



POLICY BRIEF

What governments need to know about vulnerability to trafficking among the people fleeing the war in Ukraine

ICMPD Anti-trafficking Programme

August 2022

6.3 million refugees
from Ukraine recorded
across Europe

Executive Summary

The war in Ukraine has been raging for six months. The number of people who have fled the war in Ukraine only to Europe has passed **6.3 million** while more than **6.6 million** were displaced internally within Ukraine. A considerable number of countries, first and foremost Ukraine's neighbouring countries, but also other countries, including EU members that have been most affected by the influx of people fleeing the war, have made significant efforts to respond to their arrival.

So far, the incidence of human trafficking cases among those fleeing the war in Ukraine has remained insignificant. Still, people who fled the conflict are seeing their personal resources (be of financial or emotional nature) depleted with grimmer perspectives; As their displacement protracts, their vulnerability to exploitation, including trafficking, increases. These vulnerabilities need to be addressed now to avert the descent of a secondary crisis among displaced populations in their host communities later on. The persisting nature of the risks is well illustrated e.g. by 'huge spikes' in online searches across multiple languages and countries for explicit content and sexual services from Ukrainian women and girls.¹

The existing research by the International Centre for Migration Policy Development (ICMPD) has demonstrated how people fleeing the conflict become vulnerable to human trafficking. In this Policy Brief, we examine the nature of these vulnerabilities and provide guidance as to where the countries hosting the people displaced by the war need to invest their attention and efforts to tackle the increased dangers of human trafficking.

1. Organization for Security and Co-operation in Europe (OSCE). Recommendations on enhancing efforts to identify and mitigate risks of trafficking in human beings online as a result of the humanitarian crisis in Ukraine. Available [here](#).



Humanitarian crisis
at risk of becoming a
trafficking crisis

TRAFFICKING IN HUMAN BEINGS AND PEOPLE FLEEING THE WAR IN UKRAINE

What shapes a person's vulnerability

International mechanisms and organisations fighting trafficking in human beings from the very outset of the crisis sounded the alarm of the nature and magnitude of vulnerabilities of the people fleeing the war in Ukraine to exploitation and abuse, including to trafficking. In order to understand the challenges in the current situation, we need to understand the depths of the phenomenon of **vulnerability** and its parameters. According to the Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children (2000) to the United Nations Convention on Transnational Organized Crime, the abuse of an individual's position of vulnerability is one of the means that the criminals can use when committing the crime of human trafficking. The UN Inter-Agency Coordination Group against Trafficking in Persons (ICAT), which ICMPD is co-chairing with the UN Office on Drugs and Crime (UNODC) in 2022, defines vulnerability as a notion that includes three factors – personal, situational, and contextual.

Personal vulnerability factors include aspects that are an integral part of an individual (e.g. age, sex, gender, ability, disability, ethnicity or sexual orientation). Such personal characteristics do not make a person vulnerable on human trafficking on a standalone basis, yet they may intersect with other vulnerability factors and exacerbate the overall vulnerability of a person to human trafficking in particular situations and in different contexts. **Situational vulnerability** factors relate to temporary challenges that negatively affect the person in course of a certain period of time, such as irregular migration status. **Contextual vulnerability** factors refer to the effect of the external context surrounding the person and exerting its negative effect on that person (such as certain policy frameworks, social norms or humanitarian crises, including those resulting from armed conflicts).

Contextual vulnerability factors, albeit in combination with the other two, considerably exacerbate the vulnerability of people fleeing the war in Ukraine while increasing the risks posed by traffickers who see the situation as an opportunity. The data below (as of 17 August 2022) illustrates well the scale at which these factors can operate:

- **6.3 million** refugees from Ukraine recorded across Europe,
- **Only 3.8 million** refugees registered for Temporary Protection or similar national protection schemes, and
- **Over 6.6 million** internally displaced persons (IDP) within Ukraine. (data as of 12 August).

