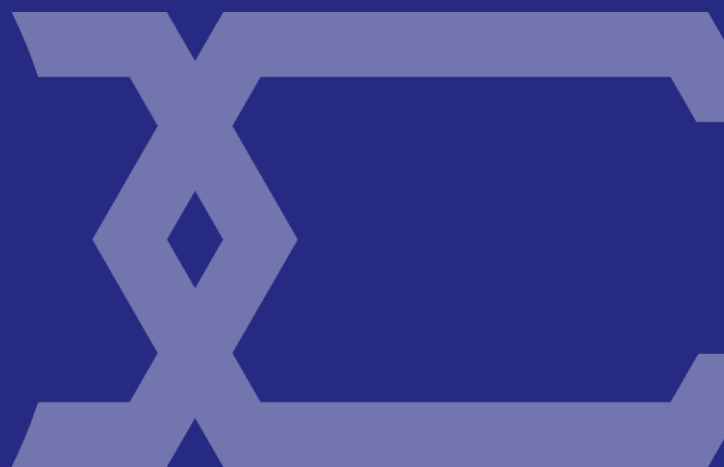




Risks of Human Trafficking for Labour Exploitation among Ukrainian Refugees



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Project Information

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List of abbreviations

| | |
|--------|--|
| D[x.x] | Deliverable |
| FG | Focus Group |
| FRA | European Union Agency for Fundamental Rights |
| HIV | Human Immunodeficiency Virus |
| ICAT | United Nation's Inter-Agency Coordination Group against Trafficking in Persons |
| IOM | International Organization for Migration |
| JRS | Jesuit Refugee Service |
| LEAs | Law Enforcement Agencies |
| NGO | Non-governmental Organisation |
| ODIHR | OSCE Office for Democratic Institutions and Human Rights |
| PTSD | Post-traumatic Stress Disorder |
| STI | Sexually Transmitted Infections |
| TCN | Third Country National |
| THB | Trafficking in Human Beings |
| TPD | Temporary Protection Directive |
| UAM | Unaccompanied Minor |
| UNHCR | United Nations High Commissioner for Refugees |
| UNODC | United Nations Office on Drugs and Crime |
| WP | Work Package |



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| | | 224.1.3 | 234.1.4 | 254.1.5 | 274.1.6 | 284.2 | 304.2.1 | 314.2.2 | 385. | 455.1 | |
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Foreword

This report would not have been possible without the invaluable contributions of our project partners and Ukrainian NGOs who supported Dignita in this process. We extend our gratitude to Asociația pentru Cooperare și Dezvoltare Durabilă (ACDD), the Center for Security Studies (KEMEA), the Hellenic Police, the Hochschule für den öffentlichen Dienst in Bayern, KMOP – Social Action and Innovation Centre, the Ministry of the Interior, Slovenia, the Provincial Police Headquarters in Gdansk, Poland who supported Dignita experts in conducting the online focus group discussions. We are grateful to Foundation “Za Dobroto” and “Ukrainski Dom” in Bulgaria for facilitating the insightful consultative “women’s circles” in Sofia and Varna.

Our gratitude and deep respect go out to the Ukrainian women who shared their experiences and stories from their new homes across Europe. We extend our sincere admiration to the brave women of Ukraine who fled the war, along with children and elderly, and tirelessly navigate the paths to integration in their new host society. Your voices are priceless contribution to this study, and we can only do our best to ensure that this knowledge will help provide protection from violation and exploitation of the Ukrainian refugee communities in Europe.





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1. Introduction

Russia's invasion of Ukraine in 2022 has caused tremendous civilian casualties and destruction of infrastructure, forcing millions to flee their homes in search of safety and security. As of October 2024, 6, 191,800 Ukrainians have been registered in Europe, marking one of the largest refugee crises in European history.¹

Inter-governmental and humanitarian organisations warned at the outset of the war that there is heightened risk of trafficking in persons due to the impacts of conflict: lack of income-generation opportunities; disruption of essential services; and issues with rule of law, internal displacement, and the adoption of negative coping strategies to gain access to food and other supplies, or to ensure their own safety and security.² Heightened risk was also expected, as even before the crisis Ukraine was one of the key source and transit countries for human trafficking in Europe, though Ukrainian victims were also found in the Russian Federation, the Middle East and Southeast Asia.³ The European Commission responded with adopting a specialized "An Anti-Trafficking Plan to protect people fleeing the war in Ukraine."⁴

¹ <https://data.unhcr.org/en/situations/ukraine>, Last accessed 8.11.2024

² UNODC (2022). Conflict in Ukraine: Key Risks of Trafficking in Persons and Smuggling of Migrants. Available at https://www.unodc.org/documents/data-and-analysis/tip/Conflict_Ukraine_TIP_2022.pdf. Last accessed: 8.11.2024

³ UNODC (2022). Conflict in Ukraine: Key Risks of Trafficking in Persons and Smuggling of Migrants. Available at https://www.unodc.org/documents/data-and-analysis/tip/Conflict_Ukraine_TIP_2022.pdf. Last accessed: 8.11.2024; Global Initiative against Transnational Organized Crime (2021c). Ukraine. *GLOBAL ORGANIZED CRIME INDEX*. Available at <https://ocindex.net/2021/country/ukraine>, last accessed: 8.11.2024

⁴ Directorate-General for Migration and Home Affairs (2022). 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: Under the Lead of the EU Anti-trafficking Coordinator. Available at: https://neighbourhood-enlargement.ec.europa.eu/news/trafficking-human-beings-common-plan-address-risks-people-fleeing-war-ukraine-2022-05-11_en Last accessed: 8.11.2024



The activation of the Temporary Protection Directive (TVP)⁵ which provides access to employment, healthcare, education, and social assistance, as well as family reunification and protection against expulsion, along with the swift humanitarian response helped make Ukrainian refugees less vulnerable to human trafficking. The International Organization for Migration (IOM) also notes that the lack of state collapse in Ukraine has also helped to diminish the risks of large-scale proliferation of the crime in times of crisis, as state institutions have remained functional in raising awareness, providing protection to victims, and investigating human trafficking.⁶

While the initial humanitarian response served to mitigate immediate threats to human trafficking, the long-term implications of protracted displacement, linked to economic hardship as savings dwindle and access to employment and social support became more challenging, demand continued attention. Such residual risks to human trafficking are also likely to be higher for specific vulnerable groups.⁷

Against this background, the current report focuses specifically on the risk of labour exploitation among Ukrainian refugees, examining the complex interplay of factors that contribute to their vulnerability within six European Union countries: Bulgaria, Germany, Greece, Poland, Romania, and Slovenia. Germany and Poland currently host the largest number of refugees from Ukraine, Romania and Bulgaria host a substantial number of refugees, while Greece and Slovenia have smaller numbers of displaced persons. The diverse contexts, including bordering countries (Poland and Romania), countries with large diasporas and cultural ties (Poland, Bulgaria), as well as new/non-traditional destination

⁵ The Council Of The European Union (2001). Council Directive 2001/55/EC: On Minimum Standards For Giving Temporary Protection in the Event Of A Mass Influx Of Displaced Persons, And On Measures Promoting A Balance Of Efforts Between Member States In Receiving Such Persons And Bearing The Consequences Thereof. Document 32001L0055. Available At <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32001L0055&oid=1648223587338>. Last accessed: 8.11.2024

⁶ IOM, (2023). Human Trafficking in the Ukraine Crisis. Regional Task Force March 2023. Available at: https://www.iom.int/sites/g/files/tmzbdl486/files/documents/2023-07/human_trafficking_in_the_ukraine_crisis-final2.pdf. Last accessed: 8.11.2024

⁷ Ibid. Last accessed: 8.11.2024

countries for Ukrainian migrants (Greece, Slovenia) provide an opportunity to assess how common vulnerabilities may manifest in various contexts, but also to analyse differences in policies and practices and their impact on displaced persons.

| Country | Ukrainian refugees recorded in the country | Ukrainian refugees who applied for TP Asylum or similar national protection |
|----------|--|---|
| Germany | 1,212,835 | 1,137,445 |
| Poland | 981,335 | 1,866,605 |
| Romania | 162,180 | 183,960 |
| Bulgaria | 67,540 | 198,575 |
| Greece | 32,315 | 31,620 |
| Slovenia | 12,515 | 12,080 |

Table 1. Number of Ukrainian refugees in the six countries. Source: United Nations High Commissioner for Refugees (UNHCR)



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2. Method

The research presented here employs a mixed-methods approach, relying on qualitative data collection and an interpretive paradigm to analyse the findings. An initial desk research of academic and non-academic literature and relevant reports of intergovernmental and international organisations served to formulate hypothesis and design the focus group discussions for the two groups: humanitarian workers and NGOs, and Ukrainian refugees. The findings of focus group discussions were then combined with additional desk research to identify relevant quantitative surveys or administrative data which would confirm or challenge the findings.

2.1 Data Collection

In the period 14- 16 May 2024 Dignita Foundation conducted three online focus groups with service providers and humanitarian organisations from the participating six countries in the project (Germany, Bulgaria, Slovenia, Greece, Romania, and Poland). The aim of the focus groups was to assess any vulnerabilities and risks to trafficking in human beings among the Ukrainian refugees and to search for resilience factors and positive practices.

The focus groups were conducted in three consecutive days during May, 2024. The participating countries were divided into three groups depending on the number of displaced Ukrainian refugees as follows:

- (1) 14th May 2024 – Germany (4 participants) and Poland (5 participants);
- (2) 15th May 2024 – Bulgaria (2 participants) and Romania (5 participants);
- (3) 16th May 2024 – Slovenia (4 participants) and Greece (2 participants).

The focus group discussions were structured in four sessions. For each session there were specific questions posed to the participants aiming to guide the discussion.



In addition, four focus group discussions in the format of “women’s circles” were conducted with 47 Ukrainian refugees in Bulgaria to gather first-hand lived experience on the integration challenges and vulnerabilities of Ukrainian refugees to trafficking for labour exploitation. The “women’s circles” were developed by Dignita to gather Ukrainian refugees in informal setting to raise awareness on the risk of trafficking in human beings and to provide knowledge on their labour rights and opportunities to join the formal labour market. In this project, “women’s circles” were organised with a consultative, data collection function, and the women were asked to share their experience with the labour market and general integration in the host society. The discussion was moderated and followed a loose focus-group type scenario.

