts to reduce statelessness remain strong, rising tensions between Russia and Ukraine have a potential risk: refugees from these countries may opt for stateless status rather than maintain citizenship of war-affected nations, which might seem almost impossible (OIF, 2026). Additionally, the risks of becoming stateless involuntarily through war-related legal or policy changes warrant serious consideration. These potential risks necessitate examination of the most likely pathways to statelessness in recent years.

Within the EU, most stateless children originate from countries with existing stateless populations or belong to highly vulnerable ethnic minorities, such as the Roma population. Another contributing factor involves children born to parents registered in now-defunct states, such as the former Yugoslavia or the Soviet Union, resulting in approximately 10,000 cases. Regarding these political transformations, Ukraine registered over 17,500 stateless children in the 2001 census (UNICEF, 2019, p. 2). These factors underscore the need to examine how the migration crisis has significantly affected both Hungarian education and the broader political landscape.

History and Education of Ukraine

Ukraine became an independent state following the dissolution of the Soviet Union in 1991, subsequently developing its own education system and political framework. Located in Eastern Europe, Ukraine borders Russia, Belarus, Poland, Slovakia, Hungary, Romania, Moldova, and the Black Sea. It is the second-largest country in Europe by area, with Kyiv as its capital.

On February 26, 2014, Russian troops seized control of the Crimean region, and on February 24, 2022, Russia launched a full-scale invasion of Ukraine. Since then, millions of Ukrainians have fled to neighbouring countries. Hungary has served as both a transit and destination country, particularly due to the relatively large Hungarian population in Transcarpathia—a region with long-standing historical, cultural, and linguistic ties to Hungary (Pallay, 2024).

The majority of Ukrainian refugees in Hungary are women and children, predominantly coming from Transcarpathian and various Hungarian-speaking communities. While shared language might facilitate integration, it does not guarantee successful inclusion (Johnston, 2025; Korkut, 2023; Roszik-Volovik, 2023).

Recent Research on Ukrainian Refugees and Children in Hungary

According to the Operational Data Portal, by the end of August 2022, 28,289 persons from Ukraine had registered for Temporary Protection in Hungary. In comparison, neighbouring countries received significantly higher numbers: Slovakia (86,834), Romania (50,857), the Czech Republic (408,846), Poland (1,274,130), and Germany (670,000) (Boreczky et al., 2022). Although Hungary shares a border with Ukraine, it typically serves as a transit country rather than a final destination during such crises. (Almost 6 million people also stayed in Ukraine as internally displaced people (IDPs); their statistics, status, and situation can be read in Molnár et al., 2023.).

Korkut and Fazekas observe that Hungary's response to the 2022 Ukrainian refugee crisis contrasted sharply with its exclusion-oriented strategy during the 2015 Middle Eastern migration crisis. The earlier response focused on constructing border fences and establishing transit zones, whereas the Ukrainian influx was managed through the EU Temporary Protection Directive and charitable organisations. This shift can be attributed to ethnic kinship ties with Hungarians in Transcarpathia and the government's policy of neutrality regarding the war. Those who arrived from inner Ukraine, cities, and regions affected by war could apply for refugee status. Notably, Hungary did not institutionalise reception policies, and state support remained minimal.

NGOs and volunteers provided assistance rather than relying on well-organised state support (Korkut & Fazekas, 2023). Notably, a new type of shelter emerged in both Hungary and Poland: public libraries offered a range of support to refugees, including shelter, food, psychological assistance, and administrative aid (job searches, school enrollment, ID registration). Later, libraries focused on language learning, literacy, and cultural integration. In Poland, libraries provided long-term support, while in Hungary, services were primarily directed toward transit migrants and those with Hungarian backgrounds (Johnston et al., 2024). These emerging support structures warrant closer examination.

Recent literature reveals key factors related to Ukrainian refugees and Hungary's management of the refugee influx. Several studies indicate that social support and integration mechanisms for refugees are generally weaker in Hungary than in Poland, primarily due to differences in host-country policies and available resources (Kovács, 2023; Korkut, 2023; Garayova, 2025). While Hungarian law grants Ukrainian refugee children

access to free public education on equal terms with Hungarian citizens, enrollment remains low due to language barriers and the availability of online Ukrainian education (Garayova, 2025).

Roszik-Volovik, Korkut, Johnston, and their research partners found that in Hungary, NGOs, various foundations, and community groups- rather than the government-provide support to refugees, primarily focusing on psychological, educational, and recreational assistance for Ukrainian children (Johnston, 2025; Korkut, 2023; Roszik-Volovik, 2023).