Vulnerabilities to trafficking in human beings of people fleeing the war in Ukraine

The authorities managing the **humanitarian response** in situations like these need to understand the vulnerabilities faced by those fleeing the conflict, in order to calibrate their identification and protection responses appropriately. These include, for instance:

- The interplay between severe **impoverishment** of displaced people and **shortfalls in the provision of humanitarian aid**, both financial and in-kind, triggers desperate situations among populations concerned;
- The **lack of information** on what opportunities for travel and residence are available, adds to the insecurity and impossibility to take informed and safe decisions. In such circumstances, they may engage in risky coping strategies – accepting offers for shelter, transportation or fast money, without assessing the risks and ending up in an exploitative situation;

- Lack of **centralised coordination** of registration and referral services (at both national and European level) can lead to many vulnerable persons falling through the cracks of the registration and referral systems with private drivers involved in the transportation, or ambiguous response to potential risks of mistreatment or abuse of the arrivals;
- Low or no awareness among the first responders on the **potential risks for abuse, exploitation and human trafficking**;
- Vulnerability to exploitation affects also people who live in the area of actual military conflict or are **internally displaced** and must adapt their lives to the prevailing insecurity. Especially vulnerable and in need of assistance are those prevented from leaving the country because of their **special (medical or age-related) needs** - elderly and sick people, residents of care institutions, hospitalised persons, children from orphanages and other institutions together with their family members and care-givers.

A recent rapid assessment by La Strada International and The Freedom Fund confirmed the first two from the above list as factors that increase the vulnerability to human trafficking of the people fleeing the war in Ukraine, and also identified the following additional factors:

- **Exposure to risks** online as traffickers are already using social media to target potential victims;
- **Criminal networks already operating in the region** that might be 'enjoying' more freedom due to the challenges of law enforcement in the areas affected by conflict or experiencing a large influx of refugees;
- **Pre-existing risk factors**, particularly the high prevalence in Ukraine of **domestic violence** (generally a push factor for human trafficking) prior to the war, and vulnerabilities from **secondary displacement** or having lived in the conflict-affected territories in Ukraine since 2014.

In July, ICMPD conducted a rapid assessment among the selected Prague Process participants hosting considerable numbers of Ukrainians that fled the war. Only one of the respondent countries informed of two underage females identified as victims among those displaced from Ukraine. Of the **current challenges**, the authorities mostly highlighted the language barrier, which some are addressing by providing all information campaigns on the dangers of human trafficking in multiple languages, including Ukrainian and English. Importantly, they highlighted the problem of not all those who fled the war being centrally **registered** (nor all those persons or families who have taken in the displaced Ukrainians). Paying adequate attention to underage persons, particularly unaccompanied minors was reported as a particular challenge. The authorities are aware that the longer the displacement continues the more vulnerable people will become. The expectation is that in addition to those with financial resources to support themselves fleeing the conflict in the early days, also those with fewer financial resources would be leaving Ukraine as the war protracts, making them vulnerable to exploitation and traffickers.

Assessing possible **future challenges** with the displaced Ukrainian community, the respondents see issues related to accommodation as well as financial resources. Some fear that having more private housing arrangements might make it more difficult for the authorities to mitigate the human trafficking risks. The displaced persons from Ukraine are expected to possibly face financial or other kind of obligations vis-à-vis persons that have helped them or provided services or accommodation, which may lead to exploitative offers/situations.

In terms of **training needs**, while the respondents noted that key frontline professionals appear to possess a solid knowledge base, certain sectors require better level of knowledge and awareness of the phenomenon – particularly health professionals, transport and hospitality sector workers. Additionally, there is possibly an increasing need for additional specialisation of professionals providing psycho-social support to be able to address the traumas generated by the war.



The respondents also reported of **proactive preventive steps** taken to ensure better inter-agency coordination to allow for adequate and swift identification of trafficking victims among the refugees from Ukraine. Authorities of one of the respondent countries reported of cooperation with accommodation booking platforms (e.g. Airbnb, Bookio) to enable direct contact with the anti-trafficking authorities in case of suspected human trafficking cases. Moreover, information on human trafficking was published on the website of these platforms. In another country, steps were taken to facilitate the access to labour market by giving the Ukrainian citizens access to the labour market across all specialisation categories and entitling the employers to receive state subsidy for housing and travel expenses. The authorities also commissioned a recruitment agency to give assistance for the refugees in terms of legal and secure employment through designated assistance points.