The first two rounds of “women`s circles” took place in Sofia and were held in two consecutive days, on 17 and 18 June 2024. The circles were attended by 27 adult female refugees from Ukraine (15 participants on 17 June and 12 on 18 June 2024).

Most of the participants in the first circles had been in Bulgaria for more than one or two years. Only three women stated that they had arrived less than one year ago. The age distribution of the participants was as follows:

- 3 participants were in the 15-24 age group;
- 14 participants were in the 25-49 age group;
- 7 participants were in the 50-64 age group;
- 3 participants were aged 65 and older.

The second round of women’s circles took place in Varna, a large city at the Black Sea, hosting one of the largest communities of Ukrainian refugees in Bulgaria. The third and fourth women’s circles took place on 17-18 July 2024 in the premises of the NGO “Ukrainski dom” (Ukrainian House). A total of 17 female refugees from Ukraine participated in the

discussions (ten participants on 17 July and 7 on 18 July 2024). The first session involved women who had already been living in Bulgaria for 1-2 years, most of them are participants in the humanitarian aid program for Ukrainian refugees, while the second session was held with new arrivals. The majority of the participants were between 20 and 45 years of age.

The sessions lasted about one- and-a-half to two hours. The sessions were conducted in Russian and then transcribed with an online tool (TurboScribe Unlimited) and afterwards translated into Bulgarian.

The discussions followed a structure of four themes: integration challenges, experience in accessing labour market, knowledge of rights and institutions. Women were asked to speak freely about their experiences and could avoid topics that they were not comfortable to discuss. The participants included newly arrived refugees (in a separate group) and those who had reached Bulgaria shortly after the invasion began. The two locations are those with highest concentration of refugees in Bulgaria, and the diversity in locations allows for an analysis of specific risk sectors, such as tourism, as well as practice (state accommodation) and their effect on vulnerabilities. The data collected was used to add the voice of refugees in the different topics of this study.

2.2 Objectives of the Report

Overall, this triangulation approach allows for a nuanced understanding of both, the systemic issues contributing to vulnerability and the lived experiences of those affected.

The resulting present report explores several key themes:

- **Migration Patterns:** The study examines the complex and often changing migration patterns of Ukrainian refugees and traces the initial choice of destination which is influenced by factors such as proximity to Ukraine, family ties, and available support networks. Subsequent movements within and between countries are mentioned,

revealing the influence of factors such as the extent of governmental aid, educational opportunities, and language barriers.

- **Vulnerable Groups:** The research aims to identify specific groups that are particularly at risk of becoming victims of labour exploitation. These at-risk groups are assumed to have inherent personal factors that increase their vulnerability to human trafficking.
- **Contextual and Situational Factors:** The report seeks to explore the key contextual and structural factors that increase the vulnerability to human trafficking. Data from focus group discussions is cross-referenced with recent surveys to analyse the most relevant and persistent factors that increase the risk of trafficking for labour exploitation nearly three years after the refugee crisis.
- **Labour of Exploitation:** The report will look at the forms and prevalence of labour exploitation at both ends of the spectrum: from administrative offences and labour law violations to possible scenarios of forced labour and trafficking for labour exploitation.
- **Resilience and Protective Factors:** Finally, the study aims to examine resilience factors and positive practices in the countries that mitigate the risks of labour exploitation.

By integrating quantitative data gathered through desk research with qualitative insights from both service providers and refugees themselves, this report seeks to offer a comprehensive picture of the challenges faced by Ukrainian refugees and to provide a robust foundation for evidence-based policy recommendations.

2.3 Definitions

This study uses the definition of trafficking in human beings as provided in the Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing

and combating trafficking in human beings and protecting its victims, and replacing Council Framework Decision 2002/629/JHA:

The recruitment, transportation, transfer, harbouring or reception of persons, including the exchange or transfer of control over those 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...

Exploitation shall include, as a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, including begging, slavery or practices similar to slavery, servitude, or the exploitation of criminal activities, or the removal of organs. ⁸

Forced labour is defined as "all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily."⁹

While there is no universal definition of **labour exploitation**, the report refers to the explanation provided by the Council of Europe Recommendation CM/Rec(2022)21 (2023) on Preventing and combating trafficking in human beings for the purpose of labour exploitation:

⁸ Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on Preventing and Combating Trafficking in Human Beings and Protecting its Victims, and Replacing Council Framework Decision 2002/629/JHA. Available At [https://eur-lex.europa.eu/legal-content/en/txt/html/?uri=CELEX%3A32011L0036#:~:Text=Whereas%3A-\(1\),Rights%20of%20the%20European%20Union](https://eur-lex.europa.eu/legal-content/en/txt/html/?uri=CELEX%3A32011L0036#:~:Text=Whereas%3A-(1),Rights%20of%20the%20European%20Union). Last Accessed: 8.11.2024

⁹ ILO Forced Labour Convention, 1930 (No. 29), Article 2 (1). Available at: [file:///D:/Documents%20from%20internet/wcms_346435%20\(2\).pdf](file:///D:/Documents%20from%20internet/wcms_346435%20(2).pdf)

In general, labour exploitation is understood as the taking of unfair advantage of another person’s vulnerability or state of need, and coercion, consisting of a combination of labour law and criminal law violations and/or other abuses.¹⁰

The report uses interchangeably the terms of “trafficking for labour exploitation” and “trafficking for forced labour”.

Labour exploitation is best understood as a continuum from decent work to severe exploitation as the two extremes, with a number of practices ‘in between’ .^{11,12} Other continuums of **coercive to voluntary employment**, and **illegal to legal employment** are perceived to interact with this continuum of exploitation.¹³

¹⁰ Council Of Europe – Committee Of Ministers (2023). Preventing and Combating Trafficking in Human Beings For The Purpose Of Labour Exploitation - Recommendation CM/Rec(2022)21. Available at: <https://edoc.coe.int/en/trafficking-in-human-beings/11413-preventing-and-combating-trafficking-in-human-beings-for-the-purpose-of-labour-exploitation-recommendation-cmrec202221.html>

¹¹ Skrivankova, K. (2010). Between Decent Work and Forced Labour: Examining the Continuum of Exploitation. York: Joseph Rowntree Foundation.

¹² France, B. (2016). Labour Compliance to Exploitation and The Abuses In-Between. London: Labour Exploitation Advisory Group (FLEX).

¹³ Davies, J. (2018) From Severe to Routine Labour Exploitation: The Case of Migrant Workers in the UK Food Industry. *Criminology & Criminal Justice*, 19(3), 1–17.

3. Migration patterns of Ukrainian refugees in the six countries

After Russia’s invasion of Ukraine, most Ukrainian refugees initially fled to neighbouring countries, including Poland, Hungary, Romania, and Slovakia. Poland received the largest number of refugees, with over 1.5 million Ukrainians crossing its border in the initial weeks of the conflict. Subsequent migration within EU followed in the ensuing months, while according to the UNHCR, onward movements outside of Europe have increased significantly in 2023, with over 403,600 refugees from Ukraine recorded outside of Europe by December 2023, compared to 230,000 by end of 2022. The majority of these refugees are hosted in Canada and the United States of America which have set-up specific schemes for temporary stay.¹⁴

The UNHCR also provides a detailed analysis on the reasons and frequency of visits of refugees back to Ukraine, with an intentions survey indicating an increasing trend in short-term visits over time, with up to 39% of refugees (around 1.8 million refugees) reporting that they had visited Ukraine at least once since their displacement. Similarly, border monitoring interviews show that the incidence of repeated movements has also grown over time. The most frequent reasons reported by refugees for travelling back to Ukraine are to visit relatives or friends, followed by access to healthcare and to obtain documentation. Short-term visits are more frequent among refugees hosted in neighbouring countries.¹⁵

The current research does not intend to present a representative data on the migration intentions and reasons for movement of the Ukrainian refugees from the six countries within or outside of the EU. In fact, it does not add any quantitative data to the plethora of surveys

¹⁴ UNHCR (2024). Ukraine Refugee Situation Population Movements | Factsheet #1. Available at <https://data.unhcr.org/en/documents/details/106707>. Last accessed: 8.11.2024

¹⁵ Ibid

provided by the UNHCR and IOM. As migration trends are not a dominant topic explored by the research, the current input provided by focus group respondents can serve to provide insights into the different push and pull factors for migration within the EU and for short returns back to Ukraine.

3.1 Initial Destination Choices and Subsequent Movement

The initial choice of destination country was often influenced by proximity to Ukraine and existing family/community ties. Romania and Bulgaria were initially popular due to their geographical proximity:

We saw that Romania was targeted mainly by Ukrainians who wanted to be as close as possible to their home country in order to go back as soon as possible. So, for this reason we had an issue in Romania related to integration that was not first seen as a solution for many Ukrainians and also circular movements as it was mentioned before. People went back to Ukraine and then back and forth. But with regard to Bulgaria, we had many people who preferred to go to Bulgaria instead of staying in Romania because of the language, because of communication. And the other thing is that some minorities were preferring to go to Bulgaria because they had better connections in Bulgaria.¹⁶

Subsequent movements were frequent, driven by various factors including access to financial support, while changes in the level of governmental aid prompted shifts between EU countries. In addition, educational opportunities were decisive for further movements of the refugees:

¹⁶ FG (2) S. L., expert from NGO, Romania

The moment when Bulgaria decided to decrease the level of assistance, people moved from Bulgaria to other countries. And we also had another pull factor related to education. Romania was one of the few countries in Europe that could provide education in Ukrainian. We had educational hubs established in Romania where they could continue to learn in Ukrainian with education provided by Ukrainian teachers, although not recognized by either Romanian state or by Ukrainian authorities because Romania and Ukraine had no bilateral agreement of mutual recognition of diplomacy and studies. Still, they prefer to have access to this kind of education. So, we had cases, reported cases of parents and children that initially went to Bulgaria or Turkey and then they went back to Romania.¹⁷

In addition, difficulties in finding employment due to language barriers in some countries led to onward movement. Slovenia was highlighted as an example:

They are facing language barriers, because Slovenian language is specific, for number of reasons, specifically because we are the only ones speaking it. But the language barriers are not working in line with their education, which also compounded with complications with other administrative issues.¹⁸

In addition to countries within EU, with Germany being the preferred choice of Ukrainian refugees who undertook subsequent migration, other non- EU destination countries noted by participants included Canada and Australia.

