

# Preventing human trafficking of refugees from Ukraine

A rapid assessment of risks and gaps in the anti-trafficking response

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**La Strada International** is a European NGO platform against human trafficking that works from a human rights perspective in support of trafficked persons. The platform aims to prevent human trafficking and to protect and realise trafficked persons' rights. This is done by providing access to adequate assistance and support to victims, and via information and knowledge exchange, capacity building of NGOs and other stakeholders and cross-sectoral cooperation. Focus is on monitoring and advocacy for change to ensure accountability for the effective implementation of European anti-trafficking policies and regulations.

All 30 members are NGOs, operating independently and from a grassroots level addressing human trafficking at European national level. General activities undertaken by platform members include direct and indirect social support and empowerment programmes for trafficked persons and risk groups including (psycho) social, medical, legal and vocational support, shelter services, long-term reintegration and employment support, provision of consultations and referral via national hotlines, prevention lectures and trainings to professional groups, awareness-raising, lobbying, advocacy and media campaigns.

**The Freedom Fund** is a leader in the global movement to end modern slavery. We identify and invest in the most effective frontline efforts to eradicate modern slavery in the countries and sectors where it is most prevalent. Partnering with visionary investors, governments, anti-slavery organisations and those at risk of exploitation, we tackle the systems that allow slavery to persist and thrive. Working together, we protect vulnerable populations, liberate and reintegrate those who have been trafficked, and prosecute those responsible.

## Acknowledgements

This report was researched and written by Suzanne Hoff and Eefje de Volder and commissioned and funded by the Freedom Fund. Ms Suzanne Hoff is International Coordinator of La Strada International. Dr Eefje de Volder is co-founder of Impact: Centre against Human Trafficking and Sexual Violence in Conflict, advisor on combatting human trafficking at the Dutch Coordination Centre against Trafficking (CoMensha), and board member of La Strada International.

We would like to thank all who assisted with the research and/or provided input into the analysis and drafting of the report. Special thanks go to all members of La Strada International, in particular Kateryna Cherepakha of La Strada Ukraine, Irena Dawid-Olczyk and Joanna Garnier of La Strada Poland, Corinna Panaite of Adpare Romania, and Tatiana Fomina and Elena Botezatu of La Strada Moldova. Special thanks also go to Evelyn Probst, Merel Brouwer, Anne-Marie de Brouwer, Martina Vandenberg, Liliana Sorrentino, Audrey Guichon, Katharine Bryant, Dan Vexler and Nicola Peckett. The report was edited by Alastair Whitson. Design by Lathwell Creative.

Finally, a special thanks to all the people who took the time to participate in the research and share their knowledge, and most especially to all the refugees, displaced people and those personally affected by the war in Ukraine who have shared their lived experiences and their views of what is needed to effectively respond to the heightened risks of trafficking and exploitation caused by the war in Ukraine.

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## Executive summary

The Russian invasion of Ukraine has led to the **largest movement of people in Europe since World War II**. Those who are fleeing the war in Ukraine are in an extremely vulnerable position. Experience from conflicts worldwide shows that the instability and turmoil created by war is fertile ground for traffickers seeking to exploit the vulnerability of internally displaced people and refugees.

In the weeks since the war started in Ukraine, there has already been **evidence of human trafficking activity**. Requests to support potentially trafficked people in countries bordering Ukraine, and in other European countries, have already been received by anti-trafficking organisations. National law enforcement bodies are reporting suspicious behaviour that could indicate human trafficking. Hotlines are receiving increased levels of calls for advice.

While it is too early to quantify the scale of the problem, **the risks are clear – and it is likely that these risks will increase** in the coming period, as the war continues, more people are internally displaced, access to services and livelihoods becomes more precarious, and millions of refugees face the need to settle for longer periods in other European countries and begin to access the labour market.

This report aims to provide a **rapid assessment** of the risks of trafficking and exploitation created by the war in Ukraine and the gaps in the current anti-trafficking response, in order to identify what needs to be done now to reduce and prevent trafficking before it is too late.

This rapid assessment is based on desktop research; interviews/discussions with **organisations, experts and participants in the anti-trafficking response** including volunteers, translators, refugees, and displaced people; and a field visit to Poland. (See Annex 1 for further details of the research methodology and participants.)

The research was conducted in March and April 2022. While this is a fast-moving and evolving

situation, it is hoped that this report, and its recommendations for governments, organisations and donors, can contribute to **the development of a comprehensive anti-trafficking response** to address the potential risks of trafficking faced by people fleeing from the war in Ukraine.

### Who is at risk?

The research identifies groups who are **particularly vulnerable to trafficking and exploitation**, and who should therefore be priorities for concern and action. These include:

- **People who are unable to access the EU's Temporary Protection scheme** – partly because they are reluctant to register due to a lack of information or incorrect information, or because they are not eligible for assistance under the scheme
- **Women and girls** – who are vulnerable not just to sexual exploitation but also to labour exploitation
- **Children** – particularly separated and unaccompanied children, and children in institutional care
- **People with non-Ukrainian nationality** – including undocumented and stateless people who were living in Ukraine prior to the Russian invasion
- **Groups who already experience marginalisation and discrimination** – including chronically ill, disabled, and elderly people; Roma; and LGBTQI+ people.

### What are the risks?

The research identifies a number of **factors which increase people's vulnerability to trafficking** – some of which apply to all crises, and some that are specific to the situation of war in Ukraine, including:

- **Inadequate or misleading information** – meaning that people don't get the support they need, or overlook or ignore potential risks of exploitation or abuse

- **Exposure to risks online** – traffickers and abusers are already using social media to target potential victims
- **Lack of money and/or access to livelihoods** – people who have fled without any money or resources are particularly at risk of labour exploitation
- **Criminal networks already operating in the region** – and acting with impunity due to the challenges of law enforcement in areas affected by conflict or experiencing a large influx of refugees
- **Pre-existing risk factors** – including the high prevalence in Ukraine of domestic violence (a known push factor for human trafficking) prior to the war, and vulnerabilities from secondary displacement or having lived in disputed territories in Ukraine from 2014 onwards.

### What are the gaps and needs in the anti-trafficking response?

The research identifies **priority areas for action** to tackle the actual and potential risks of trafficking and exploitation, including:

- **Lack of reliable information** – an uncoordinated proliferation of information provided by many different actors is creating confusion and misinformation for people who are already distressed and disoriented
- **Registration for temporary protection** – there continues to be unwillingness among some refugees to register in their country of arrival, meaning that they have no access to legal employment, housing, a basic income and other protection and support
- **Lack of psychosocial support** – many refugees have experienced severe trauma, and several organisations have mentioned psychosocial support as the most pressing need at this point
- **Lack of coordination** – the rapidly growing number of organisations now working in affected countries is leading to poor coordination and even duplication of anti-trafficking activity, and there is a lack of capacity and process for appropriate vetting of volunteers and others involved in the response
- **Lack of resources and funding** – civil society actors in Ukraine and neighbouring countries are already overburdened, understaffed and under-resourced
- **Inadequate government action** – governments in countries experiencing large numbers of refugee arrivals were ill-prepared for the crisis, with limited policies on, and resources for, anti-trafficking work.

### Recommendations

The report outlines recommendations for **governments, international organisations, anti-trafficking NGOs, and donors**, designed to address the gaps and needs in the anti-trafficking response in Ukraine and neighbouring countries (Poland, Romania, Moldova, Hungary and Slovakia). Key areas covered by the recommendations include:

#### 1 – To reduce vulnerabilities to human trafficking and exploitation/abuse

- **Access to information** – ensure accurate and accessible information (including, as a minimum, in the Ukrainian and Russian languages) is readily available to refugees about registration, helplines and support services
- **No one left behind** – ensure effective assistance and protection is provided to all refugees and internally displaced people without discrimination, with attention to particularly vulnerable groups including (but not limited to) women and girls, unaccompanied children, and groups that already experience marginalisation and discrimination
- **Comprehensive support** – provide specialist support across the full range of needs of displaced people and refugees, including (but not limited to) reproductive health care and psychosocial and trauma care.

## 2 – To ensure the identification of, and accountability for, exploitative and trafficking practices

- **Anti-trafficking structures** – make significant investment in national anti-trafficking structures and National Referral Mechanisms
- **Identification of trafficking activity** – establish early identification mechanisms at borders and reception centres; provide training and capacity-building for first line responders to identify possible trafficking cases and support potential victims; and resource and promote reporting hotlines and online reporting mechanisms
- **Monitoring of trafficking activity** – provide dedicated resources for monitoring of potential trafficking activity, particularly of recruitment/employment conditions to identify and reduce risks of labour exploitation
- **Prosecutions and accountability** – assist victims of trafficking-related crimes to access justice by providing legal advice and supporting prosecutions, including of conflict-related sexual violence and other war crimes.

## 3 – To ensure adequate referral and assistance to potential trafficked persons

- **Long-term, flexible support for frontline organisations** – provide long-term, flexible funding so that anti-trafficking organisations and networks can continue to meet the immediate and long-term needs of trafficked people.

# Introduction

The Russian invasion of Ukraine has led to the largest movement of refugees in Europe since World War II. Within the first two months of the conflict, more than 5 million people had fled the country to find refuge elsewhere<sup>1</sup> and more than 7.7 million people had been internally displaced within Ukraine,<sup>2</sup> with the numbers continuing to rise every day. Most of them are women and children, as men aged 18-60 have not been allowed by the Ukrainian government to leave the country.

According to UNHCR (the United Nations Refugee Agency), “Some 13 million people are estimated to be stranded in affected areas or unable to leave due to heightened security risks, destruction of bridges and roads, as well as lack of resources or information on where to find safety and accommodation.”<sup>3</sup>

Of those that could leave, Poland has received the majority, accepting more than 3 million people in just over a two-month period, followed by Romania, Russia, Hungary, the Republic of Moldova, Slovakia and Belarus.<sup>4</sup> An estimated 1.8 million have moved from these countries to other countries in Europe.

There is evidence suggesting that routes to Russia and Belarus have not always been voluntary. Many Ukrainians have been pushed to leave for Russia or Belarus through ‘humanitarian corridors’ which led directly to these countries. Despite denials from the Russian government,<sup>5</sup> there is evidence that the Russian occupiers have forcibly moved Ukrainian citizens from Russian-controlled territories to ‘depressed areas’ in Russia’s northern regions, particularly the Sakhalin peninsula.<sup>6</sup> The Russian Defence Ministry has reported that 951,000 Ukrainians – including 174,689 children – have been moved to Russia from occupied Ukrainian territories. Ukrainian officials have said that Russia has taken people’s passports and that these people are banned from leaving the area for two years.<sup>7</sup>

Those who flee the war in Ukraine are in an extremely vulnerable position. Conflict, instability and natural and man-made disasters have been shown worldwide to lead to an increase in human trafficking.<sup>8</sup> Profiteers – including organised

criminal groups and individuals – take advantage of the turmoil and lack of legal enforcement to exploit the vulnerability and desperation of internally displaced people and refugees.

## Note on terminology

This report uses the terms ‘internally displaced people’ and ‘refugees’ following the vocabulary used by UNHCR which refers to a broader definition of refugees as “people who have fled war, violence, conflict or persecution and have crossed an international border to find safety in another country.”<sup>9</sup> However, we acknowledge and respect the view of some organisations that it is better to refer to displaced populations rather than labelling people as ‘internally displaced’ or ‘refugees’.

## Definition of trafficking

‘Trafficking in persons’ shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

*[Source: United Nations (2000) Protocol to prevent, suppress and punish trafficking in persons, especially women and children<sup>10</sup>]*

In the weeks since the war started in Ukraine, there has already been evidence of human trafficking activity, with actors in the humanitarian response warning of a growing problem.