Adequate policies for accessing legal status and significant reduction of vulnerability to human trafficking

In order to respond to the situation of displacement of millions of people, the European Commission on 4 March 2022 activated the Temporary Protection Directive (TPD). It is an important step as it provides legal **pathways towards safety**. From the viewpoint of one's legal status, TPD foresees the obligation of Member States to provide the persons enjoying temporary protection with **residence permits** for the entire duration of the protection, guarantees for access to the **asylum procedure**, the right to **move to another EU country** before the issuance of a residence permit, and to **move freely in EU countries** (other than the Member State of residence) for 90 days within a 180-day period after a residence permit in the host EU country is issued. TPD's application has led towards swifter issuing of status confirmations and granting effective access to rights, as opposed to facing protracted waiting time for processing one's asylum application.

The TPD's mandatory protection applies to:

- Ukrainian nationals residing in Ukraine and their family members who have been displaced on or after 24 February; and
- stateless persons, and nationals of third countries who benefitted from international protection or equivalent national protection in Ukraine as well as their family members who had been residing in Ukraine before 24 February.

Since many third country nationals who were lawfully residing in Ukraine for other reasons than international protection (such as students) are not included in the scope of application of the TPD, EU Member States shall apply temporary protection or adequate protection under their national law to permanent residents of Ukraine who were in Ukraine prior to 24 February and are unable to return in safe and durable conditions to their countries of origin.

Indeed, the legality of the stay is of paramount importance and an essential factor that contributes to improve the resilience of the people to exploitation, human trafficking and abuse.

Those people who fled the war in Ukraine but remain **outside the temporary protection regime**, fall among the most vulnerable in addition to: women and girls, children (especially separated and unaccompanied children, and children in institutional care), non-Ukrainian nationals (including undocumented and stateless people who were living in Ukraine prior to the war), and groups who were marginalised and discriminated against prior to the war (such as disabled and elderly people, Roma, and LGBTQI+).

As of 17 August 2022, UNHCR reported 6.3 million refugees from Ukraine registered across Europe, while only 3.8 million were registered for Temporary Protection or similar national protection schemes. In many EU Member States, the difference remained within a 10 per cent margin. However, for example, in case of Romania, the number of registered refugees was 84,662 and the number of those registered for Temporary Protection (or similar national protection scheme) was 52,952. In Estonia these figures were 50,491 and 32,077, respectively; In Germany, 940,000 and 670,000, respectively.

The reasons for such a discrepancy are not entirely clear. According to the Police and Border Guard Board of Estonia, such difference can be due to several reasons. For one, impossibility of tracking the complete movement. Namely, following the outbreak of the war in Ukraine, Estonia restored entry checks on the border with Latvia and therefore has registered those leaving Ukraine that arrived either through Russia or Latvia. However, exit controls with Latvia, Finland and Sweden have not been introduced and hence it is possible that many of those that arrived in Estonia and declaring their intent to remain in Estonia, have nevertheless left Estonia. Second, the Police and Border Guard Board estimates that many do not register as they wish to return to Ukraine as soon as possible, while some may also think they do not need any services from the state. Third, a portion of Ukrainian citizens that had arrived to Estonia, had also other grounds to regulate their stay, mainly relocating to live with their family member already residing in Estonia.

In addition, lessons learnt from previous crises underpin also the following risks:

- TPD and the national provisions deriving from it are of a **temporary nature**, which means that they do not allow people to plan for or invest in their future in the long-term. Insecurity about the present and future poses a threat to the people, making them hopeless and vulnerable to various abuse;
- **Non-Ukrainians** who were legally residing in Ukraine with temporary permit have greater difficulties in acceding a legal status. While non-Ukrainian nationals who legally resided in Ukraine do fall under the TPD, recent data from the field suggests that in practice those without Ukrainian nationality seem less entitled to temporary protection. At the outset of the fleeing, other nationals got held up at the border or in other locations facing unclear procedures. These people could easily face irregular status in host countries;
- **Undocumented and stateless people and the Roma** are particularly vulnerable. Those without a proof of legal residence in Ukraine may need to apply for international protection, while there have already been concerns raised about hindrances in the access to protection for the Roma.