3.2 Circular Migration and Return to Ukraine

¹⁷ FG (2) S. L., expert from NGO, Romania

¹⁸ FG (3) M. M., expert from Humanitarian organisation, Slovenia

In all six countries, a significant portion of refugees engaged in circular migration, returning to Ukraine for visits or extended periods, often due to family ties:

Some refugees returned to Ukraine, but it's more than they go home and come back. It's more like they are visiting the mothers and grandfathers in the Ukraine, or husbands, and then they come back. So usually, they go home for the holidays, the school holidays, and they come back afterwards.¹⁹

According to some FG participants, this type of migration creates challenges for integration and long-term planning, particularly regarding access to social support:

We observe that one group wants to go to Germany and maybe to another country. And now we have in 2023 and 2024, we have a lot of questions from Ukrainian refugees about migration to Germany and about legal work there, legal stay. But another group is returning to Ukraine or living between two countries. And in our opinion, it will be a big challenge for integration for next year and maybe in the next five years or ten. How to integrate people who are living in Poland and in Ukrainian in between?²⁰

In Poland, if the refugees are absent from the country for more than 30 days, they would lose their temporary protection status and access to social services upon return. In other countries, such as Slovenia, participants noted that the authorities have been lenient and flexible with Ukrainians who travelled back home and returned to the host country:

So far from what I've noticed there is people haven't been really facing major difficulties if they wish to go for a shorter period for a visit of sorts. There was no issue because

¹⁹ FG (1) M. M., expert from NGO, Germany

²⁰ FG (1) K. I., NGO expert, Poland

although there was a technical requirement for people to renounce their TP if they come back to Ukraine there is very little in terms of practical ways of enforcing it. The only issues that I really heard were from people living in collective centres, especially at the beginning when they would leave for a longer period of time or without kind of giving a heads up that they're leaving. And then their room would be given to somebody else and they would come back afterwards not satisfied that they lost their space. But now the situation is mostly resolved where people kind of give an advance to warning, it will be gone for three weeks or something and then their room is kept if it's a shorter period of time. But I haven't really heard of cases where TP was taken away from a TP holder because they were away for too long.²¹

The discussion also highlighted the difficulties which refugees face when integrating in their host countries, including language barriers, job market restrictions, or limited state support, which act as push factors to pursue onward migration. These factors are dealt with in more detail in the next chapter. The FG discussion revealed a dynamic and multifaceted migration landscape. Understanding these evolving patterns is crucial for tailoring effective humanitarian assistance and integration strategies for Ukrainian refugees. The interplay of geographical proximity, financial support, educational opportunities, and the uncertain security situation in Ukraine contributes to the complex circumstances that can be observed in their movement.

²¹ FG (3) O. B., expert from Humanitarian organisation, Slovenia

4. **Vulnerability to human trafficking for labour exploitation**

The United Nation’s Inter-Agency Coordination Group against Trafficking in Persons (ICAT) model describes vulnerability as “encompassing different factors: personal, situational and contextual, which interact and may increase the risk of trafficking for certain individuals, groups and/or communities”.²² Thus, the concept of vulnerability can be understood to mean that some people are more susceptible to harm, compared to others, as a result of exposure to some form of risk.²³

The harm can be physical, psychological, or environmental, and the risks vary depending on the type of harm suffered. Vulnerability isn't solely determined by individual characteristics (like age, gender, or ethnicity) but arises from the complex interaction of personal traits (personal factors), temporary circumstances (situational factors), and broader societal factors (contextual factors). A personal characteristic only becomes a vulnerability when it is combined with other factors that increase the risk of harm. Situational vulnerabilities are temporary challenges, unlike more permanent personal traits, which negatively affect the situation of a person in a specific period and in a specific context. Contextual vulnerabilities result from external factors like discriminatory policies (e.g., denying work permits) or societal norms that fuel prejudice against specific groups. All these factors interact to make certain individuals, groups, or communities more susceptible to harm, including trafficking.²⁴ Each category is observed in more detail in the following chapter, whereas the present

²² IOM, (2023). Human Trafficking in the Ukraine Crisis. Regional Task Force March 2023. Available at: https://www.iom.int/sites/g/files/tmzbd1486/files/documents/2023-07/human_trafficking_in_the_ukraine_crisis-final2.pdf. Last accessed: 8.11.2024

²³ Ibid

²⁴ Ibid

research aims to establish the specific personal, contextual, and situational factors that increase the vulnerability of the Ukrainian refugees to trafficking for labour exploitation.

4.1 Personal Factors

Previous studies, including reports on vulnerabilities of displaced persons due to conflicts, and reports on the Ukraine crisis in particular, discuss the personal factors that increase the risk of trafficking. Among the risk groups mentioned are women and children, especially unaccompanied minors (UAMs), persons with disabilities, LGBTQ+ and ethnic minorities, elderly people and internally displaced persons.²⁵ Two years after Russia's invasion in Ukraine and the activation of the Temporary Protection Directive (TPD), the FG discussions provided evidence that the above mentioned risk groups vulnerable to exploitation were still those, whereas in some cases personal traits were mixed with situational factors to add newly emerging vulnerable groups. One such group that became visible within the six countries studied were single mothers with large families.

4.1.1 *Single mothers with large families*

While women are in general more vulnerable to abuse and exploitation in times of conflict, **single mothers with large families fleeing the war in Ukraine have been shown to be especially at risk.** This vulnerability of this group is exacerbated by the significant financial pressures of caring for children and, in some cases the elderly, and limited access to support.

They are willing to do whatever is needed in order to survive, mainly in the last two months, since the government support has been excluded or limited. Many of them have no possibility to cover their accommodation costs. And because they are not able to cover the accommodation costs, they have no possibility to go back to Ukraine, even because

²⁵ UNODC (2022). Conflict in Ukraine: Key Evidence of Risks of Trafficking in Persons and Smuggling of Migrants. Available at https://reliefweb.int/attachments/60f81874-c8bb-3b80-a569-42735f803b9d/Conflict_Ukraine_TIP_2022.pdf.

they are coming from occupied territories or conflict region. Or there is, as you already mentioned, stigma for those that have travelled abroad (to flee the war).²⁶

It became clear during the focus group discussions that single women with a large number of children are vulnerable to both labour and sexual exploitation.

They (single moms with a large number of children) are accepting any kind of offer. Some of them are exploited through labour exploitation. We have been in contact with Ukrainians that are in this situation. They do not have a labour contract because the employer does not want to offer them. And they work for a lot of hours, for a very low salary.²⁷

The labour exploitation practices are illustrated in more detail in the chapter 5. Participants also mentioned that single-headed households of women with many dependents lead them to pursue desperate strategies for income such as video-chats.

And another risk that we have seen is video-chat. And also, from video-chat arises risk of sexual exploitation. We have met some women that told us that they have no other option in Romania, and they have accepted to work in video-chat. However, video-chat is very risky for them. We also seen job offers abroad. Most of the job offers are in countries in which prostitution is legalized, like Sweden, Germany, UK, and Italy. These are the countries in which we also see a movement of single women and women in risk of exploitation having good promises of jobs. And that sometimes, based on our evaluation, are not fair jobs or real jobs.²⁸

²⁶ FG (2) S. T., NGO expert, Romania

²⁷ Ibid

²⁸ Ibid

In addition, some single refugee women who were in dire financial straits took risky options to become surrogate mothers, without being aware of the actual arrangements, the transportation route or the procedure itself.²⁹ Such desperate strategies to find subsistence are likely to worsen as women's financial resources are gradually depleting, almost three years since the start of the war.

4.1.2 Roma women

Another subgroup among the Ukrainian women that is especially vulnerable to abuse and exploitation are **Roma women**. The challenges faced by Roma women were consistently raised by FG respondents:

Another vulnerable group that we were very concerned about is the **Romani women**. They faced multiple challenges in accessing all sorts of services. Because we had contact in this area, we know particularly about the healthcare system, but we know from them that there are challenges at any point. They are being refused access to services. They are facing discrimination at multiple points. We had situations where they were refused to be picked up by drivers when we were trying to facilitate transport for them. And also, many of these women are illiterate. Informing them and providing them the resources necessary is a challenge. So, we had to adapt in terms of how we communicate with this group.³⁰

Other participants also mentioned challenges in accessing accommodation for Romani refugees, even in cases where NGOs offered support and acted as intermediaries:

Finding accommodation for them was nearly impossible. At some point emergency accommodation, even from NGOs, I would say that we don't ask for a present here. But

²⁹ FG (2) B. B., expert from NGO, Romania

³⁰ FG (2) B. B., expert from NGO, Romania

when we try to find accommodation (for the refugees) from NGOs, there is the question about their ethnicity. I was shocked in some situations, but that was the reality. I cannot deny it. So, the situation for them was to accommodate them in the church, in the monastery, because nobody else wanted to immediately accommodate them.³¹

In Romania, this situation was further exacerbated for some members of the Roma minority who entered the country with minimum documentation. When the conditions for entry were relaxed, border authorities accepted refugees with a minimum of personal documents and even copies of IDs were sufficient as proof of Ukrainian citizenship. However, when the refugees tried to seek consular service and obtain IDs, passports or other documents like birth certificate, the Ukrainian authorities informed them that they cannot receive such assistance due to the conflict in the country.³²

Participants from Germany also shared difficulties with the integration of Ukrainian Roma refugees who are still placed in mass refugee accommodation facilities. In these facilities, women did not receive language courses, as they also had to take care of multiple children, and they did not have access to childcare services. These situational factors are further described in the next sections. What becomes apparent, though, is that systematic discrimination against the Roma, leading to limited access to services, contributes to further marginalisation and increases the risk of trafficking.³³

4.1.3 *Unaccompanied Minors and Separated Children*

Previous studies reveal a heightened vulnerability of UAMs among displaced populations to exploitation and abuse. At the onset of the Ukraine crisis, the European Commission, along