Roszik-Volovik and colleagues highlighted that helpers face potential risks of burnout due to the sudden intensity of migration, inadequate preparation, and anxiety experienced by both helpers and refugees. While volunteers attempted to prioritise the needs of incoming refugees, the risk of overlooking essential services remained constant. Volunteers experienced strong emotional involvement, stress, guilt, and even vicarious traumatising, requiring maximum flexibility as they navigated blurred boundaries between personal and professional roles (Roszik-Volovik, 2023). Although this situation fostered greater understanding of refugees, it also carried the risk of volunteer attrition. According to Pally and colleagues, interestingly, those who worked on the border and in the Transcarpathian region with the internally displaced people (IDP) in Ukraine, „the activity has generally increased volunteers' well-being”, and all mentioned that they would offer to help again anytime. It seems that, as a side effect, it boosted the likelihood of volunteering in Transcarpathia (Pally et al., 2024, p. 49).

Garayova and colleagues examined Slovakia, Czechia, Hungary, and Poland, finding that while legal standards exist- such as the UN Convention on the Rights of the Child and the EU Temporary Protection Directive- implementation faces significant challenges regarding compulsory schooling and consistent protection for all refugee children. Key obstacles include discrepancies between law and practice, capacity constraints in education systems, language barriers, lack of psychosocial support, inconsistent guardianship for unaccompanied minors, and risks of statelessness and uncertainty surrounding long-term integration. Their article underscores the importance of legal reform, policy measures, and effective translation of legislation into practice (Garayova, 2025).

In a separate study of 728 adult refugees, participants from Poland reported higher social support and stronger integrative attitudes than those in Hungary; however, 44% of refugees in both countries experienced severe PTSD. This research indicated that linguistic similarity created fewer barriers in Poland compared to Hungary (Kovács et al., 2023).

According to data gathered by UNHCR, thousands of Ukrainian refugee children across Europe remain out of school or rely primarily on online education. Secondary education students are more likely to continue their studies online, while primary-age students, particularly those aged 5 to 11, are more likely to enrol in host-country education systems. Notably, pre-primary education enrollment is particularly low, which may negatively affect students' future educational trajectories and potentially lead to higher dropout rates (UNHCR, 2024). However, secondary students who continue their education remotely face risks of structural exclusion due to physical distance from peers, lack of social interaction, and other contextual factors. Consequently, all refugee children face educational vulnerabilities, though in different forms.

In Hungary specifically, data reveal that among Ukrainian children who have spent less than 12 months in the country, only 13% attend the Hungarian education system, with most in transit to other destinations. Among this group, 53% are enrolled in the Ukrainian online education system (UNHCR, 2024, p. 13). This raises questions about the educational status of the remaining children. For those who have resided in Hungary for more than 1 year, enrollment patterns shift: 43% enrol in Hungarian schools, while participation in Ukrainian online education drops to 12%.

Some Solutions in Hungary for Schooling Ukrainian Children

As noted above, NGOs and individuals offered immediate assistance to refugees. Some kindergartens, particularly in Budapest, opened dedicated groups for Ukrainian students. The ELTE PPK IPE (Eötvös Loránd University, Faculty of Education and Psychology, Institute of Intercultural Psychology and Education) quickly developed guidance on managing the situation, as most teachers and schools appeared unprepared for the sudden influx of refugee children.

Their paper examines the diverse backgrounds of Ukrainian refugee students, including linguistic and cultural differences and religious diversity, and compares the Ukrainian and Hungarian education systems to help educators understand what to expect. The authors emphasise that these children require support in addressing the trauma they have experienced, language barriers, and cultural challenges. Additionally, they offer strategies to facilitate communication and highlight teachers' critical role in fostering the inclusion of refugee and asylum-seeking children (Boreczky et al., 2022). While other similar resources exist, this publication provides the most comprehensive examination of the topic.

Meanwhile, the first dedicated Ukrainian school opened in Budapest (UMDSZ, 2025), with plans for another in Nyíregyháza, the largest city near the Ukrainian border. According to the UMDSZ portal, the school enrolls 350 students and is fully funded by the Hungarian government. It provides a curriculum that meets Ukrainian educational standards, with Ukrainian as the language of instruction. After completing its first two semesters, the school now operates from its own building in Csepel.