While there is insufficient information at this early stage to be able to draw firm conclusions about the scale of the problem, requests to support potentially trafficked people in countries bordering Ukraine, and in other European countries, have already been received by La Strada International member organisations and the International

Organisation for Migration (IOM).<sup>11</sup> Europol (the European Union's law enforcement agency) has received or identified signs of trafficking activity in relation to refugees from Ukraine.<sup>12</sup> Frontex (the European Border and Coast Guard Agency) has warned about "criminals operating in the area ... trying to find victims among the refugees which are mainly women and children" and reported an incident concerning two third-country nationals who tried to cross the border with two Ukrainian babies, having previously entered the country without children.<sup>13</sup>

National law enforcement bodies are also reporting "suspicious behaviour signals that could indicate human trafficking" – for example, an offer to a refugee to engage in sex work, and a number of registrations of individuals with a history of sexual abuse who are interested in hosting refugees from Ukraine.<sup>14</sup> The police services of Romania and Moldova reported serious suspicions that some of the refugees at the border were recruited by human traffickers.<sup>15</sup> Similar signs of trafficking activity were also recognised by the Dutch Liaison Officer based in Poland.<sup>16</sup> The Polish Ministry of Interior stated that the Polish public prosecutor's office was looking into a few potential cases of human trafficking and confirmed intelligence reports from the first days of the war "when strange persons were detected at the borders with possible bad intentions".<sup>17</sup> A representative of the Polish national police, however, could not confirm formal police investigations. She mentioned that over 1,000 phone calls and 200 email messages were received related to Ukrainian refugees, although these also included "fake statements and rumours".<sup>18</sup>

Existing hotlines on trafficking in Europe, operated by La Strada International members, IOM and others, are receiving up to five times as many calls as is normally the case. Calls are made in particular by refugees, but also by many worried citizens including those who host people and volunteers assisting refugees. The national hotline

for the prevention of domestic violence, human trafficking and gender discrimination operated by La Strada Ukraine has received numerous requests and questions from people on possibilities for evacuation and how to escape, how to stay safe, how to keep their children safe as well as questions about the situation in destination countries. The organisation also received calls related to sexual violence, harassment and rape. Many other women's and human rights organisations have shared testimonies, reports and anecdotal information about rapes, sexual violence and harassment, and other exploitative practices.

### **Trafficking risks in Ukraine since 2014**

Since 2014, armed conflict and Russian-backed occupation of the Donbas region and the Crimea have posed grave threats to civilian safety. According to UNHCR, approximately 1.4 million people had already been displaced due to the armed conflict and the occupation of the Donbas region and the Crimea since 2014.<sup>19</sup> This population has been especially vulnerable to trafficking and exploitation.<sup>20</sup> Employment options are limited and internally displaced people living in Russian-controlled territory face significant barriers to obtaining or renewing identification documents, increasing their vulnerability to exploitation.<sup>21</sup>

Human rights violations have also been reported across Ukraine in recent years, putting specific vulnerable groups, including LGBTQI+ people, rights activists and ethnic minorities like Roma at risk of further violations, exploitation and abuse.<sup>22</sup> Gender-based and domestic violence and discrimination against women have also been widespread.<sup>23</sup> Conflict, inequality, violations of human rights, gender-based and domestic violence, discrimination and the absence of viable employment opportunities or social support are major root causes for human trafficking and labour exploitation.



Between 2014 and 24 February 2022, Ukrainians (adults and children) have been exploited within Ukraine and across borders, including being trafficked for sexual exploitation and labour exploitation.<sup>24</sup> In the years prior to the war, trafficking for labour exploitation in particular has been on the increase. In 2020, over 90% of the identified Ukrainian victims were trafficked for labour exploitation<sup>25</sup> – more than half of them in Poland and Russia, two countries where many refugees are now residing.<sup>26</sup> They have been identified in a variety of sectors including construction, manufacturing and agriculture, as well as in the illegal production of counterfeit tobacco products.<sup>27</sup> Ukrainian children and vulnerable adults have also been trafficked for forced begging or for conducting criminal activities.<sup>28</sup> Since 2014, women and girls from conflict-affected areas have reportedly been trafficked for sexual exploitation in Ukraine, Russian-controlled territory, and Russia.<sup>29</sup>

in Ukraine and refugees from Ukraine, the gaps in the anti-trafficking response, and what is needed to address these gaps.

The research was conducted in March and April 2022. The situation in Ukraine and neighbouring countries is rapidly changing and evolving and this report therefore represents an analysis of trafficking risks based on available information at the time of the research. It is nevertheless hoped that this report, and its recommendations for governments, organisations and donors, can contribute to the development of a comprehensive anti-trafficking response to address the potential risks of trafficking faced by people fleeing from the war in Ukraine.

Stakeholders interviewed for this report acknowledged that more time would be needed to identify trafficking cases and exploitative practices following the Russian invasion. However, it is also generally expected that trafficking risks will increase in the coming period, as the war continues, more people are internally displaced, access to services and livelihoods becomes more precarious, and millions of refugees face the need to settle for longer periods in other European countries and begin to access the labour market.<sup>30</sup>

This rapid assessment is based on desktop research; interviews/discussions with organisations, experts and participants in the anti-trafficking response including volunteers, translators, refugees and displaced people; and a field visit to Poland. (See Annex 1 for further details of the research methodology and participants.) It considers the trafficking risks faced by internally displaced people

## Who is at risk?

The analysis below focuses on specific vulnerable groups identified by experts and affected persons in Ukraine and neighbouring countries.

### People excluded from the EU's temporary protection scheme

The European Union's Temporary Protection Directive provides people fleeing from Ukraine since the Russian invasion with rights including residency rights, access to the labour market and housing, medical and social welfare assistance, and access to education for children. It aims to provide immediate protections, while avoiding overwhelming EU member states' asylum systems. It applies to Ukrainian nationals, as well as their family members; non-Ukrainian nationals and stateless people who benefited from international protection (asylum) or equivalent protection in Ukraine, as well as their family members; and non-Ukrainian nationals and stateless people who were legally residing in Ukraine (with a valid permanent residence permit) who cannot safely return to their country of origin. People who fall outside these categories must be allowed access to the EU to transit prior to returning to their countries of origin.<sup>31</sup>

However, Ukrainian citizens who have fled without documentation, and non-Ukrainian nationals who cannot provide proof of legal residence in Ukraine, might be unable to access the temporary protection scheme. There is also evidence that people are reluctant to register to request temporary protection because of a lack of information about, or lack of understanding of, the scheme. For example, many interviewees – including volunteers at Warsaw Central station – told us that people fear registration because they believe that if they do register, they cannot return to Ukraine, cannot settle in another EU country, or might face forced returns if, after registering in one EU country, they then move to another EU country.

People who are unable or reluctant to register for temporary protection cannot legally work and are barred from access to official services and

support such as housing, health, education and other services, making them more vulnerable to trafficking and exploitation.

### Women and girls

It is estimated that more than 90% of the refugees who have fled from Ukraine since 24 February 2022 are women and children,<sup>32</sup> as Ukrainian men aged 18 to 60 are not allowed to leave the country. International organisations, media and civil society organisations have warned about the risk of trafficking for sexual exploitation.<sup>33</sup> However, the majority of interviewees for this research were particularly concerned about women's vulnerability to trafficking for labour exploitation, such as for domestic work or in other vulnerable sectors such as care-giving, agriculture, tourism and cleaning services.<sup>34</sup> Women and girls on the move or in temporary shelters are also at increased risk of gender-based violence.

### Children

According to the UN, children make up half of all refugees fleeing the conflict. By the end of April 2022, over two million children had crossed the borders, with more than 1.1 million arriving in Poland and hundreds of thousands in other neighbouring countries.<sup>35</sup> In addition, UNICEF estimates that up to 2.8 million children have been internally displaced within Ukraine.<sup>36</sup>

### *Separated and unaccompanied minors*

UNICEF has warned that children fleeing the war in Ukraine are at heightened risk of trafficking and exploitation<sup>37</sup> – and this applies particularly to children travelling alone. The exact number of separated and unaccompanied children is unknown as data has not been consistently collected, especially during the chaotic first days of the war. In Poland, border police report that large numbers of children were travelling with neighbours and other acquaintances, but due to the large influx of refugees they were unable to verify whether all these children were travelling with people who

had legal custody.<sup>38</sup> In Romania, more than 500 unaccompanied children were identified crossing the border over a period of three weeks.<sup>39</sup>

Save the Children and Missing Children Europe have called for adequate registration of unaccompanied minors and highlighted the importance of the Schengen Information System to record information about children and their whereabouts.<sup>40</sup> Europol is also considering setting up a main database with information on minors leaving Ukraine and their whereabouts.<sup>41</sup>

To support children and families travelling from Ukraine to safety in Moldova, Poland, Romania and other countries, UNICEF has created Blue Dots – safe spaces that provide key information for families and facilitate identification and protection of unaccompanied or separated children travelling without their families. Information is also provided in child-friendly formats.

In addition, some protection for separated and unaccompanied minors is now provided through a system of temporary guardianship in the country where the children arrive, which Poland among other countries has set up under new legislation.

### ***Children in institutional care***

Prior to the war, around 100,000 children lived in institutional care and boarding schools in Ukraine, half of them children with disabilities.<sup>42</sup> Some institutions have sent children back to their parents or relatives so that they can take the children with them when fleeing. In addition, the Ukrainian government has, together with other countries, organised evacuations for children in institutions to neighbouring countries.<sup>43</sup> According to UNICEF, the government of Ukraine has now issued clear directives to all child-care facilities on how to organise evacuations in a safe and orderly manner.<sup>44</sup>

### ***Adoption***

With so many children displaced and on the move, there are increased risks not just of trafficking for child labour or sexual exploitation, but also of abduction and trafficking for illegal adoption.<sup>45</sup>

UNICEF warns that adoption should not occur during or immediately after emergencies.<sup>46</sup> Efforts should first focus on reunification of children with their families, in the best interest of the child, as also confirmed by Missing Children Europe and other child rights organisations. However, there have been reports of requests for adoption of Ukrainian children by foreigners, and it has been reported that Russia is changing its legislation to make it easier to adopt children from Ukraine into Russia.<sup>47</sup>

### **Chronically ill, disabled and elderly people**

Organisations supporting disabled people in Ukraine and at EU level have raised concerns that disabled people, especially in Russian-occupied territories, are not well-protected and that there is a “lack of coordination of support for these people as well as a lack of recognition for their disability status”.<sup>48</sup> Chronically ill, disabled and elderly people are often very dependent on others and, at times of war, risk being left behind when others flee, or unable to access the support and care they require to meet their basic needs. Their vulnerability can expose them to an increased risk of exploitation and abuse.

### **People with non-Ukrainian nationality**

When the war started, Ukraine hosted significant numbers of people who were not Ukrainian citizens but were lawfully in Ukraine for work or study.<sup>49</sup> This includes students from, among others, the Democratic Republic of Congo, India,<sup>50</sup> Morocco,<sup>51</sup> Pakistan, the Philippines, Tunisia, Azerbaijan,<sup>52</sup> Tajikistan and Kyrgyzstan.<sup>53,54</sup>

While estimates vary, the number of people involved is in the hundreds of thousands. According to the IOM, as of 5 May 2022 more than 241,000 people who do not have Ukrainian nationality were estimated to have fled Ukraine.<sup>55</sup>

These groups experience discrimination both at the borders and in accessing assistance in neighbouring countries. The European Network Against Racism (ENAR) and others reported double standards and

racial profiling in the reception of refugees from Ukraine.<sup>56</sup>

While non-Ukrainian nationals who have been legally residing in Ukraine also fall under the new EU Temporary Protection Directive, several interviewees indicated that those without Ukrainian nationality seem less entitled to temporary protection in practice.<sup>57</sup> As a result, it has been reported that non-Ukrainian nationals face challenges in receiving access to residency rights, accommodation and regular employment.<sup>58</sup> IOM Moldova reported that non-Ukrainian nationals who have fled from Ukraine risk becoming irregular in Moldova, as people can only remain in the country up to a maximum of three months without legal residence.<sup>59</sup> IOM, Frontex and embassies have assisted non-Ukrainian nationals to return to their country of origin.