³¹ FG (2) P. E. B., expert from Refugee NGO, Romania

³² FG (2) P. E. B., expert from Refugee NGO, Romania

³³ FG (1) M. M. expert from NGO, Germany

with intergovernmental organisations,³⁴ warned against the high risk of trafficking for Ukrainian UAMs. The current study established that risks of human trafficking and exploitation persist, with emerging new patterns of risk migration. FG participants shared that Ukrainian UAMs leave Romania and travel to Turkey by plane, where they are seemingly not monitored, or placed in childcare institutions:

One of the vulnerable groups that we've seen are single and unaccompanied, or separated children. And what we've seen at the Romanian border as a strange situation is related to Ukrainian children that are traveling to Turkey. We know from the Syrian conflict that children in Turkey have been exploited in all forms of trafficking. So, it's very difficult for me to understand why many children have been sent by the Romanian government to Turkey. They haven't been monitored... For example, if an unaccompanied child or a separated child is traveling to Turkey and has a flight ticket from Romania, that child is allowed to go to Turkey. It's not institutionalized (placed in childcare institutions). But if the same child that wants to go to Germany or Bulgaria or any other country, that child will be institutionalized. In fact, it seems that at the border, for specific cases, many children are allowed to go further to Turkey. And for me, it's a big question mark. It seems that about 3,000 children have been sent to Turkey to Antalya. Antalya is known as being one of the regions that has the highest level of sexual exploitation of children.³⁵

This migration pattern deserves due attention in order to identify the reasons for migration, the specific migration routes and the levels of protection of UAMs in Turkey, as well as possible exploitation schemes. Such an investigation is beyond the scope of the current study. This scenario, however, illustrates the gaps in the monitoring and registration systems

³⁴ UNODC (2022). Conflict in Ukraine: Key Evidence of Risks of Trafficking in Persons and Smuggling of Migrants. Available at https://reliefweb.int/attachments/60f81874-c8bb-3b80-a569-42735f803b9d/Conflict_Ukraine_TIP_2022.pdf.

³⁵ FG (2) S. T., NGO expert, Romania

that increase the possibilities for the violation of children’s rights. These gaps were further illustrated by another FG participant in Romania:

The registration of the borders initially was not done in a proper way so children could only cross the borders without being registered. And the moment when the authorities started to do the registration, they had a mechanism, but this mechanism is not properly established. Now, I will try to give an example. They had the obligation to put in a database register all children. And this should be done by the child protection authorities throughout the country, so it's something that should work in the normal flow. However, we have more children registered by the school inspectorates, so for the education purposes, than children registered in this database, which is not normal. So, this is an issue that needs further consideration.³⁶

4.1.4 *Elderly People*

Elderly people often face significant barriers accessing essential services, including healthcare, employment, and social support. Most often, they fall outside of the scope of social support programs and their limited income, economic dependence and limited social networks can make them particularly vulnerable to exploitation and abuse. These vulnerabilities were underscored by focus group participants from all six countries:

Among the vulnerable groups, we see this group of elderly people. They fall outside of most of the intervention provided by the state and by the NGOs. They are ill and with no income, relying only on their retirement payments from Ukraine and also on some cash assistance from NGOs. This group is quite big. Most of these persons are located in south part of the seaside around Burgas [Black Sea coast town in Bulgaria] in state accommodation facilities, but no one knows for how long this will continue. No one knows

³⁶ FG (2) S. L. expert from a Catholic NGO, Romania

and has planned what should happen with these people after that (the end of the programme).³⁷

Elderly people are isolated both spaciously and socially and their limited contacts with the host society and limited knowledge of internet technologies make them vulnerable to different types of crimes and scams.

There's one group we have in Germany, there's an older Ukrainian people, but you don't notice them because they are not so relevant for ... it's not so nice to say, but they're not so relevant for the labour market because they are too old for working. And so, the systems for refugees often have the goal to make the people fit for the labour market to integrate them in a country. And the older people are not the target group of most programs we have in Germany and so you don't see them, they are sitting at home.

I think older people are, for sure, are (vulnerable to human rights violations), because they don't know, for example, modern technologies, but not only for refugees, also older people in Germany are victims of crime, for example, they are tricked by criminals. And when you are older and you're not in our country, you don't know the culture, you don't know the language, you're much more vulnerable without family.³⁸

FG discussions with Ukrainian refugees in Bulgaria revealed the precarious situation of elderly people. While they are offered accommodation in state facilities, they live on their limited pension from Ukraine, which is insufficient to cover their needs, and often they do not have the support network of their families. They are not in a good position to join the labour market, due to preference of younger workers. Situation is especially dire for those with chronic diseases.

³⁷ FG (2) G. B., expert from IGO, Bulgaria.

³⁸ FG (1) M. M. expert from NGO, Germany

We live on a 120 Euro pension, my husband and I. My husband is a cancer patient and he has had three operations, he is disabled. We rely on support for medication from Ukrainski dom [Ukrainian NGO]. I tried looking for work, but they ask me how old I am. And when they find that I am in pension age, they do not offer jobs.³⁹

4.1.5 *People with Disabilities*

Along with elderly refugees, people with disabilities have inherent vulnerabilities pertaining to their limited mobility, access to resources, and overall dependence on others for basic needs. FG participants shared concern with regards to the limited government support to persons with either physical and/or mental disabilities.

That was one of the points that I wanted to raise concerning persons with disabilities who are still facing problems. And at least for Romania, the issue is raised also in the context of non-insurance of proper accommodation to these people (in accordance with their needs). They are hosted by governmental shelters or by different institutions throughout Romania. And we know that the government is not willing to address the problem... So basically, they are the ones who can be left out due to the lack of money. And the authorities are unable to provide other core support to these people. It was difficult for them even to go back to Ukraine these two years.⁴⁰

In other situations, quoted by FG participants, persons with disabilities had left the host community to return to Ukraine due to a lack of adequate support:

This is quite a challenge here in Slovenia because these persons (with physical and mental disabilities) coming from Ukraine do not have access to this basket of support and

³⁹ Women circle Varna on 17.07.2024, Oksana

⁴⁰ FG (2) S. L., expert from a Catholic NGO, Romania

services that the domestic population has, as they have not paid in advance for the social security insurance. So, there is quite limited offer of support for persons with such disabilities. And we also had a group of persons (with disabilities), which did not stay for a long period of time in Slovenia, I think they even returned back to Ukraine.⁴¹

Contextual factors, such as the difficult bureaucratic procedures in proving a disability status in the host countries further exacerbate the vulnerability of this group of Ukrainian refugees to human trafficking.⁴²

4.1.6 *Men Fleeing Mobilisation*

A newly emerging vulnerable group to trafficking in human beings are Ukrainian men fleeing across the border to avoid military conscription. While their vulnerability is not personal, but rather contextual, as pertaining to their legal status at home and their lack of personal documents, they merit special attention as their situation and vulnerabilities have not been subject to any previous research to date.

FG participants from Romania shared concern that Ukrainian men, fleeing conscription, most often use the services of smugglers and possibly even traffickers to leave Ukraine and to enter the host country:

What is worrying for us is the ones who are illegally crossing the border and they are risking their lives, especially men. From the 18th of May, the new mobilization laws in Ukraine will be coming forth and we see the trend now that a lot of men, single men from Ukraine are passing the Tisza River in the north part of the country and also in the

⁴¹ FG (3) M. M., expert from Humanitarian organisation, Slovenia

⁴² Sharapov, K., Komenda, H. & Gheorghiu, M. (2024). Vulnerability to Trafficking in Persons in the Context of the War in Ukraine. Findings from Poland and Romania. Available at https://reliefweb.int/attachments/0f72f244-df6b-4bb1-aa64-426292ca5567/Vulnerability%20to%20TIP_war%20in%20Ukraine_Poland%20and%20Romania_August%2024.pdf, p. 32 ,

mountains, in the forest, risking their lives to come. Three, four months ago, we had groups of persons illegally crossing the border to avoid mobilization. We had smaller groups passing through the Marmorosh mountains, which are very hard mountains to pass. Now we see bigger groups, 30, 35, 40 persons coming all at once. Some of them are being of course led by the trafficking networks.⁴³

While this is a new phenomenon, which merits further research and analysis, a new report by the IOM also provides evidence of Ukrainian men crossing the river Bug to arrive in Poland to avoid conscription.

Ukrainian men swim across the river, and very often at the railway station you see them in diving suits. They put something on top, but you can still see these diving tights. They ask for food; they ask to be fed.⁴⁴

The risks of trafficking for these men do not end with the border crossing. As they leave the country without their personal documents to avoid detection and military conscription, they arrive in the host countries without passports or personal IDs. The recent suspension of consular services for Ukrainian military-age men without a military record by the Government of Ukraine thus creates additional barriers to accessing temporary protection, especially in situations where valid travel documents may be required for temporary protection registration. The consular services in Romania do not offer any services to men fleeing Ukraine who are subject to conscription, and they refuse to provide assistance in relation to obtaining personal documents such as birth certificates, IDs, and passports. Such measures

⁴³ FG (2) P. E.-B., expert from NGO, Romania

⁴⁴ Sharapov, K., Komenda, H. & Gheorghiu, M. (2024). Vulnerability to Trafficking in Persons in the Context of the War in Ukraine. Findings from Poland and Romania. Available at https://reliefweb.int/attachments/0f72f244-df6b-4bb1-aa64-426292ca5567/Vulnerability%20to%20TIP_war%20in%20Ukraine_Poland%20and%20Romania_August%2024.pdf, p. 34.

(requirement of a valid travel document for confirmation of identity) are currently being considered in Poland as part of the Draft Law amending the Act on Assistance to Citizens of Ukraine in the Context of Armed Conflict in Ukraine.

Thus, in essence, the men remain in the host countries undocumented and they do not have access to support, or possibility to access the labour market. They also do not have possibility to return to Ukraine without facing charges. Thus, their only way to sustain themselves financially is through involvement in the grey or black economies. They may become a target for traffickers and are thus at high risk of trafficking for labour exploitation.

4.2 Situational and contextual factors

Personal factors are often joined together with additional situational and contextual factors, which significantly exacerbates the vulnerability of Ukrainian refugees to human trafficking. Situational factors describe circumstances increasing vulnerability to exploitation and trafficking, regardless of inherent characteristics of the person or group. Contextual factors encompass the broader societal and political environments influencing vulnerability.