A number of countries have **expanded the TPD's protective scope** to other persons in need of international protection due to the war in Ukraine. For instance, according to the data collected by UNHCR, **Germany** extended the temporary protection to Ukrainian nationals who resided in Germany prior to the war and are unable to renew their residency permits because they no longer meet the relevant criteria. **Slovenia, Luxembourg, and Portugal** extended protection also to third-country nationals with short-term residence permits in Ukraine who are unable to return to their countries of origin. Ireland included Ukrainian nationals who were in Ireland before 24 February on short-stay visas, as well as those residing on the basis of other types of migratory permits, who can opt to either extend them or to avail of temporary protection when/if expired. Finland extended the protection to Ukrainian citizens unable to return to Ukraine due to the ongoing conflict as well as their family members, including also those previously residing in Finland, and third-country nationals and stateless persons who resided in Ukraine legally (whose safe and permanent return to the relevant country of origin is not possible). **Spain** expanded the protection to Ukrainian citizens who were residing in Spain and their family members, as well as to those



irregularly in the country before 24 February, as well as third-country nationals who legally resided in Ukraine (who cannot return to their home countries). A number of countries are already showing a **great degree of flexibility** regarding standards for personal documentation for those fleeing the war. For instance, in **Ireland** persons fleeing Ukraine may present any identification documentation available. **Portugal** accepts any means of proof of identity while expired or unofficial documents do not lead to an automatic rejection of the request. In **Bulgaria**, if traditional identification documents are not available, any other official document that indicates identity are considered.

Access to labour market and vulnerabilities to human trafficking of people fleeing the war

The TPD granted the people fleeing the war in Ukraine the right of access to the labour market. However, as discussed above, in some hosting countries there appears to be a rather large discrepancy among those who have fled Ukraine for European countries and those registered for temporary protection.

Not being able to work legally in a host country often means that in order to secure means of subsistence, people seek opportunities in the informal market where any type of unregulated work may be accepted, further exposing already vulnerable displaced persons to exploitative recruiters who may also be traffickers.

The following factors need to be taken into consideration:

- A major obstacle for employment is the **knowledge of the language** of the receiving country, which limits the options of the labour market available to the displaced people, placing them mainly into low-skilled labour sector;
- Practice suggests that the **low-skilled migrant labour** is the segment that experiences the highest numbers of cases of exploitation and abuse. The states should be mindful about it and ensure recognition of professional skills, job matching procedures and access to decent work;
- Some receiving countries and particularly **hosting communities** experience economic challenges. A large group of displaced people can deepen the economic strain and influence negatively the community dynamics.

In addition to the above challenges, the host country also needs to consider the **role of Ukrainian diaspora**. It functions as a bridge between the displaced people and the host country, providing contextual knowledge to the newcomers. Diaspora becomes a source of support during the orientation and job-finding process, a mediator for the first contact with employers. The diaspora could provide the host country with additional insight about the labour engagement of the Ukrainian citizens and about potential problems related to exploitation and abuse.

On 2 June 2022, the **Network of Anti-Trafficking Coordinators of South East Europe** (NATC SEE) in organization by ICMPD in its role as the Network's Secretariat, gathered to discuss the impact of the Ukrainian crisis on human trafficking in the NATC SEE members (Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Kosovo*, Moldova, Montenegro, North Macedonia, Romania, Serbia and Slovenia) and mitigating the trafficking risks amidst the mass displacement from Ukraine in the neighbouring countries. The discussions highlighted two key issues of relevance for this Policy Brief:

- Firstly, no potential or identified victims of trafficking among people fleeing the war in Ukraine were reported in the SEE region;
- Secondly, all the anti-trafficking coordinators did raise concern that **an increased vulnerability** to trafficking is expected to advance in the upcoming period due to **lack of access to the labour market** in the hosting countries.