Another educational option is the Lesya Ukrainka school, which provides supplementary minority education for Ukrainians. Founded in 2023 for Ukrainian children staying temporarily or permanently in Hungary, it operates in three locations: Budapest, Nyíregyháza, and Miskolc (Lesya Ukrainka School, 2025).

While these institutions enable Ukrainian children to continue their studies in their mother tongue, comprehensive support remains necessary for all refugee and asylum-seeking children, including those enrolled in Hungarian schools. Having examined the Hungarian context, we now turn to a comparative analysis of practices in both countries.

Discussion

The Conflict Between Progressive Doctrine and Restrictive Execution

While both nations possess advanced legal frameworks intended to ensure educational access, a policy paradox exists wherein progressive doctrine is consistently undermined by restrictive implementation. In Thailand, the Constitution B.E. 2560 (2017) guarantees education for all persons, supported by the Ministry of Education's (MOE) G-code system, which grants learner IDs to undocumented children. However, this framework is obstructed by security-driven agendas, specifically the National Security Policy and Plan (2023-2027), which tasks the Internal Security Operations Command (ISOC) with arresting undocumented migrants. This creates a paradox wherein children are simultaneously viewed as vulnerable populations requiring protection and as security risks requiring surveillance.

Similarly, Hungary's Act CXC of 2011 on National Public Education and adherence to the EU Temporary Protection Directive theoretically ensure free public education for Ukrainian refugees. Yet lived experiences remain precarious due to discrepancies between law and practice. Unlike Thailand's active security obstruction, Hungary's barriers stem from a lack of state-institutionalised reception policies, resulting in low enrollment driven by

capacity constraints and linguistic and cultural barriers. However, progress has occurred: in the past two years, supplementary schools and a full-time Ukrainian school have opened to serve refugee children in Hungary.

In both contexts, legal standards for compulsory schooling exist, but implementation is impeded by competing national priorities-security concerns in Thailand and resource allocation challenges in Hungary.

Fragmentation of Rights: Education in Isolation

Educational rights in both countries are granted in isolation from other necessary civil and social rights, rendering the investment fragmented and creating invisible barriers to the inclusive ideal described in the Index for Inclusion. In Thailand, this fragmentation is structural: students may enter classrooms via the G-code system but are prohibited from accessing the Student Loan Fund (SLF) due to nationality requirements. Furthermore, their physical mobility is severely restricted by the Ministry of Interior regulations, which require complex multi-level authorisation for educational travel. This effectively blocks pathways to secondary and tertiary education.

A similar fragmentation occurs in Hungary, echoing the challenges in Thailand. In Thailand, bureaucratic and physical barriers limit access, while in Hungary, the state allows legal access to classrooms but lacks the necessary support structures. Hungary does not provide consistent guardianship for unaccompanied minors, nor enough linguistic support or psychosocial care. In Thailand, barriers appear as checkpoints restricting movement and financial access. In Hungary, policy and resource deficiencies create obstacles. As a result, refugee children may attend classes but remain socially and psychologically isolated. They mainly rely on volunteers and NGOs with limited funds, including public library initiatives mentioned earlier.

State Reliance vs. Institutional Responsibility

The burden of managing these policy tensions falls disproportionately on non-state actors and frontline personnel rather than centralised institutions. In Thailand, the tension is inter-agency, leaving school administrators and teachers to navigate conflicting mandates as de facto registrars, often uncertain whether they are protecting a child or violating the Immigration Act by harbouring aliens. In contrast, Hungary's tension manifests as excessive reliance on civil society; the government's minimal state support has compelled NGOs, public libraries, and volunteers to provide essential services- such as shelter, food, administrative assistance, and mental health support- that the state framework promises but fails to operationalise.

The human cost of these gaps is distinct yet parallel: in Hungary, volunteers experience vicarious traumatization and burnout from managing a crisis without professional boundaries or state support, while in Thailand, stateless youth endure lifelong anxiety regarding their legal status- a precarious situation that extends well beyond their schooling years. Thus, in both nations, the state's failure to fully assume institutional responsibility transfers the emotional and logistical burden of inclusion onto vulnerable communities and their direct helpers. The discussion is summarised in the following table. (Table 1.)