Previous studies have provided a list of situational and contextual factors that have aggravated the vulnerability of Ukrainian refugees to human trafficking.⁴⁵ Almost three years since the first arrivals of Ukrainian refugees in the EU member states, most of these factors unfortunately still remain, while the current research established new, additional risks determinants to trafficking and exploitation.

⁴⁵Dumont, J.-C., Lauren, A. (2023). Joining Forces for Gender Equality : The labour market integration challenges of Ukrainian refugee women. Available at <https://www.oecd-ilibrary.org/docserver/fead3dca-en.pdf?expires=1728565595&id=id&accname=guest&checksum=74553FD3779EA5C2B28CCA84F13019E3>

4.2.1 *Situational Factors*

The following Figure 1 depicts situational factors, which play a major role for the vulnerability to labour exploitation.



Figure 1. Situational factors raising the risk for labour exploitation.

Financial pressure and limited access to decent work

The right to work for Ukrainian refugees was a key feature of the TPD's implementation across EU member states, and immediate access to the labour market has been granted without extensive bureaucratic processes or delays to promote their self-sufficiency. The right to work, along with other facilitating factors such as higher educational levels of the Ukrainian refugees compared to other refugee groups, as well as the existence of supportive diaspora networks in host societies, led to faster integration into the labour market compared to previous refugee groups.⁴⁶ Figure 2 shows the facilitating factors to labour market integration:

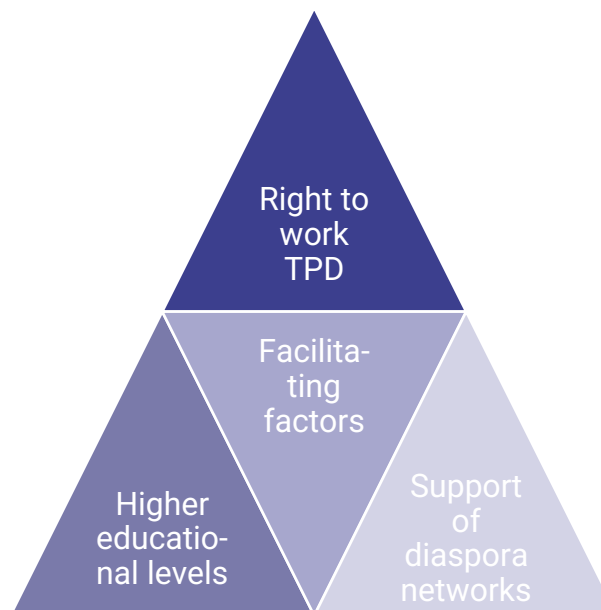


Figure 2. Facilitating factors to labour integration

Nevertheless, challenges in accessing regular work widely remain across the EU, and in the six countries studied. To start with, an OECD report underscores that much of the employment accessed by Ukrainian refugees is in low-skilled jobs, potentially leading to

⁴⁶ Dumont, J.-C., Lauren, A. (2023). *Joining Forces for Gender Equality : the Labour Market Integration Challenges of Ukrainian Refugee Women*. Available at <https://www.oecd-ilibrary.org/docserver/fead3dca-en.pdf?expires=1728565595&id=id&accname=guest&checksum=74553FD3779EA5C2B28CCA84F13019E3>

long-term underemployment.⁴⁷ One of the reasons for the acceptance of lower-skilled jobs is because in most of the countries, the process of recognizing professional qualifications of the Ukrainian refugees is slow, and burdensome:

We think that one of the push factors that drives Ukrainian refugees into illegal practices and also to facilitates the employers to maintain these illegal practices with refugees is the problem with the difficult recognition of professional qualification and diplomas. Because Ukrainian refugees, most of them have high education diplomas, hold high education diplomas and also have professional qualification from Ukraine. This is different from the previous refugee migration force we have experienced in Bulgaria. It is a challenge for our system and we try to advocate and work on projects facilitating recognition and qualification (of diplomas) of Ukrainian refugees.⁴⁸

In addition, a significant factor contributing to the underemployment or lack of formal employment of the Ukrainian refugees is the fact that in most cases the women who arrived take care of children and often elderly people thus having significant **care responsibilities**. According to a survey of the European Union Agency for Fundamental Rights (FRA) among Ukrainian refugees, almost three in ten respondents (28 %) could not work because of responsibilities to care for children, or elderly or sick relatives. This was markedly more often a barrier to employment for women.⁴⁹ Women arrived in host countries which faced childcare shortages *before* the influx of refugees, resulting in heightened competition for limited resources.⁵⁰

⁴⁷ OECD (2023), "What We Know About the Skills and Early Labour Market Outcomes of Refugees from Ukraine", *OECD Policy Responses On The Impacts Of The War In Ukraine*, OECD Publishing, Paris, Available At : <https://doi.org/10.1787/C7e694aa-En>.

⁴⁸ FG (2), G. B., Expert From INGO, Bulgaria

⁴⁹ FRA Survey (2023). Fleeing Ukraine: Displaced People's Experiences in the EU. Available at: <https://fra.europa.eu/en/publication/2023/ukraine-survey>.

⁵⁰ FG (1)-(2) Germany, Bulgaria, Romania

It is hard to find kindergarten in Bulgaria because we can never obtain enough points to get access to the state kindergartens. For us, women-refugees, there need to be additional social criteria to increase the overall score needed to access childcare.⁵¹

These challenges are amplified for women with **limited financial resources, language barriers, or unfamiliarity with the childcare systems** in the host country. Beyond children, many Ukrainian refugee women are responsible for caring for elderly parents or other vulnerable family members who accompanied them in their flight. This significantly increases their care burden, limiting their availability for work.⁵² Moreover, the lack of clarity regarding the duration of displacement and return intentions creates uncertainty that may deter Ukrainian women from long-term investments in host countries, such as language training. This uncertainty is heightened for women separated from family members due to the war.⁵³

Difficulties in accessing information

Lack of awareness of legal rights and available support services are a major obstacle to protecting oneself from exploitation. Language barriers significantly impede access to crucial information. Refugees may be unaware of labour laws, their rights in the workplace, the availability of legal assistance, or the processes for reporting exploitation:

They don't have the pressure to take every job that other people want to offer them. But the usual problem is that they don't know about the labour laws in Germany. This is a normal phenomenon for people from other countries.⁵⁴

⁵¹ FG (3), Bulgaria . In Bulgaria, access to state child care is based on a point system which includes the number of years that the family has lived in the area of the kindergarten, employment status etc.

⁵² FG (1)-(2) Germany, Bulgaria, Romania

⁵³ Dumont, J.-C., Lauren, A. (2023). Joining Forces for Gender Equality : the Labour Market Integration Challenges of Ukrainian Refugee Women. Available at <https://www.oecd-ilibrary.org/docserver/fead3dca-en.pdf?expires=1728565595&id=id&accname=guest&checksum=74553FD3779EA5C2B28CCA84F13019E3>

⁵⁴ FG (1) M. M., expert from NGO, Germany

The complexity of administrative procedures, varying requirements across different countries, and the lack of accessible information in multiple languages contribute to this lack of knowledge and heightened vulnerability:

In Romania, if, for example, you are subject to the employer not being able to pay you the salary or doesn't want to pay you the salary, you can make a request to the territorial inspectorates for labour. The territorial inspectorates for labour can sanction the employer but cannot force the company to recover your salary. To obtain you your salary, for this procedure, you have to go to court where you need a lawyer or you have to request a lawyer from the court, which can be very lengthy in time, and it will for sure, imply some costs. And it discourages the person to access the mechanism that should help them in relation with the employer. Also, if you are being discriminated, we have a council that is combating discrimination. Then you have to make a complaint as best as you can. You will be brought in front of the commission. And the state did not promote, in my opinion, the mechanism to explain to them to the employees.⁵⁵

Insecure or substandard housing, lack of monitoring of private accommodation

In many of the host countries of refugees, governments provide different levels of state-support for housing. Such support ranges from accommodation in state-owned facilities to the payment of rent by the state to certain facilities/centres, to direct support for either landlords or Ukrainian refugees in finding accommodation. While housing support is intended to facilitate the reintegration process and decrease vulnerabilities to exploitation, the research found various shortcomings that in fact heightened the risk of abuse and exploitation. In Germany, substandard housing led to exploitation of the refugees who had to pay the rent and also offer different renovation services :

⁵⁵ FG (2) P. E.-B., expert from NGO, Romania

Housing is provided by the state. So, this means the local job centres pay the rent. And we have had some experience with refugees, no matter where they are from, who had terrible housing conditions, for which they have to pay a lot of rent. No heating, no furniture. Sometimes they were asked to renovate the place, so free labour sort of, and they accepted it because they think it's normal.⁵⁶

Where there is a stretch in government support, either in terms of availability, quality, or affordability, private housing schemes may compensate this with often well-intentioned acts of solidarity. While this wave of solidarity was especially strong in the beginning of the war and provided additional support to Ukrainian refugees by well-intended acts of members of the host society, it is important to note that some exploitation schemes and human rights violations also emerged.

An online survey of Ukrainian refugees, conducted by the FRA between August and September 2022 in ten EU countries, showed that nearly six out of ten respondents were living in a private apartment or house at the time of the survey. Of those, more than half were paying in full or in part for their accommodation. Almost one in five (18 %) adult respondents who were asked about payment mentioned that they did housework or looked after children or older people in exchange for housing.⁵⁷ In the FG discussions, it was reported that in some cases, landlords even demanded sexual favours in return for accommodation:

And we had many reports and interventions done for single women with children who were asked to provide sexual favours to the owners in exchange of delays of payment because the (Romanian) government was not able to provide the financial support in due

⁵⁶ FG (1) A. and G., experts from a language school for refugees, Germany

⁵⁷ FRA Survey (2023). Fleeing Ukraine: Displaced People's Experiences in the EU. Available at: <https://fra.europa.eu/en/publication/2023/ukraine-survey>.

time for the host to receive money... And we had this kind of even announcements published in the official gazettes in media that they would provide accommodation for single women. And they even mentioned ages and things like that. So, we tried to create at the local level some kind of blacklist because the authorities were unable to respond and react at this point. Then this mechanism was replaced by another one where the money was provided to Ukrainians to pay for their rent. But again, the money was provided with a large delay. It (the delay) was like eight months. So Ukrainian women were still under risk. [...] And we know that some of them had to pay for this kind of services.⁵⁸

Other service providers informed that similar abusive demands were also made in cases where the support provided by the government was not sufficient to match market rent prices. This posed specific challenges to Ukrainian women, especially to newcomers in Romania, who were asked to compensate the difference through the provision of sexual favours:

The scheme was like, you know, the landowner accepts your 300 euros rent, but the rent is 500 euro. So how are you going to compensate? So, the situation was put very bluntly to the person. And when no alternative was mentioned, we had reports of this practice (for asking for sexual services) and we tried to encourage them also to seek help from the authorities or simply to leave the accommodation place. It was very difficult because finding another accommodation was also a challenge in itself.⁵⁹

This case illustrates that precarious financial situation, compounded with delays of payment of government support, or insufficient support, in combination with the inadequate oversight of private housing offers, created opportunities for exploitation and abuse.