This precarity places these non-Ukrainian refugees at greater risk of exploitation. When access to mainstream support, protection and/or rights is denied or frustrated, people will look for alternative options to find safety.<sup>60</sup>

In relation to migration from Russia, Frontex noted that nearly 40,000 people left Russia via the Eastern border route between 8 and 21 March 2022<sup>61</sup> and warned of an increase in irregular migration from Russia, but also from Belarus.<sup>62</sup>

### Undocumented people

Before the war some 37,700 to 60,900 undocumented people were living in Ukraine.<sup>63</sup> As a result of the war, they have experienced difficulties in accessing rights and protection, including temporary residence permits, in countries where they have sought refuge. PICUM, a European network of organisations that support undocumented migrants, expressed concerns that this places undocumented people in a precarious situation.<sup>64</sup>

### Stateless people

Stateless people fleeing the war in Ukraine (including former citizens of the USSR who have

not acquired Ukrainian nationality) are reported to have faced additional barriers and differential treatment depending on their residence, nationality and/or documentation status.<sup>65</sup> Those without proof of legal residence in Ukraine may need to apply for international protection.

### Roma

The 2021 EU Strategy on Combatting Trafficking in Human Beings specifically mentions the vulnerability of Roma to human trafficking practices. Up to 400,000 Roma are estimated to have lived in Ukraine, with the largest communities in the regions of Crimea, Odesa, Donetsk and Dnepropetrovsk.<sup>66</sup>

Several actors have raised awareness about the maltreatment of and discrimination against Roma at the border and during their flight.<sup>67</sup> The EU Fundamental Rights Agency (FRA) stated that “some Roma were left waiting for transportation at border crossing points. Some people refuse to sleep in the same tents with Roma families or travel in the same vehicles with them.”<sup>68</sup> A representative of the European Roma Grassroots Organisations network (ERGO) reported that Hungarian Roma are starving, their capacities are drained and they can barely support other Roma who are arriving in Hungary; that Roma arriving in Poland have faced discrimination from volunteers assisting refugees; and that those who fled to Moldova – estimated to be around 600 people – have faced difficulties applying for protection.<sup>69</sup> Roma who have not been formally registered in Ukraine, and thus do not hold documents, might not be able to obtain temporary protection status.<sup>70</sup> At the same time, after the war ends, they might experience problems in returning, as they cannot prove their Ukrainian citizenship.<sup>71</sup>

### LGBTQI+ persons

The Russian invasion raised immediate concerns about LGBTQI+ people in Ukraine. While their legal status has improved in Ukraine, the application of Russian anti-LGBTQI+ legislation has been extended since 2014 to the territories under the



effective control of Russia – Crimea, Donetsk and Luhansk, which have adopted “virtually identical legislation”<sup>72</sup> – making LGBTQI+ people targets for discrimination and prosecution. The LGBTQI+ community has also experienced difficulties in accessing assistance, both at the border and beyond. Transgender Europe (TGEU) reported cases where trans women could not cross the border from Ukraine if they were registered as male in their passport, as the Ukrainian border police assesses their gender based on their passports.<sup>73</sup> TGEU also reported that transgender people often could not continue with hormone treatment and that basic medical supplies are often missing in LGBTQI+ shelters.<sup>74</sup>

### Sex workers

While the sex workers’ rights organisation Sex Work Polska has been contacted by sex workers who have arrived in Poland from Ukraine, it has not yet documented an increase in the number of sex workers from Ukraine in Poland.<sup>75</sup> However, offering sex services is a well-known survival strategy for women in conflict situations.<sup>76</sup> In Romania, AIDRom has received the first indications that Ukrainian women are offering sexual services at high end hotels in the capital, although it is not alleged that these women are trafficked and have been forced to engage in sex work.

### Victims of war-time rape

In the past weeks, testimonies and anecdotal reports have been shared, including by La Strada Ukraine, Human Rights Watch,<sup>77</sup> WAVE (Women Against Violence Europe), Homo Faber in Poland and AIDRom in Romania, about Ukrainian women who have experienced rape by Russian soldiers. Although the full scale of conflict-related sexual violence is not yet known, it seems that hundreds of cases have been committed, not just against women and girls, but also men and boys and people of other gender identities, and of all ages.<sup>78</sup> Depending on the circumstances, some of these rapes may also qualify as human trafficking, as determined by the

International Criminal Tribunal for the Former Yugoslavia.

Apart from the psychological and physical damage, rapes and other sexual violence may also result in unwanted pregnancies. When women and girls flee to Poland, they are confronted with anti-abortion laws which prevent them from terminating a pregnancy which resulted from rape.<sup>79</sup> This creates additional stress and anxiety and might be a reason for women to remain in Ukraine where abortion is legal, or travel to other EU countries, or seek dangerous or illegal alternatives. While abortion pills have been secretly handed out in Poland in recent years, an activist is currently standing trial for “helping with an abortion” and facing up to three years’ imprisonment.<sup>80</sup> This creates a dilemma for Polish NGOs that are currently supporting these women as they risk criminal charges.<sup>81</sup>

## What are the risks?

Pathways into trafficking and exploitation for refugees typically include: being approached by strangers (at the border, in shelters, at other venues or online) with false promises of accommodation and work in the country of arrival or another European country;<sup>82</sup> targeting of women for forced marriage or sex work (based on stigma and perceptions about Ukrainian/Eastern European women); or requesting sexual or other services in return for rent or accommodation. There are also risks of abduction/forced adoption of children.

While these trafficking risks are generic to any crisis,<sup>83</sup> some are more specific to the current Ukrainian refugee situation. The following have been identified as factors which increase people's vulnerability to trafficking in the context of the war in Ukraine.

### Erosion of the rule of law

Prolonged conflict typically results in an erosion of the rule of law, institutional breakdown and corruption. This creates a situation where criminality – including human trafficking – can flourish with impunity. Due to the nature of these crimes and the complexity of an emergency context, many cases can remain hidden. Reported human rights violations in the occupied parts of Ukraine and recent erosion of the rule of law in Poland and Hungary, to which many refugees have now fled, may impact accountability for particular crimes. Corruption is also a key factor in increasing the risk of exploitation.<sup>84</sup>

### Criminal networks involved in trafficking

Given the possibility (under the Temporary Protection Directive) for the majority of refugees from Ukraine to enter the EU freely, Europol has stated it does not expect a significant increase in people smuggling activities.<sup>85</sup> However, Frontex has raised concerns about criminal networks operating in the area – particularly those which have historically been involved in smuggling of cigarettes and alcohol across the border between Ukraine and EU countries – and has warned of an increase in

irregular migration from Russia and from Belarus.<sup>86</sup> There are clear links between people smuggling and human trafficking and generally the region around Ukraine is known for corruption and trafficking crimes. Criminal networks consisting of both EU and non-EU nationals are known to engage in trafficking of human beings, including children, in the EU.<sup>87</sup>

### Absence of sustainable social ties

In the absence of social ties, people become more vulnerable to trafficking. Children and adults who have fled alone face a significantly increased risk of trafficking. These refugees must rely on others for safety and can be targeted because of this vulnerability. Those who have relatives or contacts in neighbouring countries are less susceptible. Those with a clear destination in mind can reach out to their contacts in case of need.

### Lack of money and/or access to livelihoods and economic opportunities

Lack of financial means is a major risk factor for trafficking as it creates desperation. Individuals in need of money are compelled to accept job offers quickly with poorer working conditions than they would normally do. It can also create situations of people falling into debt bondage.

Prior to the conflict, Ukraine already had one of the lowest minimum wages in Europe.<sup>88</sup> According to the IOM, within the first month of the war, the income of displaced households dropped sharply.<sup>89</sup> Some people lost their jobs or no longer received their salaries. Pensions are, in principle, still paid, but are generally very low, and inadequate to meet even basic needs, especially when people have fled to countries with much higher costs of living.

Although the Ukrainian government, through the Ukraine Central Bank, has managed so far to keep the banking system running,<sup>90</sup> those with bank accounts in Ukraine have reported difficulties accessing their funds. Several Russian banks were operational in Ukraine, and Ukrainians with

accounts at these banks may have seen their accounts frozen due to EU sanctions.

Before the war, many workers in Ukraine received their wages in cash.<sup>91</sup> Yet the Ukrainian hryvnia cash that refugees carried with them when they fled cannot be exchanged in European countries, leaving refugees potentially impoverished. In April 2022, the European Council agreed a recommendation to allow for the exchange of Ukrainian hryvnia banknotes into local currencies to support people escaping the war in Ukraine.<sup>92</sup>

Refugees who have not registered in another European country under the EU Temporary Protection Directive have no access to financial support from the governments of these countries. To mitigate the risks of people being left without money, UN bodies and charities have started cash delivery programmes in Ukraine and neighbouring countries.<sup>93</sup>

Even before the war broke out in Ukraine, the unemployment rate was higher than average for Europe (around 9%)<sup>94</sup> with many people lacking access to decent work or relying on low-paid and unregulated sectors like domestic work. While the EU Temporary Protection Directive provides the right to work, and the EU aims to provide support to Ukrainian refugees seeking employment, in practice many Ukrainians may still have limited access to decent work, exposing them to an increased risk of labour exploitation.

### Psychological condition of those fleeing conflict

Many refugees and internally displaced people are disoriented, traumatised, isolated and in urgent need of psychological support.<sup>95</sup> The dangerous situations in which some of them live creates additional stress. Organisations working at the borders have indicated that the longer the war continues, the more traumatised the people crossing the border are. These circumstances can lead to negative coping mechanisms, making people easier targets for trafficking and exploitation.

Several organisations have mentioned psychosocial support as the most pressing need at this point.<sup>96</sup> However, lack of capacity (in terms of therapists and interpreters) is hampering the fast mobilisation and delivery of psychosocial assistance in Ukraine and in neighbouring countries.

### Lack of access to reproductive health care

The war has put the health care system in Ukraine under strain. The WHO Regional Office for Europe has reported that “many health workers are displaced themselves or unable to work” while around 1,000 health facilities “are close to conflict lines or are in changed areas of control”. As a result, people’s access to health care (including medicines) is severely limited.<sup>97</sup>

In particular, refugee women and girls’ lack of access to sexual and reproductive health care exposes them to increased risks of harm from sexual exploitation and abuse. In Poland, victims of wartime rape who have become pregnant cannot choose abortion as this is prohibited by law.

### History of domestic violence

Domestic violence is known to be a push factor for human trafficking and it is noted that victims of trafficking may previously have been victims of domestic violence.<sup>98</sup> Prior to the conflict, gender-based and domestic violence was widespread in Ukraine<sup>99</sup> and this suggests that many women and girls among the refugees coming from Ukraine may be at increased risk of trafficking and exploitation.

### Living in occupied areas

Ukrainian support organisations have indicated that people who lived in occupied territories prior to the February 2022 invasion are more vulnerable because they have lived in a state of emergency for years. In occupied areas, there is significant association with socio-economic disadvantage, food deprivation and poor mental health, which can increase vulnerabilities.

### Secondary displacement

In Poland, first line responders (including the border police) and other organisations (including SIP – the Association for Legal Intervention) have noted that people who have experienced more than one displacement – for example, from their home to a supposedly safe area, and then to other areas within Ukraine or to neighbouring countries – are often in a worse state than those who have only fled once, making them easier targets for traffickers.

### Staying in a camp or temporary shelter

While camps or temporary shelters for internally displaced people and refugees should be a place of safety, experience from previous humanitarian crises shows that they can in practice be contact points for traffickers and their potential victims. Particularly at the beginning of the war, there were reports of people being able to enter refugee facilities without being monitored, and of people trying to get in contact with those residing in shelters and offering employment or relocation. Vulnerable people in these circumstances can be easy targets for traffickers.

### Not speaking the language and not knowing your way

One of the most obvious reasons why people might be more easily targeted by those who seek to profit from them, is because they are in an unfamiliar place and are unable to speak the language. A large proportion of the current refugees have never been in another European country before.

### Inadequate or misleading information

Information spreads fast, whether it is accurate and well-intentioned, or inaccurate and misleading. Generally, refugees are not deliberately provided with inaccurate information. However, many questions are asked by refugees, and not all first line responders will have all the correct information to hand, or the time and space to respond. A lack of information, contradictory or confusing information, or an overload of too much information

can also feed a lack of trust – with a particularly negative outcome being that warnings about the potential risks of abuse, including trafficking, can result in refugees being more hesitant to accept advice or assistance.