Displaced children's vulnerability to human trafficking

In the context of crises, children are considered particularly vulnerable because of their age and development. The humanitarian situation, the legal residence and employment status of children's parents or other family members, together with the challenges faced by authorities in relation to, *inter alia*, safe accommodation, child protection and education also influences displaced children's vulnerability. The chaos of displacement poses risks for all children.

The international community has warned about the cases of **missing children**, fleeing the country on their own, sent by their parents to the border or being lost in the groups of people crowding the border-crossing points. Timely registration and identification of vulnerable children, particularly those unaccompanied or separated, is crucial to prevent situations of abuse.

A month after the start of the war, UNICEF alerted that some two million children had fled the Ukraine with (more than) another two million displaced internally. Reliable statistic on the number of **unaccompanied children** are not available yet due to methodological inconsistencies between data collection mechanisms and the initial rapid development of the events that saw large numbers of people flee the war in Ukraine. Numerous reports continue to raise concern, including stories of unaccompanied children being picked up by strangers or a 'friend of a friend'; an absence of procedures to deal with these children when crossing the border of Ukraine, etc. Registering these children, obtaining information about adult family members in Ukraine or in other countries and the involvement of local child protection authorities to make referral to secure child-friendly and age appropriate facilities is a challenge for the first responders. Failing to identify and support these children exposes them to the severe danger of being groomed and abused by traffickers and other criminals. Specific focus is reported given to children from institutions in Ukraine (e.g. orphanages), and children at risk of trafficking and abduction. The European Commission is preparing dedicated Standard Operating Procedures for transfers of unaccompanied minors.

So has nothing been done to address the dangers of human trafficking?

Quite the opposite. The current crisis has triggered a few unprecedented actions, such as the application of TPD, and also a fast response from the international community and EU specifically regarding the risks of human trafficking.

On 28 March the **European Commission** presented a *10-Point Plan* for stronger European coordination on welcoming people fleeing the war against Ukraine, which among others, tasked the EU's Anti-Trafficking Coordinator to develop a shared anti-trafficking plan to address the risks of trafficking and support potential victims. On 11 May, the **EU Anti-Trafficking Coordinator** introduced *A Common Anti-Trafficking Plan to address the risks of trafficking in human beings and support potential victims among those fleeing the war in Ukraine*. The Plan is articulated along five main objectives: strengthening awareness raising, reinforcing prevention, enhancing the law enforcement and judicial response, improving the early identification, support and protection of victims, and addressing the risks of trafficking in human beings in non-EU countries, especially Ukraine and Moldova. Importantly, besides giving recommendations for EU Member States, the Plan sets forth concrete actions with timelines for EC, its structures and agencies.

Europol's agents in frontline countries are supporting law enforcement authorities and border guards in collecting and assessing information to enhance the detection of the human trafficking crime. Europol has set up a Temporary Trafficking in Human Beings Task Management Group with frontline Member States, Ukraine and Moldova, to discuss the most recent information and issues in relation to the war in Ukraine. Europol runs monthly online meetings within the Working Group for Ukraine, which includes representatives of Europol, UNODC, Frontex, and Austria, Germany, Hungary, North Macedonia, Poland, Romania, Ukraine, the Czech Republic and Slovakia to address the human trafficking issues in connection with the war in Ukraine. **Eurojust** has disseminated an



Information Note to all MS to raise awareness of their judicial authorities about human trafficking risks in the context of the war in Ukraine, encourage the authorities to open trafficking investigations when there are suspicions of exploitation of Ukrainian refugees, particularly unaccompanied minors, and to offer its assistance in these trafficking investigations to speed up judicial cooperation. On 14 June 2022, the first informal meeting of the **focus group of specialised prosecutors** against trafficking in human beings gathered prosecutors and judges from the EU MS. Together with the EU Anti-Trafficking Coordinator, the participants discussed how to enhance the judicial response to cases of human trafficking in relation to the war in Ukraine.