⁵⁸ FG (2) P. E.-B. expert from NGO, Romania

⁵⁹ FG (2) P. E.-B., expert from NGO, Romania

Respondents in the focus group discussions also reported having difficulties in finding accommodation not only due to financial constraints, but also due to rejections of landowners because of negative stereotypes and distrust related to their nationality.⁶⁰ The surge in negative stereotypes towards Ukrainian refugees was one of the key findings in this report, and it is dealt with in the next section on contextual factors.

4.2.2 Contextual Factors

The following Figure 3 shows prominent contextual factors which increase the risk for trafficking for labour exploitation.

Inadequate Monitoring of Private Accommodation: Private housing schemes, while often well-intentioned, can present risks if not properly monitored, resulting in exploitation and abuse.

Weak Enforcement of Labor Laws: Ineffective enforcement of labour laws, coupled with a lack of awareness of rights among refugees, creates an environment where exploitation can flourish.

Negative Stereotypes: Growing negative perceptions of Ukrainians within host communities can lead to increased risks of exploitation and trafficking, as refugees may become more isolated and less likely to report abuse.

Gender-Based Violence: various forms of gender-based violence, driven by negative stereotypes. Domestic violence at home and in host societies

⁶⁰ FG (3) A. R., GBV expert, Greece

Figure 3. Contextual factors that contribute to higher risk for labour exploitation.

Negative gender stereotypes and gender-based violence

Although criminal investigations on cases of human trafficking among Ukrainian refugees in the six EU countries are incidental, and the expectations of a huge outbreak of trafficking cases were not met,⁶¹ the analysis of existing reports, as well as the FG discussions point at several factors that suggest a high likelihood of underreporting of potential cases.

One of these factors is the high prevalence of gender-based violence, which increases the vulnerability to human trafficking and can also be a precursor to trafficking for sexual exploitation. The experience of gender-based violence of women fleeing the war in Ukraine was recorded by both NGOs and intergovernmental organisations at the on set of the war.

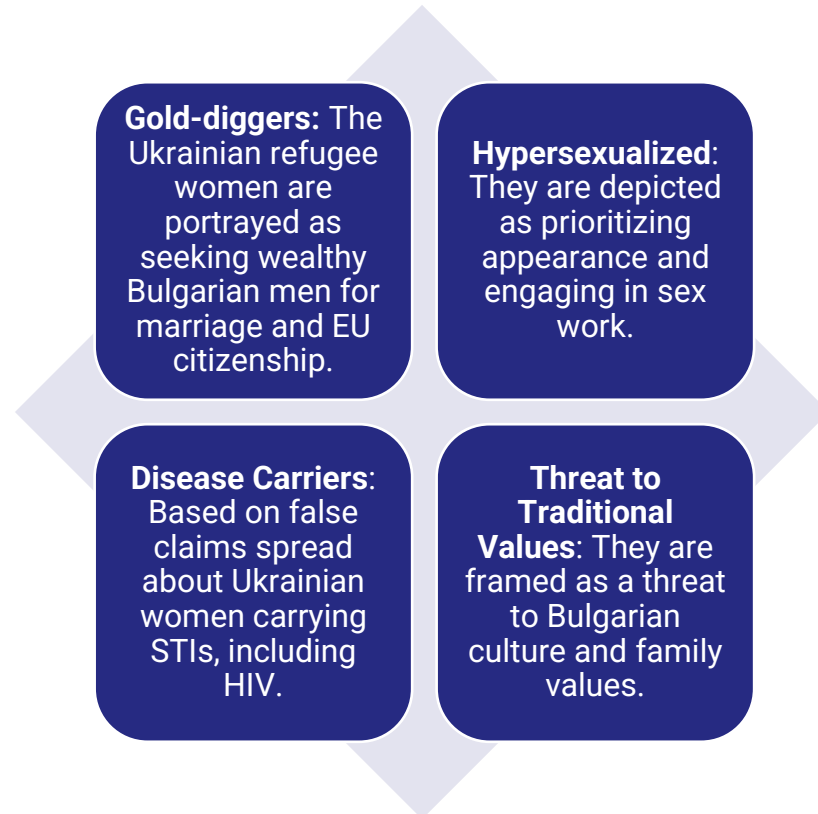
According to a survey among 1,000 Ukrainian refugee women, conducted by the OSCE Office for Democratic Institutions and Human Rights (ODIHR), one in 22 of the interviewed women experienced sexual harassment and one in 50 received proposals to work in the sex industry.⁶² It is very likely that there may be underreporting in this response, as FG participants shared that there is a widespread stigmatization of the Ukrainian refugees as sex workers and survey respondents were likely to be ashamed to report such abuse in order to avoid stigma.

A report of the Center for the Study of Democracy (CSD) in Bulgaria examines gendered disinformation targeting Ukrainian women in Bulgaria as the key factor for the harmful stereotypes of the Ukrainian refugees that have emerged in the society. According to the report, since the beginning of the war in Ukraine, the amount of online content mentioning

⁶¹ IOM (2023). Human Trafficking in the Ukraine Crisis. Regional Anti-Trafficking Task Force - March 2023. Available at https://www.iom.int/sites/g/files/tmzbd1486/files/documents/2023-07/human_trafficking_in_the_ukraine_crisis-final2.pdf

⁶² OSCE (2023). ODIHR Survey on the Safety and Security of Women Refugees from Ukraine. Available at: <https://www.osce.org/odihr/536019>

Ukrainian women in Bulgaria has increased dramatically (92 times), mainly due to pro-



Kremlin narratives. Before February 2022, such content was almost non-existent. The content is analysed via media monitoring of popular online pro-Kremlin news websites (most often 'mushroom sites'), that have been redistributed via Facebook sharing. According to the analysis, there has been a significant spike in the number of articles per month, which amounted on average less than ten before 2022 and an average of around 200 after February 2022.⁶³ The articles convey the negative gendered narratives about the Ukrainian refugee women which are depicted in Figure 4.

Figure 1. Negative gendered narratives about Ukrainian refugee women.

⁶³ Center for Study of Democracy (CSD). Policy Brief No. 148, August 2024 г. Gendered Disinformation Targeting Ukrainian Women Refugees In Bulgaria. Available at: https://csd.eu/fileadmin/user_upload/publications_library/files/2024_8/BRIEF_148_ENG_WEB.pdf

The negative gendered stereotypes about the Ukrainian women were confirmed by the FG discussions in the six EU countries. A humanitarian worker, herself a refugee from Ukraine shared:

Even I face a regular opinion about myself that I am from nightclub or something that I have nothing to do with. And it affects me when I want to find some work. This is the first thing that people think about when they see a young girl in Greece.⁶⁴

The oversexualization of the Ukrainian women also places them at heightened risk of online sexual harassment. Coupled with the 600% spike in the online search for 'Ukrainian porn' and 200% increase in the searches for 'Ukrainian escorts' evidenced by the OSCE report early in the crisis,⁶⁵ there is a clear increase in demand for sexual services, which is an obvious drive for trafficking for sexual exploitation.

An NGO working with Ukrainian refugees in Romania reported that many women have been asked to provide sexual services, or they have been approached in public places, but they are unlikely to report this type of harassment as they are made to believe that it's 'their fault' and they may see the reporting as a means to deepen the stereotypes in a conservative society.⁶⁶ An NGO assessment "Gender-Based Violence in the Context of the Ukraine Crisis" carried out during March and April 2023 in six localities in Romania found that sexual violence is a common issue they face in Romania, particularly in public spaces, including on public transport and in intimate or dating relationships.⁶⁷ Discrimination and derogatory name

⁶⁴ FG (3) A. R., expert from NGO, Greece

⁶⁵ OSCE (2022). 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 at https://www.osce.org/files/f/documents/4/c/516423_0.pdf. Last accessed: 12 November 2024

⁶⁶ FG (2) S. T., NGO expert, Romania

⁶⁷ VOICE and HIAS(2023). **Gender-Based Violence in the Context of the Ukraine Crisis - Romania Assessment.** Available at: https://hias.org/wp-content/uploads/VOICE-HIAS-Romania-GBV-Assesment-Report_Final.pdf

calling in public spaces were reported also by FG respondents – Ukrainian refugee women – in Bulgaria.⁶⁸ Discriminatory attitudes were also reported in accessing medical services.⁶⁹ Thus, negative gendered stereotypes about the Ukrainian women create a hostile environment, which lead to discrimination and prejudice, and subsequently difficulty accessing healthcare, housing, and social services. A hindered access to social services and protection then leads to a risk of marginalization and poverty, which in turn fuels the risk of trafficking for labour and sexual exploitation.

While reports have provided insight on the gender-based stereotypes and violence experience in the host society, this research uncovered another worrying trend that has not merited equal attention. FG discussions with services providers revealed that Ukrainian women returning home to visit husbands often experience domestic violence.⁷⁰ Domestic violence cases are exacerbated because of the adverse and uncontrollable circumstances on the war fronts and the considerable degree of experienced loss of control and frustration faced by the men who were enrolled. The frustration then may lead to aggressive behaviour of the men, fighting at the frontlines, towards their partners. In addition, there is large availability of firearms which can also be used as threats in cases of aggressive behaviour.⁷¹ FG discussions raised concerns about under-reporting of domestic violence at home:

Gender-based violence is indeed one issue that we see and we are not even aware of the full magnitude of the issue at this point, because as you (other participant) mentioned as well, the cases are under-reported and what we hear from the Ukrainian women and what we see is that authorities and figures and also service providers are romanticizing what

⁶⁸ FG (2) Bulgaria

⁶⁹ Ibid

⁷⁰ FG (2) S. L. and B. B., experts from NGOs, Romania

⁷¹ Kvinna till Kvinna Foundation, article Published 12 December 2023. The Increase Of Gender-Based Violence in Ukraine amidst Russia's Full-Scale Invasion. Available At: <https://Kvinnatillkvinna.Org/2023/12/12/The-Increase-Of-Gender-Based-Violence-In-Ukraine-Amidst-Russias-Full-Scale-Invasion/>

the Ukrainian men are doing in Ukraine, protecting the countries and serving the country. And that's the discourse that they hear, which puts a lot of pressure on them and discourage them to disclose a situation of gender-based violence. So that's one of the issues that we've noticed as well, which makes it very hard to get a full picture of the magnitude of the issue.⁷²

High levels of tolerance to domestic violence and fear of being stigmatised were also quoted as reasons why women rarely reported and sought psychological support.