Interviews with stakeholders in Poland<sup>100</sup> (and confirmed by stakeholders in other countries) indicate that some refugees are reluctant to register themselves<sup>101</sup> due to a lack of information or understanding about the provisions of the EU Temporary Protection Directive. However, it has been reported that Ukrainians are now quite willing to register in Poland, as registration is a condition for receiving access to benefits under the new special law on assistance to Ukrainian nationals in Poland, which was adopted on 12 March 2022.<sup>102</sup> According to a Polish lawyer, the available Polish data shows that there are currently queues at registration points and that by 5 April 2022, about 700,000 Ukrainians had registered themselves in Poland.<sup>103</sup>

In Romania, registration was also more problematic at the beginning of the refugee arrivals, but because of information campaigns, the number of refugees making use of temporary protection has since increased (while applications for international protection, which people were making because they were unaware of their right to temporary protection, are decreasing). In Moldova, a non-EU country, it has been noted that many want to travel on to Romania and then further to other EU countries, due to better economic prospects.

### Exposure to risks online

Several civil society actors, including La Strada International members, have noted that potential traffickers and abusers are using social media to recruit Ukrainian women for the sex industry or search for potential marriage candidates.<sup>104</sup> The Organisation for Security and Cooperation in Europe (OSCE) has highlighted that the risks of exploitation extend to the virtual space, “as many Ukrainians are using social media to look for help and support, thus revealing important information



about their location and difficult situation that can be used by traffickers to identify and contact them under a pretext of assistance.” The OSCE has stated that recruitment and advertisement of victims for sexual exploitation has shifted online since the start of the war, and has reported a “spiking online demand for sexual access to Ukrainian women”.<sup>105</sup>

Interviewees have also indicated the particular risks for labour exploitation, due to the high demand – including online – for workers for various sectors. Civil society, governmental actors and media sources also report<sup>106</sup> that “thousands of jobs are being offered exclusively to Ukrainian refugees by on-the-ground recruitment agencies and through a vast network of online job boards that has sprung up across social media”<sup>107</sup> – with no safeguards against these jobs being exploitative.

## What are the gaps and needs?

Emergencies of this sort generally exceed the capacity of states to protect affected people, which increases people's exposure to trafficking-related risks. In the context of the unfolding humanitarian crisis caused by the war in Ukraine, interviewees noted that no neighbouring country could have been prepared for what was coming.<sup>108</sup> However, national and international governmental actors, civil society organisations and donors reacted quickly to respond to the humanitarian needs and also to establish an anti-trafficking response. (More information about participants in the anti-trafficking response is given in Annex 2.)

Neighbouring countries and other EU refugee-receiving countries have welcomed refugees and allowed them access to their countries. Governments, with the support of international governmental actors, humanitarian partners, local civil society organisations and thousands of individuals and volunteers, started to quickly provide assistance and reception capacity.

Refugees have been provided with humanitarian support, food, accommodation, transportation and access to other basic services and support. Protection mechanisms to strengthen the identification and provision of support to the most vulnerable refugees were set up and communication campaigns were strengthened to ensure refugees have access to critical information. Refugees were also provided with mental health and psychosocial support and cash assistance. The relocation of refugees to other countries, to reduce pressure on several neighbouring countries, in particular Poland, Romania and Moldova, also took place from the start. Respondents in these countries confirm that many refugees have already left for other European countries.

In contrast to other refugee flows, there was generally quite a lot of solidarity among the European population to welcome refugees, hence the willingness of many European citizens to donate money and to host refugees in their private houses or offer other assistance, including the offer of transport to other countries. While mostly well-

intentioned, lack of oversight of such assistance – and lack of vetting and registration procedures for volunteers and insufficient checks on offers of housing – may have exposed refugees to trafficking risks. There is some evidence already for this.<sup>109</sup>

Generally, the capacity of the main (particularly local) actors to deliver anti-trafficking interventions is under pressure. In the beginning, neighbouring countries to Ukraine were overwhelmed by the refugees coming in. Therefore, initially the response to the large refugee flows was inevitably more chaotic than it currently is. Several actors acknowledged that much more coordination and control is now in place. Civil society actors in Romania expressed in particular their appreciation for the strong coordination role the government has taken in the anti-trafficking response and the support provided to refugees. However, several actors highlighted the need for more coordination.

It should be noted that in some countries, the new refugee flows have changed the character, scale and scope of their experience of, and response to, trafficking risks. For example, Moldova has previously predominantly been a country of origin for human trafficking, meaning that mainly Moldovan victims who were trafficked abroad have then been assisted by organisations in Moldova upon their return. The flow of refugees into what were predominantly 'countries of origin' like Moldova requires a different response and change of mindset among relevant actors. So far there have been few cases of exploitation of foreigners reported in the country.<sup>110</sup>

At the same time, the anti-trafficking response in some countries was not optimal due to a lack of capacity and resources preceding the war. In Poland, there is no formal National Referral Mechanism in place, and the main inter-ministerial body responsible for coordinating the national anti-trafficking response was liquidated in 2019; now the Ministry of Interior is the main actor responsible for the anti-trafficking response. In Moldova, a similar lack of anti-trafficking capacity at the level of the government was noted. The

Moldovan and Romanian governments – and those of other European countries to a lesser extent – have generally limited financial resources available for anti-trafficking activity and might welcome financial resources. In this sense, the current refugee flows have served to highlight what is still needed to prevent and address human trafficking in the countries most affected by the crisis.

### Gaps and needs identified by this research

- Refugees still lack adequate **information**. There is a lot of different information provided by many different actors, which also leads to information overload, misinformation and/or contradictory information. It is important that fragmentation of information is avoided; information should be coordinated at central level, as much as possible, to enable accuracy and consistency, with more cooperation on the prevention materials currently disseminated by various actors. A representative of the Ukrainian government, for example, raised concern about “receiving over 30 different prevention materials developed to inform people about trafficking-related risks”.<sup>111</sup>
- While there have been improvements in **registration for temporary protection** under the EU Temporary Protection Directive, there continues to be unwillingness by some refugees to register in their country of arrival. This can be due to misinformation – for example, the incorrect belief that you will be unable to return to Ukraine after being registered. However, it is also caused by a lack of certainty about the provisions in the directive relating to moving from the country where you first register (which means you will lose your rights to temporary protection in that country) to another EU country (where you will have to re-apply for temporary protection rights). It remains partly unclear what barriers refugees will face when accessing the scheme and when moving to different EU countries.  
  
Those that do not register – or who delay registering until they have travelled on to
- another country – have no access to legal employment, housing, a basic income and other protection and support. It is therefore important that EU member states provide clear information about the national regulations now in place, as well as any exceptions related to assistance and support. It is further important that residence and other rights under the directive are fully transferable to other EU member countries as intended.
- There remain groups that are **excluded from the rights and protections** provided under the EU Temporary Protection Directive and are consequently more vulnerable to exploitation and abuse. All refugees should be welcomed and have access to protection and support.
- Vulnerable **women** and children on the move do not have access in all neighbouring countries to safe spaces where they can receive information and support (such as UNICEF’s Blue Dots initiative).<sup>112</sup> There are also challenges to ensure sufficient protection for **children**, especially unaccompanied and separated children. To reduce the risks of human trafficking, there is a clear need for effective temporary guardianship mechanisms to be in place and for alternative housing for children, outside institutional care. Currently there seems to be a lack of foster families and many children might be placed again in institutional care, which will create vulnerabilities.
- The lack of **financial means** is putting refugees from Ukraine at risk of trafficking – especially those that (due to non-registration) have no access to financial support or income. It is important that refugees receive swift access to financial support including cash payments to pay for immediate needs.
- There is lack of capacity that prevents the fast mobilisation of **psychosocial assistance and trauma care** in a language that people can understand. Also, those providing first line assistance should themselves receive support

and have access to counselling to prevent burn out – especially since many volunteers and translators are also Ukrainians who themselves also have to cope with the war situation.

- Civil society actors in Ukraine and the neighbouring countries are already overburdened, understaffed and **under-resourced**. NGOs are not structurally funded by governments and are often overly dependent on foreign donors; more structural support from national governments and foreign donors is needed, in particular to ensure that services can continue.
- Several new **helplines and hotlines** have been set up and these new and existing helplines are promoted in various information materials, sometimes without consulting the organisations running these lines. As a result, these helplines receive many requests that do not fit their mandate or which are beyond their capacity to respond to. For those needing help, it might also be difficult to judge which number it is best to call. Refugees should receive clearer guidance about the support available: respondents to this research saw no need for even more helplines, rather the opposite. There also needs to be more referral and cooperation among helplines within and across countries.
- There are challenges raised by the rapidly **growing number of NGOs and international actors** in affected countries, leading to risks of lack of coordination and duplication. Donors should endeavour to identify organisations that are experienced, trusted by communities, and with a close understanding of needs. They should ask questions about how organisations are linked into referral structures and avoid duplication where possible. While there is a need for emergency funding, it is important that organisations are funded for their core work to enable them to provide emergency services too. Funding is also needed to ensure long-term shelter and reintegration support for refugees.
- There are also challenges with the lack of **vetting/registration of volunteers**, which is currently mainly done through the goodwill of organisations themselves but not required by the governments of most countries. While the solidarity movement is incredible, within the large numbers of well-intentioned volunteers and humanitarian staff there can be individuals who are seeking to profit from or take advantage of the vulnerability of refugees. Staff of humanitarian organisations and volunteers acting on the ground should be registered and vetted, including through background checks, to address the significant safeguarding risks that exist in any fast-moving humanitarian crisis involving a highly vulnerable population. It is also important that there are clear procedures in place to act swiftly in cases where volunteers or humanitarian staff might be involved in abuse or exploitation.
- The EU Anti-trafficking Directive, Article 11(4), obliges EU member states to take the measures necessary to establish appropriate **mechanisms for early identification, assistance and support for victims**, in cooperation with relevant support organisations. Currently more than half of the EU member states have National Referral Mechanisms in place for all types of victims, but several EU member states (including Poland) do not. Ukraine also currently has no national action plan or strategy on trafficking. To enhance early identification, the most deployed measures are self-reporting, awareness-raising campaigns, using indicators and checklists, intelligence gathering, and applying proactive screening mechanisms in asylum and migration processes.
- In several European countries there are issues with **resources for anti-trafficking action by governments** including for the implementation of the National Referral Mechanism (NRM) or other national policies, strategies and action plans. The low level of financial resources leads to limited engagement and commitment of anti-trafficking institutions and organisations.



Governments need to step up their commitment to their NRM and the establishment of policies and actions plans, and ensure adequate resources for their implementation.

- There is a severe risk of **impunity and lack of accountability** for atrocities committed against people in Ukraine (for example, conflict-related sexual violence), but also to people from Ukraine fleeing abroad (for example, cases of discrimination). There needs to be better cooperation among state institutions, civil society actors and international institutions working on accountability for violations of international humanitarian law and human rights in the context of the ongoing war in Ukraine.<sup>113</sup>

# Recommendations

Most of the recommendations are designed to address the gaps and needs in the anti-trafficking response in Ukraine and neighbouring countries (Poland, Romania, Moldova, Hungary and Slovakia). These are the countries most affected by the war, and since the neighbouring countries are the first to receive the displaced population crossing the border from Ukraine, this is where measures should be prioritised to tackle the problem at its core.