Similarly, the European Parliament's different structures have taken active steps, for instance, within the **Intergroup on Children's Rights**, the **Committee on Women's Rights and Gender Equality**, and the **Legal Affairs and Employment Committees**. The **Coordinator on Children's Rights** repeatedly stressed the risks faced by children escaping the conflict and launched common actions with the **European Network of Ombudspersons for Children**. Moreover, MEPs adopted a resolution, expressing their concerns about the increasing number of reports of human trafficking, sexual violence, exploitation, rape, and abuse of women and children fleeing the war in Ukraine.

UN Special Representative of the Secretary-General on Sexual Violence in Conflict conducted an on-site visit to Lviv and Kyiv in May and also visited Poland and Moldova, in light of concerns about the cross-border trafficking of Ukrainian women and children, including for the purposes of sexual exploitation and prostitution. This resulted in the signing of a **Framework of Cooperation on the prevention and response to conflict-related sexual violence** with the Government of Ukraine on 3 May. Among the Framework's five objectives is also addressing concerns related to conflict-driven trafficking in persons for the purposes of sexual exploitation.

The **OSCE** Special Representative and Co-ordinator for Combating Trafficking in Human Beings on 9 March 2022 issued *Recommendations on the need to enhance anti-trafficking prevention amid mass migration flows*. On 4 May, the **Council of Europe** Group of Experts on Action against Trafficking in Human Beings issued a *Guidance Note on addressing the risks of trafficking in human beings related to the war in Ukraine and the ensuing humanitarian crisis*. As mentioned above, the **Network of Anti-Trafficking Coordinators of South East Europe** (NATC SEE) met on 2 June to discuss the impact of the Ukrainian crisis on human trafficking specifically in its members. That initiative is particularly relevant as NATC SEE involves countries that both are and aspire for EU membership, as well as countries that are on the frontlines of humanitarian response to the Ukraine crisis and those who are left out of the spotlight but do still deal with that war's aftermath.

The **Protection Cluster** in Ukraine established in May an Anti-Trafficking Task Force by which it created a platform to, among others, provide technical guidance, identify trends, gaps and priorities, formulate priorities and recommendations for Protection Cluster members, complement the Protection Cluster service mapping to integrate the existing services suitable for survivors to access in this crisis, establish referral and standard operating procedures. The Task Force meets fortnightly.

Finally, as co-chairs of **Interagency Coordination Group against Trafficking in Persons** (ICAT), ICMPD and UNODC have established an ICAT Policy Support Group on trafficking in persons in the context of the Ukraine crisis. Leveraging on the comparative advantages of its members, ICAT will use the Policy Support Group to collect, analyse and exchange relevant information that will be used to inform the development of policy guidance on human trafficking. The Group is meeting monthly, in the week after the Protection Cluster's Task Force meeting.

The brief overview above is merely a glimpse of main actions undertaken by the EU and key international organisations. Meanwhile, there are numbers of non-governmental organisations working daily on addressing the humanitarian crisis. Let us also be mindful that the above initiatives are happening against the background of already elaborate institutional anti-trafficking frameworks on national level of the EU Member States.

THE GENERAL BEARING FOR POLICY OPTIONS

To address the vulnerabilities, the strategies the authorities will develop, would need to:

Reduce the vulnerability of *individuals* as each individual situation is different with its own specific circumstances that create risks to trafficking. Here a survivor-inclusive and survivor-informed approach is important, as are gender- and child-sensitive approaches, supporting vulnerable individuals and groups, and establishing tools and mechanisms to ensure safe online-environment for children;

Work with the relevant *communities* to increase public awareness about the modalities used by the perpetrators and to ensure the community does not unknowingly contribute to the vulnerabilities to human trafficking. It will be valuable to assess, which communities are particularly at risk, also to work with the community-based and civil society organisations to understand the underlying cultural contexts and practices, and to ensure that all the services required for successful reintegration of trafficked persons are available;

Change a number of *structural elements* to create an environment that does not favour human trafficking, including policies and legal frameworks to address the lack of opportunities for all members of the society, to address the challenges in sectors where human trafficking is particularly present, reinforce and build the capacity of stakeholders to identify trafficked persons, investigate and prosecute the offenders (including ensuring the link between national anti-trafficking and asylum systems), and strengthen data collection and analysis on human trafficking phenomenon.