I can add, it's in line also with what Stephan was saying, similar to in Ukraine, the views around violence in a romantic relationship is very similar in Romania. A little bit of violence is absolutely normal, it is acceptable, is not seen as an issue. So, the biggest challenge that we face in communicating about gender-based violence is supporting the woman that we work with to recognize that it is an issue.⁷³

In these cases, although the abuse does not take place on the territory of the host societies, domestic violence has also been reported in the destination countries of Ukrainian refugee women. It happens with partners they met in the host societies or with partners with whom they arrived, especially among older couples or in couples with men with dual nationality, who are not subject to military conscription.⁷⁴

We came from Nikopol, and for two years now the city has been bombed six to ten times a day. My relatives: my daughter, son, grandchildren are there. And do you understand my condition when I know this constantly? We also had serious problems with my husband.

⁷² FG (2) B. B., expert from NGO, Romania

⁷³ FG (2) B. B., expert from NGO, Romania

⁷⁴ FG (2), Bulgaria and Romania

There were constant arguments. I received advise from someone Ukraine to take medication.⁷⁵

Regardless of the country or situation of domestic violence, it is important to note and address this as a key risk factor, undermining the resilience mechanism of Ukrainian women, normalizing violence, and making them more susceptible to exploitation and specifically, to trafficking for sexual and labour exploitation.

Weak enforcement of labour laws

The weak enforcement of labour laws, another situational factor increasing vulnerability, is dealt with in more details in the next chapter, which outlines evidence of labour exploitation in the six countries studied.

⁷⁵ Women circle Sofia on 17 June 2024, Viktoria, 54 years old

5. Labour exploitation

The challenges in accessing sustainable, regular, and gainful employment, together with the vulnerability factors listed above can explain the extensive irregular employment and widespread patterns of labour exploitation among Ukrainian refugees across the six EU countries. Based on the FG discussions with service providers and refugees, it could be concluded that labour exploitation is not isolated but a prevalent phenomenon affecting Ukrainian refugees in various sectors, with violations falling at both ends of the spectrum: from administrative offences and labour law violations to possible cases of forced labour and trafficking for labour exploitation and even for criminal activities. The most commonly reported sectors are agriculture (Romania, Bulgaria), hospitality and tourism (Bulgaria, Greece, Slovenia), meat processing and small factories (Poland) and the online market (Romania). These situations described in the FG discussions most frequently involve wage theft and excessive working hours (Section 5.1), work without any contracts or with unclear contractual arrangements (Section 5.2), work in unsafe working conditions (Section 5.3), sexual exploitation (Section 5.4), and overlapping forms of exploitation (Section 5.5).

5.1 Wage theft and excessive working hours

The cases reported by in the FG illustrated scenarios where promised wages were not paid, either completely or partially. This often involved initially offering payment for a set amount of time and then withholding the money (with “fake promises,”) or delaying payment indefinitely. Workers were expected to work far beyond the agreed-upon hours, receiving the same low pay despite the extra labour. In some cases, Ukrainian refugees were offered a contract, but the salaries were not mentioned, or if they were mentioned, they were paid for less than the actual working hours. The employers abused the position of vulnerability

of the Ukrainian refugees who were not aware of the existing labour laws and the local reporting mechanisms:

We see now persons working long hours, but they are paid for eight hours in restaurants and mainly in services in hospitality and Bucharest, Cluj, and Sibiu. There are some Ukrainians that accepted to work without a labour contract and their negotiation was for eight hours a day, but they are working 12 hours for the same salary, at least one day.⁷⁶

It was an online market...They've been exploited in an industrial space where they've been employed to pack clothes. The company was delivering clothes all over Europe and they had the order from, and Ukrainians had to pack all these clothes and they were living in the same industrial area. The employer said, "Well, you don't need money because you have some food here, so you are away from the city. You don't need money now. When your contract is ending, you'll receive the money." Based on this situation, the authorities said "Well, we don't know exactly that there was an exploitation."(...) Maybe they would have been paid in the end of their work. However, during the period of a few months, because there are a few groups of people recruited in different periods of time, none of them was paid. Even if there were promises to be paid next month or next week, that payment was delayed.⁷⁷

In some cases, involving irregular working conditions including wage theft, the employment is initiated via intermediaries. Such intermediaries can also include recruitment or 'labour agencies', as in one particular case described by participants in the FG discussion in Poland. According to the respondents, in some cases, these intermediary

⁷⁶ FG (2), S. T., NGO expert, Romania

⁷⁷ Ibid

companies are managed by Ukrainian nationals. Such agencies were used to recruit people to work in small factories, in substandard conditions, and excessive working hours.⁷⁸

Women's circles discussions with Ukrainian refugees in Bulgaria provided insight into widespread **discriminatory practices** of the employers towards Ukrainian refugees. These practices included lower payments for the same type of work and same work position, different provisions in their employment contract regarding the probatory period and notice period for termination, or simply negative attitudes from the employer and co-workers in the work place:

I also had a short experience of working here, and I also felt the discrimination, which was that Bulgarians were treated one way and Ukrainians were treated differently. This was a shop, I worked as a sales assistant. And I could feel this difference. I didn't hear anybody making the Bulgarians work faster, and they were making us Ukrainians work faster. That was offensive to me.⁷⁹

5.2 Work without any contracts or with unclear contractual arrangements

The FG discussions revealed that employment of Ukrainian refugees often occurs without formal employment contracts, leaving workers vulnerable and without recourse if exploited. Participants reference the high prevalence of unregulated labour in the **agricultural sector**, resulting in significant underpayment and poor working conditions.

In Romania, what we see is mainly labour exploitation. Ukrainians are asked to work long hours in agriculture, for example, in the fall (season). They've been involved in different

⁷⁸ FG (1) K.I. and A. W., experts from NGO, Poland

⁷⁹ Women circle Sofia on 17 June 2024, Elena

agriculture aspects with a different promise of specific salary. And in the end, for example, to pick up grapes or corn, and they have a promise for a salary for a fee per day, but in the end, they never get that amount of money. So, fake promises.⁸⁰

The **tourism sector** is also a place for informal work in Slovenia, Bulgaria, and Greece, where refugees are concentrated in tourism areas with seasonal work, which offers less protection compared to other sectors of the economy. Refugees work in hospitality, frequently with verbal agreements and are significantly underpaid. In Slovenia, humanitarian workers came across irregular employment, without contractual arrangements in the Adriatic coast. Ukrainian refugees worked in the field of hospitality with promises for payments in cash. In addition, NGOs reported on suspicious adds targeting Ukrainian refugees for seasonal work, which were then reported to the police.⁸¹

In Bulgaria, Dignita foundation published two analytic reports on risky job adds targeting the Ukrainian refugees. The reports outlined the following seven “red flag” indicators, signalling suspicious employment that could amount to labour law violations, or even trafficking for labour exploitation:

- The employer was either asking for personal information (photo, ID/passport) or no documents were required at all, not even a CV or cover letter.
- No information about the employing company was available.
- It was not a problem if the job applicant did not have the qualification necessary to perform the job listed in the ad.
- There was no contract or there was no information if there was a contract provided.
- No information on the working conditions was disclosed.
- The application procedure involved only sending some requested documents or there was no information on the application procedure.

⁸⁰ FG (2) S. T., expert from NGO, Romania

⁸¹ FG (3) M. R., expert from NGO, Slovenia

- The actual job did not fully correspond to what was described in the advertisement or there was no information on whether it corresponds or not.⁸²

In the second report, particular attention was given to the tourism and construction sectors, where it was established that many of the ads with the highest risk (several red flag indicators) were exactly in these two sectors.⁸³

FG respondents confirmed that irregular and risky practices of employment continue in Bulgaria in the *hospitality* and *tourism* sectors:

Most of the Ukrainians are employed legally or illegally in the hospitality and tourism business, also given the fact that the area of accommodation they have across the Black Sea coast and also in the winter resorts. We have information that people work long hours and are paid for 8 hours or even for half their work, but they are forced by the by the circumstances, to accept this offer.⁸⁴

A specific push factor into the grey economy emerged in Bulgaria, which is particular for those refugees who are enrolled in the humanitarian aid programme. The programme, which includes accommodation in one of the designated state facilities, is available to refugees unless they have an employment contract. If regular employment is found, access to the programme is terminated.

Some of these vulnerable groups are single mothers with three or more children, let's say. Also, elderly people, very sick people with disabilities, among others. And they can stay in this accommodation if they do not work. But as you can imagine, most of them do not have any other income or very limited income from Ukraine. And they are in a

⁸² Dignita Foundation (2023). Analytical Report: Research on the Job Search Risk of Ukrainian Refugees in Bulgaria: Summer 2023. Available at: <https://drive.google.com/file/d/1XKXwpoV23nRHBb9xGxmK4sEPVV6KXX4v/view>. Last accessed 12.11.2024

⁸³ Ibid

⁸⁴ FG (2) G. B., expert from INGO, Bulgaria

situation to accept job offers and possibilities outside of the legal labour market...There are lot of fraudulent possibilities for labour exploitation, and we are aware of it.⁸⁵

In a discussion with Ukrainian refugee women in Varna, who take part in the humanitarian aid programme, the limited of access to formal employment was the number one challenge outlined for their subsistence and effective social integration. In many cases, these were mothers with several children, who lived in state provided accommodation, but still needed financial resources to provide for their children and elderly:

We would really wish to have the opportunity for formal employment. Even some minimum form of official employment. So that we could make some money and care for the children.⁸⁶

Notably, Romania has taken the opposite approach, designating employment as a prerequisite for accessing accommodation support. However, other studies reveal that this approach has also exacerbated vulnerabilities particularly for people without income who lost access to accommodation and were thus more likely to employ desperate subsistence strategies.⁸⁷ NGO respondents in Romania refer to cases of eviction of refugees from state accommodation, as they were not in employment. Some elderly refugees in fact had to undertake risk migration back to Ukraine as they could not find work and did not meet the age or employment requirements to remain in the state accommodation. The risk of human trafficking to those, who were left on the streets with no jobs, income or support network is quite evident.