## 1 – To reduce vulnerabilities to human trafficking and exploitation/abuse

### *Governments and international organisations*

- Invest in the promotion of **registration of refugees** to ensure swift access to protection measures and address barriers to registration for refugees without legal documentation. This includes, at a minimum, addressing misinformation on legal residence and access to rights in EU countries and providing adequate information (in Ukrainian, Russian and English) about the national implementation of the EU Temporary Protection Directive and the right to apply for international protection (asylum). Unaccompanied children arriving at the border (or any other point of entry) must be properly registered.
- Promote **adequate information provision** to displaced and refugee populations about risks of exploitation and abuse. At a minimum, information needs to be provided in Ukrainian and Russian, alongside translation into other languages as required. This information must be shared as broadly as possible, both online and offline, taking into account the means to access information for different age groups, abilities, and levels of digital literacy.
- Provide immediate access to (reproductive) **health care** and **psychosocial and trauma care** in Ukraine and in neighbouring countries for displaced people and refugees.
- Ensure effective assistance and protection is provided to all refugees and internally displaced people **without discrimination** to reduce the likelihood that people have to rely on ill-intentioned individuals.
- Invest in **specific vulnerable groups** and recognise their specific vulnerability to trafficking, including Roma, and those who have no access to formal support. Take specific steps to address barriers to accessing assistance and protection including safe passage across borders.
- Ensure the swift implementation of the EU recommendation to set up national schemes that would allow for the **conversion of hryvnias** to an EU currency under similar conditions across the EU.
- Introduce systems to **register and vet** staff, volunteers, private individuals and legal entities who offer humanitarian assistance, private housing, private transport and other services to displaced people and refugees, in order to ensure oversight of individual volunteers and volunteer organisations/groups contributing to the refugee response. Those who are vetted and registered should be provided with **identification** so that children and families are able to identify who to trust.
- Make sure that (temporary) **state refugee facilities/shelters** are safe and well protected by ensuring that unauthorised persons cannot access them.
- Ensure **mandatory checks of accommodation** (suitable and safe, risk assessment) and introduce processes to check in regularly with refugees after they have been accommodated.
- Arrange **safe transport** options and legal routes for persons within Ukraine and from Ukraine to neighbouring countries as well as **safe relocation** to other EU countries. Children and their families should be kept together at all times in the provision of transport and accommodation.

- Ensure effective international cooperation to **identify and trace missing children** as they might be at risk of trafficking.
- Introduce a **mandatory check** for unaccompanied minors on whether **family reunification** is still possible and in the best interest of the child.
- Promote the **prevention of child adoptions** during times of emergency (in close cooperation with relevant civil society organisations) and ensure a **moratorium on inter-country adoption** during and immediately after the conflict, including for adoption procedures that were already underway before the conflict.
- Support the promotion of **family-based care** for all children in or relocated from institutional care in Ukraine, including through the expansion and professionalisation of foster care provision (for example, through registration of Ukrainian foster carers who have moved across borders, identification and vetting of new foster carers, specialised training for new and existing foster carers, and ongoing mentoring and support).
- Set up an official website that promotes **verified job opportunities** for refugees (with support of trade unions and civil society organisations) in order to reduce refugees' risks of labour exploitation.
- Devote specific resources within government agencies tasked with labour regulation in European countries for **monitoring recruitment** of Ukrainian workers (and other nationalities displaced from Ukraine by the war) and their employment conditions.
- Include **trade unions and migrant rights groups** in the National Referral Mechanisms for trafficked persons.
- Arrange **safe return/transport** for Ukrainians who wish to go home when the situation in Ukraine stabilises.
- Ensure **access to international protection** for refugees who fall outside the temporary protection system.
- Enable **accountability for all types of criminality** (including discriminatory, abusive and exploitative practices) by promoting monitoring of rights violations, and assisting with independent investigations into atrocities/ complaints and with filing a case and/or lodging a complaint.
- Monitor, investigate and **prosecute cases of war crimes**, including cases of conflict-related sexual violence (which falls within the definition of human trafficking) and other forms of grave violations, in Ukraine and in other countries to which victims of war crimes have fled.

#### **Anti-trafficking NGOs**

- **Inform refugees (online and offline)** about the importance of registration and their rights to financial support, legal residence, safe transport, safe housing, and decent employment options (including addressing misinformation about the EU Temporary Protection Directive and/or rights to international protection).
- Scale up available **psychosocial and trauma care**.
- Use offline and online awareness-raising campaigns to **reach out to vulnerable groups** and inform them about their rights and the risks of different forms of human trafficking.
- Establish and strengthen cooperation with **trade unions and migrant rights groups** to support them to raise awareness about trafficking risks.

#### **Donors**

- Provide **financial support** to meet the most pressing needs for refugees and internally displaced people, in particular reproductive health care, psychosocial and trauma care, transport, and housing facilities. This includes providing emergency funding with quick release of funds.

- Invest in **promoting access to information** as the provision of accurate, consistent and comprehensive information is key for displaced people and refugees to be able to take well-informed decisions in situations of uncertainty.
- Funding must be made available for integrated **child protection** and **gender-based violence** risk mitigation, prevention and response programmes in Ukraine and neighbouring countries. This should include, as a time-sensitive and life-saving intervention, the clinical management of rape.
- Invest in the expansion and professionalisation of **family care/foster care** to reduce the risk of child trafficking.
- Support governments, international organisations and civil society organisations with human resources (lawyers) or financial resources to realise **access to justice** for victims of crimes committed in the wake of the Ukrainian war.
- Assist in the promotion of **decent employment** for displaced people and refugees, and support initiatives between civil society organisations and private sector actors.

## 2 – To ensure the identification of, and accountability for, exploitative and trafficking practices

### *Governments and international organisations*

- Ensure the establishment of **early identification mechanisms** at borders, reception centres and at workplaces and embed these mechanisms in National Referral Mechanisms.
- Identify and register **unaccompanied and separated children** as early as possible during population movements, track children during relocation and maintain registration during transit points whenever possible. Support unaccompanied and separated children to access guardianship procedures and child protection services. Best interest assessments should be established as standard for all unaccompanied and separated children displaced across borders.
- Train – and build the capacity of – **border police, volunteers, and other first line responders** at borders and in reception centres on how to identify trafficked persons.
- Establish **reporting mechanisms** (for example, through online platforms) to allow people to report concerns about trafficking and/or online content that might be related to forms of exploitation/human trafficking, as well as actual abuse and violations.
- Provide specific **support for migrant workers** including counselling centres, mobile drop-in centres, and online and offline outreach work to support potential victims of trafficking.
- Disseminate information about existing **hotline and support structures**.
- Provide training and raise awareness of **labour inspectorate, police, lawyers, judges** on early identification of trafficking – including on the interrelationship between national/ EU law and relevant aspects of international humanitarian law, international criminal law and



the monitoring, reporting and accountability mechanisms that uphold them – and ensure such training aligns with existing training structures.

- Ensure specific training on interviewing children and responding sensitively to **child victims of trafficking**.
- Set up initiatives that focus on **promoting decent employment** and addressing bogus employment (for example, training on ethical employment, information provision on labour rights and employment procedures, setting up employment programmes that enable refugees to access decent employment, promotion of official employment contracts).
- Ensure that **perpetrators** of war crimes, human trafficking and other severe forms of exploitation **are prosecuted** nationally and internationally<sup>114</sup> in a victim-friendly manner and victims are compensated – ensuring accountability through (among other things) early investigations of signals of potential trafficking as well as financial investigations including asset recovery.

#### **Anti-trafficking NGOs**

- Map which **online platforms** are used by displaced persons and refugees and check for their potential risks for human trafficking.
- Check indicators and patterns of **online sexual and labour exploitation**.
- Monitor, collect and analyse data related to online employment offers and become active in **online outreach** to provide information and support to refugees and migrants about employment offered online.
- Disseminate information about existing **hotline and support structures**.
- Establish and strengthen cooperation with **trade unions and migrant rights groups** to ensure adequate referral of exploited refugees and other migrants.

- **Assist victims in accessing justice** for all kinds of criminality committed in the wake of the Ukrainian war (including discrimination and human trafficking) by supporting potential victims in lodging complaints and filing reports.

#### **Donors**

- Invest in **training and capacity-building of first line responders** (including border personnel and volunteers) and ensure training aligns with existing capacity-building programmes and training curricula.
- Support civil society and/or governmental actions related to the **collection and monitoring of data** about risks/indicators and patterns (both online and offline).
- Provide funding and support for offline and online **information campaigns**.
- Facilitate the **development of specialised IT tools** (and training on how to use these) to law enforcement and specialist NGOs focusing on identification of victims of trafficking on online platforms.
- Provide capacity (including technological support) to strengthen, align and coordinate **hotline and helpline services** to ensure the early identification of trafficking cases and adequate reporting.

### 3 – To ensure adequate referral and assistance to potential trafficked persons

#### *Governments and international organisations*

- Strengthen **anti-trafficking structures and organisations** (responsible for hotline services and direct support to trafficked persons) and the implementation of National Action Plans and strategies both in Ukraine and in neighbouring countries.
- Provide **long-term support to local NGOs** that offer support (including legal assistance) to trafficked and exploited persons.
- Support general **protection and social inclusion programmes**, including long-term shelters for vulnerable refugees, language courses, skills assessments, vocational training and employment.
- Ensure the **right to work** and ensure employment opportunities **for people entitled to international protection**. Set up job placement schemes, counselling and vocational training through labour and employment services, and encourage employers to recruit qualified workers among the refugee population, enabling validation of their skills, education and professional backgrounds.

#### *Anti-trafficking NGOs*

- Align, strengthen and promote **helpline and support services** including the promotion of one specialist anti-trafficking number in each country.
- Ensure **cooperation** and adequate referral of trafficked persons among existing help and hotline services.
- Provide **training to helpline staff** – including staff of related helplines like 112 (the European emergency number for people in distress) – on recognising potential trafficking situations, what to do and where to report them.

- Strengthen **referral and support** to trafficked and vulnerable persons, including by expanding partnerships and networks to also allow for services to be provided abroad if necessary.

#### *Donors*

- Support anti-trafficking organisations and governmental actors to **extend their capacities** to offer services to trafficked people.
- Create sustainability by supporting existing anti-trafficking networks and organisations, including smaller initiatives, through **long-term flexible support** including core funding for maintaining core structures and services and being resilient to potential funding drops when attention for the situation of refugees from Ukraine diminishes.

## Annex 1:

# Research methodology

The research aimed to get a clear understanding of the current situation, the anti-trafficking response and the gaps that remain. It sought to answer the following questions:

- What are the main trafficking-related risks faced by refugees from Ukraine?
- What are the actual or potential pathways into trafficking for refugees from Ukraine, and how do these vary according to age, gender, nationality or other factors?
- What has been the response to date of governments, international organisations, civil society and community leaders?
- What are the gaps that remain?

The research consisted of desktop research, (online) interviews/discussions, a field visit to Poland, and a survey among La Strada International members and other national actors in Europe (16 respondents). People consulted for this research included:

- relevant national, regional and international actors in the anti-trafficking field including among others UNHCR (United Nations refugee agency), UNODC (United Nations Office on Drugs and Crime), OSCE (Organisation for Security and Cooperation in Europe), IOM (International Organisation for Migration), ILO (International Labour Organisation), EMPACT (European Multidisciplinary Platform Against Criminal Threats)
- national governmental actors in Poland, Romania and Moldova
- civil society actors both in Ukraine and abroad, including volunteers and translators
- refugees and displaced persons.

Information was collected since 24 February. Most interviews conducted specifically for the research took place between 23 March and 20 April 2022. More information is given below.

The research focused on all refugees fleeing Ukrainian territory because of the 2022 war, irrespective of their nationality or immigration status. In addition, the research also reviewed the risks for those that remain in Ukraine, including displaced persons in Ukraine.

As for the geographical area, this report focuses mainly on Ukraine and neighbouring countries that have received most refugees (Poland, Moldova, Hungary, Romania and Slovakia) and to a lesser extent Belarus and Russia, due to the limited possibilities for donors and NGOs to meaningfully contribute to the anti-

trafficking response in these two countries. Where relevant and feasible, the research also explores the response and the risks of trafficking of Ukrainians in transit and destination countries further afield, to which many refugees will move and where they are likely to also be vulnerable to trafficking risks.