What we know from the recent conflicts

The governments can draw on the valuable lessons gathered and analysed in course of a number of ICMPD research initiatives identifying the vulnerability patterns of people on the move (since the start of the war in Syria). Below we offer some of the key lessons learned from the empirical research to guide the governments on their way to tackle vulnerability and understand what drives the resilience of those on the move.

Personal factors are not in themselves sources of resilience or vulnerability to human trafficking. Rather, these personal factors (e.g. as age and gender) interact with contextual factors (in this particular case, for instance, the armed conflict) of resilience or vulnerability in specific ways to increase resilience or exacerbate vulnerability. Personal vulnerabilities and factors of resilience are relevant throughout the journey, from the pre-departure phase in the country of origin or former residence to settling in the intended final destination.

Children are vulnerable to trafficking and other abuses per se, because of their lack of life experience. Age interacts with gender, making girls, boys, women or men particularly resilient or particularly vulnerable, depending on the context and situation.

Women and girls are at a higher risk of sex trafficking in particular, as well as related abuses such as 'survival sex' (the exchange of sex for a good or service that the person needs) and other forms of sexual and gender-based violence. Men and boys are generally considered more resilient, yet they are also exposed to specific vulnerabilities and gendered expectations. Importantly, in some cases the presumption of their resilience may in fact exacerbate their vulnerabilities.

Travelling in the company of one or both parents, is a key source of resilience for a child. Nevertheless, three crucial issues can be detrimental to the resilience of children travelling with parents. Firstly, children may appear to be travelling with their parents or family members, but in fact this is not the case. Secondly, a child's parent or parents may be the ones who are abusing and/or exploiting them. Finally, children may become separated from their parents along the journey.

Policy approach needs to include approaches on individual, community and systemic/structural levels.



In the context of war in Ukraine, it can be presumed that the majority of unaccompanied children are not orphans, but rather have become separated from their parents or guardians at some stage, either on departure from their country of origin or during the journey.

Children may be sent by their parents to travel alone. While this may cause the child to be vulnerable to exploitation and abuse, because of the risks of the journey, if the children's family subsequently travel and reunite with them, this boosts their resilience as they can once again enjoy parental care.

Women and children are particularly vulnerable to abuse and exploitation, due to gender- and child-specific risks. Women travelling with their children but without an adult male companion – which due to military mobilisation in force in Ukraine most often is the case - are particularly vulnerable. While the majority of those fleeing the war in Ukraine are women and children, it is still important to keep in mind the following lesson learned in case the structure of those fleeing was to change. Women and children may also be at risk from some of the men they are travelling with, and therefore seek protection from other men, including family members. If the men whom they seek protection from protect them, then this is a source of resilience. On the other hand, some women and girls are abused or exploited by men whom they sought out for protection.

Access to education for children and vocational training for adults. Access to education is one of the most important resilience factors to human trafficking for children. For adults, vocational training is a specific factor of resilience, both during the course of the training itself, as a meaningful activity, and as a way of subsequently integrating people into the labour market. Because economic vulnerabilities are one of the key factors making people more prone to trafficking and related abuses, accessing decent employment in a destination country is a crucial factor of resilience.

Lack of options created by restrictions to access to the labour market, and, to a lesser extent, limited opportunities in the labour market for those who do have access, is detrimental to financial and psychological resilience. In some cases, it may lead people to accept exploitative work due to the lack of alternatives.

Effective access to information about their situation and about their options when people arrive in a destination context, in a format they understand, is a crucial aspect of resilience to trafficking and other abuses. People need to know what stage their application for protection is at, how long they will stay at an accommodation centre and what their legal options are, otherwise, due to frustration and uncertainty people may look for alternative, irregular options. An important aspect of access to information is the availability of translation services and cultural mediators to ensure effective communication and build trust between national authorities and people on the move.