Feature	Thailand	Hungary
Legal Framework	Constitution B.E. 2560 (2017) and Ministry of Education's G-code system (IDs for undocumented children).	Act CXC of 2011 (National Public Education) and the EU Temporary Protection Directive.
Primary Implementation Barrier	Security-driven agendas: National Security Policy and Plan (2023-2027) and the Internal Security Operations Command (ISOC).	Institutional deficiencies: Lack of state reception policies, capacity constraints, and linguistic/cultural barriers.
The Paradox	Children are viewed simultaneously as vulnerable populations needing protection and security risks requiring surveillance.	Legal access exists theoretically, but lived experiences remain precarious due to a lack of support structures.
Fragmentation of Rights	Structural barriers: Students have classroom access but are barred from the Student Loan Fund (SLF).	Support barriers: Lack of guardianship for minors, linguistic integration, and psychosocial care for trauma.
Physical Mobility	Highly restricted: Ministry of Interior requires complex authorization for educational travel, blocking higher education paths.	Not specifically mentioned as a primary barrier (focus is on social/psychological isolation).
Support Systems	Heavily obstructed by bureaucratic and physical checkpoints.	Relies primarily on volunteers and NGOs with limited funding (e.g., initiatives in public libraries).
Nature of Exclusion	Bureaucratic and security-driven: Focuses on checkpoints and financial/travel restrictions.	Policy and resource-driven: Results in social and psychological isolation of refugee children.

Table 1. Made by Pisith Nasee – Orsolya Endrődy, 2026

Conclusion

Although inclusion is widely referenced in Hungarian educational policy, the concept is less developed than in Ainscow and Booth's model (Endrődy et al., 2024). Policy mainly addresses children with special educational needs (SEN) and recognised minorities: German, Serbian, Slovakian, Slovenian, Greek, Croatian, Polish, Ukrainian, Bulgarian, Romanian, Rusin (Ruthenian, distinct from Russian), Armenian, and Roma (2011/CLXXIX). Researchers tend to apply Ainscow and Booth's broader conception in Hungary (Böddi et al., 2025; Fehérvári & Varga, 2023; Endrődy et al., 2024). Policymakers should use this broader framework for legislation.

This research has several limitations. The scope focuses on only two countries—Thailand and Hungary—which, while both grounded in democratic values, differ significantly in their governmental structures (a constitutional monarchy in Thailand versus a republic in Hungary). Moreover, the Thai analysis relies on case studies, whereas the Hungarian analysis is limited to a literature review of papers published since 2022, creating methodological asymmetry. Given these distinctions, future research should pursue multiple directions, most importantly, a deeper analysis of both countries' situations using primary data collection. Such research would provide empirical evidence to complement the existing literature and case study approaches.

Although both countries legally guarantee every child's right to education regardless of nationality or status, a different reality often emerges. Stateless children frequently remain invisible in legislative frame-

works. To address this, policy recommendations must ensure lawmakers fully recognise research. Further, enforcing international agreements—especially the UN Convention on the Rights of the Child—is needed to close the gap between law and lived experience.

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Hontalanság, migráció és oktatás: a thaiföldi és a magyarországi szakpolitika és támogatási stratégiák összehasonlító elemzése

Az inklúzió kritikus jelentőségű az oktatásban, a különböző háttérrel rendelkező gyermekek sikeres bevonása érdekében fontos, hogy ne kizárólag a statisztikai adatokra és a szocioökonómiai státuszra figyeljünk. A tanárok és az oktatási szakemberek feladata, hogy megértsék a tanulók származásának szerepét és az előttük álló ezzel kapcsolatos kihívásokat. Különösen bonyolult lehet egy gyermek helyzete, ha etnikai hovatartozása vagy állampolgársági státusza miatt kiszolgáltatott helyzetben van. A hontalan és migráns gyermekek fokozottan vannak kitéve annak a veszélynek, hogy megtagadják tőlük a megfelelő oktatást, annak ellenére, hogy az ENSZ Gyermekjogi Egyezménye (Egyesült Nemzetek, 1989) világszerte egyenlő esélyeket ír elő minden gyermek számára. Ez a tanulmány két gyermekcsoport helyzetét vizsgálja Európa és Ázsia két régiójában: a hontalan gyermekekét Észak-Thaiföldön és az Ukrajnából származó migráns gyermekekét Magyarországon. A meglévő tudományos adatok és szakirodalom elemzésével hasonlítjuk össze az érintettek oktatási helyzetét, valamint ajánlásokat fogalmazunk meg beilleszkedésük érdekében.

Kulcsszavak: hontalan gyermekek, menekültek, inklúzió, emberi jogok, kisebbségi oktatás