### Interviews conducted for this research

Interviews consisted of online meetings and consultation and/or email correspondence unless otherwise stated, with representatives of:

- Adpare Romania (3, 20 April 2022)
- AIDRom Romania (15 April 2022)
- Council of Europe monitoring group GRETA (Group of Experts on Action against Trafficking in Human Beings) (29 March 2022)
- Dutch Ministry of Justice (online coordination meetings on Ukraine organised by the Ministry 28 March, 19 April 2022)
- Dutch National Rapporteur office (14 April 2022)
- ECPAT (April-May 2022)
- ECPAT/Defence for Children (12 April 2022)
- EMPACT (19 April 2022)
- EU Anti-Trafficking Coordinator/EU Civil Society Platform (25 March 2022)
- EU Commissioner Helena Dalli, Commissioner for Equality (6 April 2022)
- European platforms and bodies, including PICUM (Platform for International Cooperation on Undocumented Migrants), Red Cross, Missing Children Europe, Child Helplines International, ECPAT, Victim Support Europe, WAVE (Women Against Violence Europe), ESWA (European Sex Workers Rights Alliance); Child Circle, Lumos and Amnesty International (7, 9, 28 March, 12 April, 3 May 2022)
- Gender Funders CoLab (2 May 2022)
- GFEMS (Global Fund to End Modern Slavery) and Marriott Hotels (1 April 2022)
- GI-TOC (Global Initiative against Transnational Organised Crime) (25 April 2022)
- ILO (25 and 26 April)
- International Federation of Red Cross and Red Crescent Societies (7 April 2022)
- IOM Moldova (19 April 2022)
- IOM Romania (15 April 2022)

- IOM Regional Office (19 April 2022)
- La Strada Czech Republic (20, 23 April 2022)
- La Strada Moldova (19 April 2022)
- La Strada Poland (in-person meetings 8, 9 March and 10-13 April, online meeting 19 April 2022)
- La Strada Czech Republic (31 March 2022)
- La Strada International members (25, 28 February, 25, 28 March 2022)
- Oak Foundation (30 March 2022)
- OSCE, UNHCR, IOM (4 April 2022)
- Panel discussion on the perspectives of women, girls and LGBTQI+ people from Ukraine (12 April 2022)
- Red Cross, Dutch office (22 March 2022)
- Save the Children (7 April 2022)
- Sex Work Polska (19 April 2022)
- Stop the Traffik (March-April 2022)
- Task Force on Ukraine (20 April, 4 May 2022) including representatives of UNHCR, IOM
- Ukrainian refugees (9, 26 March, 2, 4, 11 April 2022)
- Ukrainian women's rights organisations, including World Federation of Ukrainian Women's Organisations, Ukrainian Women's Initiative in United Arab Emirates, Ukraine Government Commissioner for Gender Policy, Ukrainian Women's Fund, La Strada Ukraine, Women's Perspectives (24 March 2022)
- UNHCR, Geneva (22 March 2022)
- UNICEF, Poland (11, 14 March 2022)
- United Nations Special Rapporteur on trafficking in persons, especially women and children (11 March, 15 April 2022)
- UNODC (8, 23 March, 1, 28 April 2022)
- Women's Link Worldwide (24, 30 March 2022)

### 3-5 April 2022: Visit to Vienna/attendance at the OSCE Alliance Conference

- Council of Europe Convention on action against trafficking in human beings / GRETA (4 April 2022)
- OSCE-OSR (OSCE Office of the Special Representative and Co-ordinator for Combatting Trafficking in Human Beings) (4 April 2022)
- IOM Regional Office, based in Vienna (4 April 2022)

### 10-13 April 2022: Visit to Poland

- Civil society actors: La Strada – Foundation against Trafficking in Human Beings and Slavery (management, hotline consultants and lawyer), Homo Faber (Warsaw 10-11 April, Lupin 12 April 2022), Association for Legal Intervention (SIP) (13, 14 April 2022)
- Volunteers and refugees at Warsaw Central station and Warsaw and Lublin bus station and Chopin airport (10, 11, 12 April 2022)
- Representatives, Ministry of Interior; the Human Trafficking Department of the National Police; Border Guard Headquarters and Training Centre; and vice-mayor of Warsaw (11 April 2022)
- International actors in Poland; IOM and ODIHR (OSCE Office for Democratic Institutions and Human Rights).

## Annex 2:

# Participants in the anti-trafficking response

This annex provides brief details of participants in the anti-trafficking response identified by this research. The list is not exhaustive and does not include every participant in the effort to prevent and reduce trafficking of people affected by the war in Ukraine

### International and regional actors

To respond to current needs, **UNHCR** is active on the ground and has offices and personnel and has scaled up capacity in Ukraine and the neighbouring countries. UNHCR reopened its office in Moldova that was closed a few years ago. UNHCR conducts border monitoring in cooperation with NGOs to ensure that asylum seekers can enter and have access to adequate asylum procedures in the country. The agency provides refugees and asylum seekers with general and legal information. UNHCR further supports governments – among others in Romania – to improve resettlement and integration policies and to improve and strengthen the legal framework. In cooperation with NGO partners, UNHCR also organises awareness-raising and training sessions about the integration of refugees for government officials.<sup>115</sup> UNHCR – together with UNODC and IOM – coordinates the regional task force on human trafficking.<sup>116</sup>

**UNHCR** and **UNICEF** have set up **Blue Dots**, locations where professional, trained case workers, mental health and psychosocial support, and legal aid providers are available to identify support and protection needs and ensure that those needs are addressed. At these Blue Dots people are provided with information on protection risks and available services, and professionals can refer those with specific needs, such as survivors of gender-based violence, older persons, and persons with disabilities, to adequate assistance and support. Information is provided through multiple channels, in accessible and child-friendly formats, different languages, and in online/digital form. Blue Dots are established along anticipated routes of major refugee flows including at bus or train stations, at registration sites, in reception facilities, or at cash distribution points. The Blue Dots extend the government's national protection system and are linked with national and local referral pathways and services.<sup>117</sup>

**UNICEF** has focused on working with national authorities to make sure that children are protected, including work on strengthening the capacities of border authorities, supporting registration of children and national child protection systems to establish

referral pathways, identify unaccompanied and separated children, and monitor children's needs, in particular for children with special needs and disabilities. They have set up working groups to bring together different stakeholders on issues of child protection. They have further organised trainings with experts and their teams on the ground on trafficking in children and women, and protection risks related to separated and unaccompanied children.<sup>118,119</sup>

**UNODC** have also enlarged their staff in Moldova.<sup>120</sup> UNODC co-hosts the regional task force on human trafficking and is also represented in several countries close to Ukraine. UNODC is trying to support civil society actors from European countries surrounding Ukraine to exchange information and learning on the needs, useful tools and practices they have put in place to advise, detect and refer people at risk of trafficking due to the conflict. They launched KNOWTS, an online knowledge hub for civil society actors to continue to exchange and to have access to different resources related to the anti-trafficking response to the war in Ukraine.

**IOM** is based in Ukraine, as well as in Poland, Moldova, Romania, Slovakia and Hungary, and has scaled up actions and increased staffing. IOM supports governments in migration management and addressing forced migration. IOM is screening and assessing potential vulnerabilities and risks, including for human trafficking, child protection, health and mental health, and the arrival of more vulnerable people with special needs, including elderly, wounded or sick people<sup>121</sup> and has provided legal support, psychosocial support and humanitarian support.<sup>122</sup> IOM is collaborating with border agencies and government partners to implement trafficking prevention mechanisms and operates regional hotlines to provide people on the move with important safety and resource information. IOM in Ukraine, Romania and Moldova has developed online materials related to safe migration and counter-trafficking, which connect people fleeing Ukraine with vital accommodation, transportation, and trafficking reporting resources.<sup>123</sup>

**ILO** is working with unions on awareness of human trafficking related to the war in Ukraine. ILO cooperates with employers' organisations on preventing the risks of labour exploitation. In Ukraine, ILO is working with the labour inspectorate on undeclared work and will now also focus more on the trafficking risks related to the war. This work is based on the handbooks for employers that already



exist. ILO is training companies in Ukraine that have moved to the Western part of the country to support organisations and ensure active listening. ILO also works with the unions on the construction sector, where they provide legal employment in the EU, using existing structures.

Several **regional and international observatory bodies** that do not work 'on the ground' have provided recommendations for countries to prevent trafficking, raised awareness, pushed governments to take adequate action and issued statements, guidelines and recommendations related to trafficking-related risks and Ukraine.

The **UN Special Rapporteur on trafficking in persons, especially women and children** together with the UN Special Rapporteur on violence against women, its causes and consequences, and the UN Under-Secretary-General and Special Representative of the Secretary-General on Sexual Violence in Conflict expressed in their statement serious concerns about the heightened risks of sexual violence, especially trafficking in persons, impacting significantly women and children that are displaced.

The **Council of Europe Secretary General** highlighted the vulnerability of women and girls to sexual violence as they try to escape conflict.

**GRETA (the Group of Experts on Action against Trafficking in Human Beings)** issued a statement on the importance of adequate procedures to ensure early identification of victims of trafficking among those fleeing the war and enable them to exercise their rights to assistance, protection and compensation. The President of GRETA called for prevention of fraudulent offers of transportation, accommodation and work, and the strengthening of safety protocols for unaccompanied children linked with national child protection systems.<sup>124</sup> GRETA has published a guidance note for states to provide immediate assistance to people fleeing Ukraine and detect potential victims and traffickers.

The **OSCE-OSR** called upon states to welcome and assist people seeking refuge and issued a set of concrete recommendations for countries to prevent trafficking,<sup>125</sup> including guidance for immediate prevention measures and responses to pressing needs, policy measures to prevent and mitigate vulnerabilities, and to enable the integration of refugees into host communities. In addition the office launched recommendations on enhancing efforts

to identify and mitigate risks of trafficking in human beings online as a result of the humanitarian crisis in Ukraine.<sup>126</sup>

The **European Union** offers political, financial and humanitarian assistance to Ukraine and has put together information for people fleeing Ukraine<sup>127</sup> which includes information about rights to temporary protection and practical information on education, health, housing and jobs, as well as on protection for children and staying safe while travelling in the EU. The Commission has issued operational guidelines and provided extra staff and expertise to help border guards in member states to manage arrivals at the borders with Ukraine. The Commission has set up a dedicated European system for swift transfers of persons in need of medical care among EU member states, supported by the EU Civil Protection Mechanism. The Commission is also preparing dedicated Standard Operating Procedures for transfers of unaccompanied minors and will pilot a new talent pool to match people with job vacancies alongside other initiatives to assist people into work.<sup>128</sup> On 28 March 2022, the Commission presented a 10-Point Plan for stronger European coordination on welcoming people fleeing the war against Ukraine.<sup>129</sup>

Nine **EU agencies** are working closely together on freedom, security and justice in the EU and now jointly on the EU response related to Ukraine. These are the European Institute for Gender Equality (EIGE), the European Monitoring Centre for Drugs and Drug Addiction (EMCDDA), the European Union Agency for Asylum (EUAA), the EU Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA), the EU Agency for Criminal Justice Cooperation (Eurojust), the EU's Law Enforcement Agency (Europol), the EU Agency for Fundamental Rights (FRA), the European Border and Coast Guard Agency (Frontex) and the European Agency for Law Enforcement Training (CEPOL).

The **European Union Agency for Asylum (EUAA)** is mandated with supporting member states in applying the package of EU laws that governs asylum, international protection and reception conditions, known as the Common European Asylum System (CEAS). The agency does not replace national asylum or reception authorities, which are responsible for their own procedures and systems. On 7 March 2022, the Executive Director of the EUAA appointed the Ukraine Emergency Response Board (UERB) in order

to coordinate the agency's efforts to support member states with Ukraine-related asylum and reception needs, as well as assist in their implementation of the EU Temporary Protection Directive.<sup>130</sup>

**EURES** is a European cooperation network of employment services between the European Commission, the European Labour Authority, the national public and other admitted employment services in all the EU countries, Iceland, Liechtenstein, Norway and Switzerland. EURES facilitates the free movement of workers by providing information and employment support services to workers and employers, and by enhancing cooperation and information exchange between its member organisations. Among other things, EURES provides information about living and working conditions in Europe.

**Europol** has deployed operational teams to the countries neighbouring Ukraine to support national authorities with "secondary security checks and investigations at the European external borders to identify criminals trying to enter the EU in the refugee flow and exploit the situation". These operational teams also gather field information to be used to develop criminal threat assessments at the European level and to support investigations.<sup>131</sup> The EMPACT network and Europol will support member states to ensure maximal vigilance against organised crime and trafficking groups and ensure the enforcement of EU sanctions against Russian and Belarussian individuals. In March 2022, Europol released an Early Warning Notification in which they urged European countries receiving refugees from Ukraine to remain alert for indications or attempts to recruit potential victims of trafficking in human beings.<sup>132</sup>

Europol and the **European Labour Authority (ELA)** co-organised a meeting of the **European Multidisciplinary Platform Against Criminal Threats (EMPACT)** on trafficking in human beings for the purpose of labour exploitation. Joint actions of ELA, Europol and EMPACT focus on preventing, investigating and prosecuting any instances of trafficking in human beings and labour exploitation.