RECOMMENDATIONS TO ADDRESS THE VULNERABILITY TO HUMAN TRAFFICKING OF THOSE FLEEING THE WAR IN UKRAINE

Taking into account the vast knowledge base that has formed over the past two decades regarding what constitutes a successful anti-trafficking response, specifically informed by the lessons learned from previous conflicts and guided by the information of the incidence of human trafficking in the context of this ongoing war in Ukraine, the governments of the countries faced with the influx of people that fled the war, need to consider the following set of recommendations as the essential minimum to avoid that human trafficking will become a crisis within a crisis.

- **Ensure continuous dissemination of information** about potential safety risks, exploitation and human trafficking among the authorities responsible for the first contact - the personnel of the reception centres, border and local police structures, officers, NGOs, volunteer's networks and among the arriving persons. Make information available (including in Ukrainian and Russian) about registration, helplines and support services available to refugees.

Lessons learned from previous conflict situations provide solid guidance for actions needed now

- **Ensure that national legislation and regulations are coordinated and prepared to timely register and grant temporary protection to people fleeing the war in Ukraine.** Prepare instructions and road maps/standard operating procedures to facilitate the work of different institutions involved in the process and monitor the capacity of the state administration to process the applications. In cases of excessive workload, ensure additional human, technical and/or financial support. Consider expanding the scope of the temporary protection status to all people fleeing the war in Ukraine. Provide specialist support across the full range of needs of the refugees, including psychosocial and trauma care.
- **Prepare the national anti-trafficking mechanisms** (National Referral Mechanisms or equivalent systems) for identification of trafficking cases among displaced population. Establish early identification mechanisms at borders and/or reception centres (depending on the specific situation in the particular host country). Provide training and capacity development to key first line responders to enable them to identify possible human trafficking cases and support the presumed trafficked persons. Vetting of volunteers and service providers (e.g. drivers) is strongly advised as a good practice.
- **Support the organisations** that provide for the immediate and long-term needs of trafficked people. When opening investigations, provide assistance to the identified victims to ensure their adequate access to justice through legal aid and adequate information in the language they can understand.
- **Ensure access to language and vocational courses** that could be attended in parallel with the employment. Promote women's access to the labour market, particularly in a situation where women are heads of households by introducing training programmes.
- **Engage with the public and the hosting communities to disseminate information** about possible situations of abuse, exploitation and trafficking. Provide hotline numbers and appoint authorities who could be signalled.
- **Work closely with the Ukrainian diaspora** in the receiving country in order to obtain access to vulnerable groups. Monitor situations and signals for potential exploitation and abuse.
- **Assess the situation in the host communities** (especially those with larger displaced population and/or with seriously challenged economies) and include those that are vulnerable in the humanitarian assistance and initiatives directed towards displaced people. Such process will also contribute to improving relations between displaced people and the local residents of the receiving community.
- **Actively identify violations of workers' rights.** The perpetrators should be held responsible by law enforcement agencies, requiring the development and use of indicators, and training programmes for labour inspectors and law enforcement agencies on trafficking for labour exploitation. Labour inspectors should have sufficient resources to carry out inspections of workplaces, particularly in sectors where there are indications of labour exploitation and trafficking.
- **Establish a system for registration of unaccompanied and separated children.** Provide age-appropriate protection and support services: safe child-friendly accommodation facilities (family environment if possible), accurate and fair age-assessment of unaccompanied and separated children, immediate appointment of a legal guardian to represent child's best interest, emotional support adequate to their age, immediate access to education. Implement ongoing monitoring of the cases.
- **Establish and implement cooperation procedures between countries** to identify, trace and reunite unaccompanied, separated or missing children with their family members.
- **Facilitate the children's access to regular schooling** and other child protection measures in order to grant them their basic right to education and render them less likely to become involved in child labour or begging. Children's parents should also be supported in order to have methods or income generation that do not involve their children.



- **Monitor the developments in the human trafficking field in the country.** Particular attention to be placed on monitoring the situation concerning Ukrainian refugees – the incidence of human trafficking identified among them, labour engagements, housing, health care, etc. (for those with special protection status and those without) and the education and care of Ukrainian children, including those residing without parental supervision, also to understand to which extent the Ukrainian diaspora is engaged with the newly arrived people (link-up between the central/provincial/local governments and the Ukrainian diaspora to engage better and monitor the situation).

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