**INTERPOL** deployed an Operational Support Team to Moldova within the framework of the organisation's response to the ongoing conflict in Ukraine. Coming at the request of Moldova's INTERPOL National Central Bureau in Chisinau, the mission is providing on-the-ground support to law enforcement and humanitarian agencies managing the large outflow of refugees

from Ukraine entering Moldova. The INTERPOL team will consult and cooperate with Moldova's General Inspectorate of Police, the General Inspectorate of Border Police, as well as international organisations such as UNHCR, UNICEF and IOM in areas such as human trafficking, migration and border management.

**Frontex** has taken proactive measures to prevent, identify and tackle human trafficking. It has organised awareness sessions for first and second line investigating officers and has deployed human trafficking investigators in the EU member states bordering Ukraine.

The **EU Anti-Trafficking Coordinator (ATC)** is drafting a common anti-trafficking plan, which was announced under point 6 of the Commission's 10-Point Plan for stronger European coordination on welcoming people fleeing the war against Ukraine.<sup>133</sup> The ATC coordinates the EU Civil Society Platform on Trafficking in Human Beings, which brings together nearly 100 participants from across the EU and beyond.<sup>134</sup> On 25 March 2022, it organised an online meeting for platform members to discuss the current situation in relation to trafficking in human beings, to exchange information on victim support and to see what can be done to support civil society in counter-trafficking actions.

### Civil society actors

Alongside governmental actors, there are several international/European civil society networks that work on the prevention of human trafficking and support trafficked persons.

**La Strada International (LSI)** is a European anti-trafficking network with 30 members in 24 European countries including Ukraine, Poland, Moldova and Romania, which are all part of National Referral Mechanisms and support structures.<sup>135</sup> LSI members provide information, legal advice, helpline support, and if needed relocation and psychosocial support and accommodation for trafficked people from Ukraine and other countries. They also support trafficked persons with legal support and claiming their rights.

**ECPAT's** mandate is to end the sexual exploitation of children. It comprises 122 members in 104 countries, who advocate for children's rights or offer psychological, medical, legal and other support to children. The All-Ukrainian Network against Commercial Sexual Exploitation of Children became an ECPAT member group in 2004. The network comprises 20 member organisations from the government,

non-governmental and private sectors and one individual member. The work of the network covers the prevention of the commercial sexual exploitation of children (CSEC) and child trafficking as well as the protection, rehabilitation and reintegration of child victims of CSEC.

Another children's rights organisation that operates at European level and is currently providing support to Ukrainian refugees is **Child Helpline International**, a collective impact organisation with 167 members from 140 countries, which established a 'Ukrainian crisis resource centre', containing relevant sources of information for child helplines providing information and advice to children affected by the war in Ukraine.

**Missing Children Europe**, which connects 31 grassroot organisations in 26 countries across Europe, supports professionals working to protect and empower children and prevent them from going missing through research, training, advocacy and awareness. They coordinate the 116000 number for missing children in Europe. At the end of April 2022 a Ukraine Hotline helpdesk became operational.

Other organisations include **Save the Children**, which has been active in Ukraine since 2014. Their specialist teams are providing children with access to safe, inclusive, quality education and are working with schools and community centres to help children overcome the mental and psychological impacts of their experiences of conflict and violence.

**Child Circle**, **Lumos** and **Hope and Homes** have raised awareness about the need for de-institutionalising of provision for children in care. Child Circle, a centre of expertise on children's rights, is working on a paper on 'guardianship' and what this means in different European countries, including explaining this to people from Ukraine.

Religious networks against human trafficking include the **Churches' Commission for Migrants in Europe (CCME)**, **RENATE: Religious in Europe Networking Against Trafficking and Exploitation, Salvation Army**, and **Caritas**. They have members in different European countries<sup>136</sup> who provide direct assistance and awareness raising and coordinate anti-trafficking projects and programmes, partly implemented by volunteers.

Organisations that provide support to refugees which also work on the prevention of human trafficking include the **Red Cross**, which has been

providing support across border routes with Ukraine and disseminating prevention materials (including via social media channels of the local Red Cross foundations); and the **European Council on Refugees and Exiles (ECRE)**, a network of 105 NGOs in 39 European countries which disseminates legal information for Ukrainian (and other) refugees on international protection. ECRE members are largely responsible for assistance to refugees at national European level.

Further there are several networks that support victims of crime or specific vulnerable groups for exploitation and abuse. **Victim Support Europe (VSE)** represents 65 national member organisations providing support and information services in 31 countries. VSE promotes the establishment and development of victims' rights and services throughout Europe. For Ukrainian refugees they provide information on health and victim support services, as well as on trauma care, including for those assisting refugees.

**WAVE** is a network of over 150 European women's NGOs working towards prevention and protection of women and children from violence. They build the capacity of members, advocate for better legislation, conduct research and raise awareness on violence against women and girls.

**PICUM** advocates for the rights of undocumented persons in Europe and **ESWA** – a sex worker-led network representing more than 100 organisations in 30 countries across Europe and Central Asia – advocates for sex workers' rights. **ILGA Europe** advocates for the rights of lesbian, gay, bisexual, trans and intersex persons in Europe.

There are also many other migrant rights and women's rights organisations that have conducted programmes on the prevention of human trafficking, including the **Migrant Women Network (MWN)** and **European Women's Lobby (EWL)**.

**The European Trade Union Confederation (ETUC)** and the **International Trade Union Confederation (ITUC)** support workers' rights, together with national trade unions. In Ukraine, trade unions have been providing support to internally displaced people and refugees.

Most of the networks mentioned above have members in Ukraine and/or in other EU countries and in particular support information provision including risk materials, provide support to their members

in Ukraine or in neighbouring countries, and have established crowdfunding actions to do so.

Other relevant civil society actors include **Amnesty International**, **Human Rights Watch** and other human rights organisations, represented by the **Human Rights Democracy Network (HRDN)**. They have raised concerns about violations of human rights in Ukraine and also monitor and report on the situation of rights protection in neighbouring countries, including collecting evidence and testimonies of rights violations in Ukraine and in neighbouring countries including Russia and Belarus.

Lastly, there are also lawyers' organisations providing legal assistance to refugees in Europe. The **European Young Bar Association** has established a pro bono list of experts in migration law, refugee law and human rights for Ukrainian nationals. **PILnet** offers pro bono legal support to those supporting Ukrainians and has launched several legal resources for NGOs.

## National actors

Since the Russian invasion, neighbouring countries and other EU member states have established national task forces (sometimes as part of crisis structures) or meetings to discuss and coordinate prevention of human trafficking related to Ukraine. These task forces include both governmental and civil society actors.

In **Ukraine**, the Ministry of Social Policy is the national coordinator for Ukraine's anti-trafficking policy and the recently created National Social Service is in charge of implementation of the policy. The previous State Social Anti-Trafficking Program has expired and no new programme has yet been developed or adopted.

A network of NGOs, the All-Ukrainian Counter-Trafficking Coalition, comprises 31 NGOs based in different parts of the country, which provide services to victims of trafficking. La Strada Ukraine, established in 1997, is running a helpline and anti-trafficking hotline in the country. They provide 24/7 consultations via telephone and in online format (Facebook, Telegram, Instagram, etc) and work on awareness raising and preventive activities. La Strada Ukraine cooperates with other organisations and institutions in different regions of Ukraine, including the rehabilitation centre run by IOM in Kyiv, to ensure adequate referral of potential victims of trafficking.

The government, IOM and civil society actors, together with humanitarian actors, provide information and

consultation to refugees and internally displaced people, and offer relocation, shelter and referral services. Under the Protection cluster led by UNHCR, a working group or task team on human trafficking is being set up and comprises the most relevant actors.<sup>137</sup>

In **Poland**, there is no formal National Referral Mechanism on the issue of human trafficking. However, in practice, there is cooperation among all relevant stakeholders and they are well aware of each other's services. Every few years, a new National Action Plan is adopted, which describes the activities to be undertaken by different stakeholders.<sup>138</sup> The last Plan was adopted in 2021 for the period 2022-2025.<sup>139</sup>

Currently the Ministry of Interior and Administration takes up the anti-trafficking coordination role. Other relevant ministries with a role in preventing and combating human trafficking in Poland include the Ministry of Family Labour and Social Policy; Ministry of Foreign Affairs; Ministry of Health; and the Ministry of Education. The Polish police has a specialised Unit to Combat Trafficking in Human Beings within the Criminal Service Office of police headquarters. In Poland the police, border guard or prosecutor can issue a certificate confirming the existence of a presumption of victimhood and offer a reflection period to victims. The Polish Labour Inspectorate controls the legality of foreigners working in Poland and whether the labour law is respected and the rights of workers are violated by employers. Prevention programmes are carried out involving employees and workers, and the inspectorate can take action if they decide rights have been violated.

Preventive action that has been taken since February 2022 includes:

- A 'special letter' was sent from the Polish government to border guards and the police to watch for signs of human trafficking.
- A 'message alert' was sent from the Polish government to the mobile phones of Ukrainians, containing basic information and telephone numbers for further help.
- Information leaflets have been issued to border guards to distribute at passport control.
- All children and adults are registered at the border crossing. (During the first three days it was not possible to register everyone.)
- A number of politicians have called in the Polish Parliament for an increase in sentences for perpetrators who exploit Ukrainians.

The La Strada Foundation against Trafficking in Persons and Slavery (La Strada Poland) is a specialised expert and advisory centre on the issue of trafficking in human beings.<sup>140</sup> Together with the Catholic support organisation PoMOC, the organisation runs the National Intervention and Consultation Centre for Victims of Human Trafficking (KCIK), providing comprehensive support to victims of trafficking, including services such as counselling, accommodation, medical care, legal and psychological aid. La Strada Poland also runs a helpline for trafficked persons.

Other relevant NGOs that work in Poland on advocacy, prevention, direct (psychological) assistance to victims of human trafficking, offering legal aid and/or organising training programmes and social campaigns are mostly part of the National Network of NGOs Against Human Trafficking – established and led by La Strada Poland – and this network is currently also part of the ‘Emergency group on Ukraine’ include Empowering Children,<sup>141</sup> Halina Nieć Legal Aid Centre,<sup>142</sup> ITAKA Foundation,<sup>143</sup> Caritas,<sup>144</sup> the Association for Legal Intervention (SIP)<sup>145</sup> and Nasz Wybor, a self-organisation of Ukrainians in Poland.<sup>146</sup>

There are also many other NGOs that support migrants in Poland, including workers’ rights organisations, the Helsinki Foundation for Human Rights and Homo Faber. Many of these organisations work with volunteers. There are also volunteers from the scout movement and the Red Cross active in Poland to provide information – especially at borders and at train and bus stations – and from many other smaller and bigger organisations.

IOM, La Strada Poland and other actors are closely cooperating with state actors to raise awareness about the issue of human trafficking. The border police also provide information and disseminate prevention leaflets and other relevant information at the border. Together with the police and labour inspectorate, they monitor the trafficking situation. Potential trafficked persons that are identified by them are referred to KCIK.

In **Romania**, the government is coordinating actions related to Ukrainian refugees in partnership with international and civil society organisations. In February 2022, a high-level decision-making task force, coordinated by the Prime Minister, and an operational task force were set up to oversee the activities of the ministries involved. A separate Humanitarian Assistance Strategic Coordination Group was established to ensure the strategic

framework of the humanitarian response and to facilitate inter-agency cooperation among national, European and international partners.

In addition, the government has set up six working groups that have the role to design inclusion and protection policy measures in the form of sectoral action plans in the areas of health, education, labour, housing, vulnerable persons, and children and youth. The sectoral action plans will be combined into a National Action Plan, representing Romania’s Second Protection Response to the humanitarian crisis.

Alongside governmental actors, there are several non-governmental actors in Romania who play an essential role in addressing trafficking in the country. These include La Strada International’s member, the Association for Developing Alternative Practices for Education and Reintegration (ADPARE),<sup>147</sup> as well as AIDRom,<sup>148</sup> Reaching Out, Generate Tănără Timișoara, Betania Association, Pro Refugio, People to People in Oradea and the Association Global Help Cariova.

There are also a few NGOs supporting migrant workers and other vulnerable groups. Organisations that support refugees and migrants include the Romanian National Council for Refugees (CNRR)<sup>149</sup> and the ICAR Foundation.<sup>150</sup> In recent years foreign-funded organisations and initiatives have started operating in the country including International Justice Mission (IJM) and Justice and Care, who have offices in Romania and are part of the national network of NGOs.

The government set up a Dopomoha (meaning ‘help’ in Ukrainian) platform in partnership with civil society to support Ukrainian refugees with information about their rights in Romania,<sup>151</sup> including through leaflets with information on facilities for refugees from Ukraine.

According to civil society organisations, the border area is “completely controlled, meaning that no one can enter without being registered”: “To be allowed in the border area, you need to have a badge and a jacket. The colour of the jacket reveals your function at the border (NGO, interpreter, et cetera). In this way no one can come to the border and take people from the area without being noticed.”<sup>152</sup> Safe transportation is being offered by NGOs set up by law enforcement actors, such as the Blue Knights Romania III. IOM Romania also provides safe transportation. IOM and embassies support the relocation of Ukrainians to other European countries



and of non-Ukrainians to their countries of origin.

In **Moldova**, the government approved the National Strategy for Preventing and Combating Trafficking in Human Beings (2018-2023) and the Action Plan for its implementation in the period 2018-2020. In addition, the procedures of inter-institutional cooperation within the National Referral Mechanism were standardised.

IOM and La Strada Moldova have been closely cooperating for years. There are two specialised national shelters for victims of human trafficking: one for women that was established in 2001 and a second special state shelter for men who have been trafficked that was set up in 2021. IOM supports both shelters financially. La Strada Moldova runs an anti-trafficking and safe migration hotline (0800777777) and a National Women and Girls' Trust Line (080088008) related to violence against women. In addition, La Strada Moldova offers psychological and legal support to women and children. La Strada Moldova also has a mobile group to identify and assist cases of human trafficking in different administrative areas of the country.

IOM and La Strada Moldova are taking a leading role in the anti-trafficking response related to the war in Ukraine, as the government lacks sufficient capacity to deliver more anti-trafficking efforts. Both organisations, together with others, have scaled up mobile groups and started to provide information to refugees, including information about anti-trafficking hotlines and other services available for victims of human trafficking.

Some state agencies also run hotlines for trafficked persons and refugees from Ukraine. The specialised police unit, the Centre for Combating Trafficking in Persons under the Ministry of Internal Affairs, runs a hotline to report trafficking crimes. The Bureau for Migration and Asylum under the Ministry of Internal Affairs launched at the beginning of March 2022 a new hotline (080001527) to inform Ukrainians how they can apply for asylum, obtain temporary accommodation and get a residence permit in Moldova. The running of a hotline which was created under the State Chancellery at the end of February 2022 to provide information for Ukrainian refugees was transferred to a private company in April 2022.

Since the war in Ukraine started, La Strada Moldova with support of IOM Moldova and UNHCR has printed

and distributed leaflets with information about its anti-trafficking hotline (0800777777). Around 150 calls from Ukrainian refugees were registered over the period March-April 2022. Many of these calls related to questions about obtaining humanitarian and financial aid, renting apartments, recovery of identity documents, etc.

### Donors

When the war broke out the donor community reacted quickly to provide support. Candid, an information services company, collects data on funding provided in response to the crisis in Ukraine. By early May 2022, it had recorded 791 grants worth \$1,047,281,397 since the war began. In addition to grants, Candid has tracked 157 pledges worth \$679,970,680.<sup>153</sup> The amount related to the anti-trafficking response is not yet known: it might be good to evaluate this at a later stage.

Donors that have been investing in anti-trafficking responses include UN bodies and the European Commission, also Open Society Foundations, Sigrid Rausing Trust and Choose Love. It is not always clear how much funding is specifically for trafficking-related work, or for responses with a broader focus that also include trafficking-related work. Again, this is something that it would be useful to evaluate.<sup>154</sup>

### Public-private partnerships

Private sector donors have also been providing support to the anti-trafficking response and to refugees from Ukraine. For example, Marriott hotels are donating free and discounted rooms to Ukrainian refugees, and the online platform Hospitality Helps<sup>155</sup> is providing a map of all hotels that helps to connect families to hotel rooms. Marriott hotels further hope to support relief efforts by offering job opportunities for Ukrainian refugees and is in the process of setting up a dedicated website to help connect refugees to those opportunities.<sup>156</sup>

In March 2022, the IOM and Airbnb.org announced a partnership to connect people fleeing from Ukraine to free, short-term housing in Poland, Moldova, Romania, Hungary and Slovakia. Airbnb.org committed to offer housing for up to 100,000 refugees fleeing Ukraine.<sup>157</sup> There have also been many other initiatives to set up online platforms to match Ukrainian jobseekers with employers.

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- 129 [https://ec.europa.eu/home-affairs/10-point-plan-stronger-european-coordination-welcoming-people-fleeing-war-ukraine\\_en](https://ec.europa.eu/home-affairs/10-point-plan-stronger-european-coordination-welcoming-people-fleeing-war-ukraine_en)
- 130 <https://euaa.europa.eu/euaa-response-war-ukraine-vidpovid-euaa-agentstvo-evropeyskogo-soyuzu-z-pitan-pritulunka-viynu-v>
- 131 Europol press release, 1 April 2022.
- 132 [https://www.europol.europa.eu/cms/sites/default/files/documents/Early\\_Warning\\_Notification\\_\\_War\\_in\\_Ukraine\\_-\\_refugees\\_arriving\\_to\\_the\\_EU\\_from\\_Ukraine\\_at\\_risk\\_of\\_exploitation\\_as\\_part\\_of\\_THB.pdf](https://www.europol.europa.eu/cms/sites/default/files/documents/Early_Warning_Notification__War_in_Ukraine_-_refugees_arriving_to_the_EU_from_Ukraine_at_risk_of_exploitation_as_part_of_THB.pdf)
- 133 [https://ec.europa.eu/home-affairs/10-point-plan-stronger-european-coordination-welcoming-people-fleeing-war-ukraine\\_en](https://ec.europa.eu/home-affairs/10-point-plan-stronger-european-coordination-welcoming-people-fleeing-war-ukraine_en)
- 134 [https://ec.europa.eu/anti-trafficking/eu-civil-society-platform-and-eplatform-against-trafficking-human-beings\\_en](https://ec.europa.eu/anti-trafficking/eu-civil-society-platform-and-eplatform-against-trafficking-human-beings_en)
- 135 General activities undertaken by La Strada International members include direct and indirect social support and empowerment programmes for trafficked persons and risk groups including (psycho) social, medical, legal and vocational support, shelter services, long-term reintegration and employment support, provision of consultations and referral via national hotlines, prevention lectures and trainings to professional groups, awareness-raising, lobby, advocacy and media campaigns. A lot of information and referral support is now provided to Ukrainian refugees, including via hotlines and consultancy services, and the first requests for assistance for potential trafficked persons from Ukraine have been received.
- 136 ICCO newsletter, 22 March 2022.
- 137 <https://www.humanitarianresponse.info/operations/ukraine/protection>
- 138 La Strada International, Rights at work: Tackling labour exploitation in Poland, Bulgaria and Romania, 2019, <https://documentation.lastradainternational.org/Isidocs/3301-RaW%20Tackling%20labour%20exploitation%20-%20final.pdf>
- 139 Interview La Strada Poland, interview, 10 April 2022.
- 140 The organisation works in particular on lobbying, prevention and direct social assistance to victims of human trafficking. La Strada provides trafficking victims with support in the form of accommodation, food, psychological and legal counselling and accompanying clients during contact with law enforcement and judicial authorities. Foreign clients also receive support in legalising their stay. The organisation helps victims in getting their unpaid remuneration back.
- 141 Empowering Children organises training programmes related to child abuse for various professional groups and interdisciplinary teams, and provides psychological assistance to unaccompanied children and child victims of trafficking.
- 142 Halina Nieć Legal Aid Centre organises social campaigns and offers free legal aid to victims.
- 143 ITAKA Foundation seeks missing persons and helps the families of trafficked persons or persons who have lost contact with family.
- 144 Caritas Poland supports women who were forced into sex work or forced labour.
- 145 SIP provides legal counselling and information to migrants and refugees regardless of their legal status.
- 146 Nasz Wybor focuses on integration and protection of migrants – in particular Ukrainian migrants – supporting them to have access to information in order to obtain their rights. They publish a daily online newspaper and a monthly magazine in Polish and Ukrainian. For several years the organisation has run the 'Ukrainian house', which includes a legal advice and consultation desk where migrants, in particular Ukrainians, can get advice and legal support to find employment, education, housing, obtain legal status and/or other issues related to their integration. Awareness raising and prevention programmes are also carried out. Some related information campaigns have been conducted by the organisation.
- 147 ADPARE raises public awareness about human trafficking and promotes the rights of trafficked people, providing assistance and reintegration programmes for victims and those at risk, as well as facilitating access to government and non-governmental services that carry out similar activities. Since the war in Ukraine started, ADPARE staff have volunteered at the North Railway Station in Bucharest supporting mothers and children and offering them safe transport to accommodation, medical assistance, information on the services they can benefit from, accompaniment at the food distribution points and medical consultation points, support for pets' company; all these activities are carried out under the coordination of the Emergency Inspectorate Bucharest. The volunteers' activities are carried out in partnership with volunteers from Blue Knights Romania (police motorcycle club) and White Knights Romania (doctors, paramedics, nurses motorcycle club).
- 148 AIDRom operates three regional counselling centres in Romania, offering complex social assistance to vulnerable groups. They also host a safe house for victims of human trafficking and two shelters for asylum seekers, in strong cooperation with the Romanian governmental authorities. AIDRom offers integration programmes and arranges accommodation for refugees to move to apartments, as well as medical insurance for up to a year. The integration plan is conducted in cooperation with the Inspectorate of Migration office of integration. AIDRom has legal counsels for labour issues who can start civil procedures to claim unpaid wages.
- 149 CNRR promotes human rights, in particular the rights of migrants, refugees and asylum seekers. The Council offers specialised legal counselling for registered asylum seekers in all reception centres in Romania (Bucharest, Galati, Timisoara, Maramures and Radauti) and for those living in other locations, including transit areas and at border crossing points. It further offers specialised assistance for vulnerable groups: unaccompanied children, single women, elderly people, etc. The Council works on research and provides information to relevant stakeholders, including capacity building for, among others, lawyers, translators and other professionals. Migrants are also supported, for example those that received return decisions and others. CNRR employs a social counsellor and integration officer, both working on a project for UNHCR. This project offers legal counselling and support related to social issues and issues of integration. The organisation is the monitoring body for forced returns from Romania to countries of origin.
- 150 ICAR foundation focuses on severe human rights violations, including human rights violations committed by states. Their focus has been mainly on support to victims of torture, including victims of the communist era. The work of the organisation includes: litigation cases, documenting cases, providing direct medical and psychosocial support to victims and vulnerable groups such as migrants and refugees, lobbying and advocacy. Together with AIDRom they offer health services to all refugees who need it. ICAR reports cases of mistreatment by authorities, focusing in particular on the target group of refugees.

- 151 [www.dopomoha.ro](http://www.dopomoha.ro)
- 152 AIDRom, interview, April 2022.
- 153 <https://topics.candid.org/issue-pages/ukraine/>
- 154 Gender Funders Co\_lab, email correspondence, see <https://www.genderfunderscolab.org/>
- 155 <https://hospitality-helps.org/en/home>
- 156 [www.welcome.marriott.com](http://www.welcome.marriott.com)
- 157 IOM, Partnership with Airbnb to support those fleeing Ukraine, 8 March 2022, <https://mailchi.mp/a22ec6dfe116/partnership-with-airbnb-to-support-those-fleeing-ukraine-6172152?e=73001ddff>



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