⁸⁵ FG (2) Ibid

⁸⁶ Women circle Varna on 17 July 2024

⁸⁷ Sharapov, K., Komenda, H. & Gheorghiu, M. (2024). Vulnerability to Trafficking in Persons in the Context of the War in Ukraine. Findings from Poland and Romania. Available at https://reliefweb.int/attachments/0f72f244-df6b-4bb1-aa64-426292ca5567/Vulnerability%20to%20TIP_war%20in%20Ukraine_Poland%20and%20Romania_August%2024.pdf, p. 34.

In Greece, while work without contracts can constitute administrative offence, some respondents stated that criminal proceedings for trafficking cases of Ukrainian refugees in the hospitality sector for seasonal work were already launched .

So, the main risk in Greece, I think, is seasonal work in the islands. Many Ukrainians apply for temporary employment protection in Greece for this kind of work, seasonal work, especially from May till October. And in many cases, the work is not legal and carries many risks. And also, as we know from the statistics of our Embassy, the Ukrainian Embassy in Greece, that now there are three criminal proceedings. And three citizens of Ukraine have been recognized as victims in this area, in this employment seasonal work... Not only agriculture, most of them are women, working in hotels, working in hospitality.⁸⁸

The findings of the FG discussions on excessive working hours and working without a contract are confirmed by the results of quantitative research in the two of the countries studied: Poland and Romania. Surveys among 727 respondents – Ukrainian refugees in Romania and 3,759 respondents in Poland revealed that 28% of respondents in Romania and 27% of respondents in Poland reported working excessively long hours. 12% of respondents worked without a formal employment contract in Romania and 19% did so in Poland.⁸⁹ Thus, the UNHCR report reveals that these labour law violations are not incidental in Romania and Poland, but rather prevalent practices, which are likely to be widespread in

⁸⁸ FG (3) A. R., GBV expert from NGO, Greece

⁸⁹ UNHCR, (2024). Regional Protection Profiling and Monitoring, Protection Risks and Needs of Refugees from Ukraine.

<https://app.powerbi.com/view?r=eyJrIjojYTI5NDY3ZDIhNTYzMi00YTY0LTkzYzQtNTcwOTJjOWJiYzExIiwidCI6ImU1YzM3OTgxLTY2NjQtNDEzNC04YTBjLTY1NDNkMmFmODBiZSIsImMiOjh9>

all the six countries studied, and especially those with high percentage of informal economy as part of the GDP.⁹⁰

5.3 Work in unsafe working conditions

Another aspect of Ukrainian refugees' engagement in the informal economy is working without contracts and in unsafe labour conditions. Evidence of such practices was provided by the Ukrainian refugee women in Bulgaria during the women's circles, but it is likely that such cases exist in all the participating countries, as there is a large percentage of involvement in irregular work:

My mother, 53 years old, started work and was supposed to glue the stickers on bottles and on cans, but in practice, she used to lift 15 kg cans and now she has chronic conjunctivitis. This was without a work contract, she had to work with talc and she got allergies.⁹¹

Yes, I worked and got paid in cash every Sunday, unofficially. It was manufacturing, they were making sports fluids for athletes. There were two Ukrainians working there, and when my colleague left, I had to work for two people. They made Ukrainians do all arduous, physical work. I found this job through acquaintances. There was no contract,

⁹⁰ With 31.2% of the GDP, equivalent to EUR 12.8 billion, the informal sector among the European Union countries is the largest in Bulgaria, according to the figures of the international consulting company. The share of the informal economy in Romania in 2013 was about 28.4% of its GDP, equivalent to EUR 39.5 billion - almost as much as the entire economy of Bulgaria, which reached EUR 41.2 billion. Source: Bulgarian Industrial Association, Study: Bulgaria Has the Largest Grey Economy In The EU, Available at <https://en.bia-bg.com/service/view/15828/#:~:text=With%2031.2%25%20of%20the%20GDP,Kearney%22%2C%20Standard%20daily%20reports.>

⁹¹ Women circle Sofia on 17 June 2024, Yulia, 34 years old

neither labour nor civil, but the employer paid us regularly. There was certainly discrimination.⁹²

5.4 Sexual exploitation

While sexual exploitation is not the subject of this study, it is noteworthy that FG respondents reported on cases of sexual exploitation in several countries. In Greece, respondents referred to Ukrainian women working in nightclubs, where in some cases they were recruited to work as hostesses, but pressure and coercion was applied for them to offer sexual services:

I just say that all these young girls who are working there here in nightclubs, they don't have documents to work. They are not working legally. There is no control of these places. Police raids are not happening. For these two years, I was asking girls, if at any time that police were coming to these places. But, no, nobody was asking for their documents.⁹³

In Slovenia, similar situations were described, with some women returning to the same exploitative situations after brief stays in shelters.⁹⁴ In such cases, the aforementioned societal stigmatisation and victim-blaming hinder proactive reporting. In addition, general mistrust towards the authorities, which is especially prevalent in former communist regimes, prevents women from reporting any kinds of human rights violations.

5.5 Overlapping forms of exploitation

An interplay between labour exploitation and a possible risk of sexual exploitation transpired through some cases reported in FG discussions in Germany and Slovenia. In

⁹² Women circle Sofia on 17 June 2024, Oksana, 49 years old

⁹³ FG (3) A. R., GBV expert from NGO, Greece

⁹⁴ FG (3), Greece and Slovenia

Germany, participants described cases where farmers posted advertisements for work in agriculture, but were actually looking for women to marry:

We recently had a request in our Job Companion project by a local farmer, who was looking for labour force from Ukraine, so he was looking for Ukrainian refugees to help in the farm, but actually, it turned out that his son is looking for a wife. So, I think that's a potential risk, because when the Ukrainian refugees want to integrate, want to work here, they might get caught in these kinds of situations, and possibly when they're in the rural area, like the farm in the middle of nowhere, they don't know how to get out of this situation. I think that's a risk because so many farms have farmers who are single and are looking for a wife.⁹⁵

Similarly, in Slovenia, advertisements were published for accommodation offers, that in fact also involved expectations for household work. In other instance, FG respondents also mentioned that some men visited the accommodation centre in Logatec, quickly offering marriage proposals to Ukrainian women.⁹⁶ These proposals can conceal different forms of exploitation, such as trafficking for the purpose of sham marriages or for labour or sexual exploitation.

Finally, FG discussions revealed worrying examples where Ukrainian refugees were lured into lucrative job adds for legitimate work in the transportation field, but were in fact involved in criminal activities:

I also sometimes myself get this very lucrative job ads that offer \$10,000 for VIP transportation services. And unfortunately, Ukrainian nationals are among the top nationalities that fall victims to these lucrative ads that offer such jobs. But as Mansa

⁹⁵ FG (1) A. and G., experts from a language school for refugees, Germany

⁹⁶ FG (3) M. M., expert from humanitarian NGO,, Slovenia

mentioned, these are smuggling rings in the context of Western Balkan mixed movements. So, the migrants and asylum seekers coming through Slovenia hoping to get to Italy and further on often use the services of these smugglers.⁹⁷

FG participants shared that such ads appeared also in Facebook groups of Ukrainian refugees and even women with children responded, unaware that illicit activities stood behind such ads. Currently, some Ukrainian refugees who were tricked by these job offers are being charged with human smuggling and, according to participants, several prison sentences have already been handed down.⁹⁸ While there could be participation of Ukrainian nationals in smuggling rings, there needs to be due attention given to the possible exploitation of vulnerability of Ukrainian refugees for the purposes of trafficking for criminal activities.

The FG discussions reveal a significant and multifaceted problem of labour exploitation targeting Ukrainian refugees. The wide range of exploitative practices, ranging from administrative offences to possible cases of forced labour and trafficking for labour exploitation and criminal activities, require further analysis and a comprehensive strategy to address these violations with stronger legal protections, targeted checks in risk sectors and forms of employment, with emphasis on seasonal work, along with improved access to information and measures to combat discriminatory practices and mistrust in authorities.

⁹⁷ FG (3) O. B., expert from humanitarian NGO, Slovenia

⁹⁸ FG (3) M. R., expert from NGO, Slovenia

6. Resilience Factors and Positive Practices Diminishing the Risk of Labour Exploitation

The interplay between personal, contextual, and situational factors significantly increases the risk of trafficking for labour exploitation, as already shown in Chapter Four, resulting in a variety and wide prevalence of exploitative practices in the six countries studied., as illustrated in Chapter 5. However, there are also resilience factors which reduce the risk of exploitation, which will now be discussed.

The most important resilience factors inherent to this group of displaced persons are the strong social networks, including those pre-existing in host countries, which provided support to the influx of refugees. These networks offered familiarity, emotional support, information sharing, and assistance with navigating employment and housing, reducing isolation and dependence on potentially exploitative actors.⁹⁹

In Bulgaria, Ukrainian diaspora founded civil society organisations which were incredibly active and effective in providing humanitarian support to the wave of Ukrainian refugees. FG discussions confirmed the importance of social networks in building resilience and supporting the integration processes, especially in countries such as Poland, which has the largest Ukrainian diaspora in Europe. Along with diaspora, emerging support networks between the newly arrived women refugees themselves also acted to reduce their vulnerability:

⁹⁹ OECD (2023), “What We Know about the Skills and Early Labour Market Outcomes of Refugees from Ukraine”, OECD Policy Responses on the Impacts of the War in Ukraine, OECD Publishing, Paris, <https://doi.org/10.1787/c7e694aa-en>.

We have to say that the mothers [who came to Germany] are very well connected together. They built networks really fast, and especially those with higher educated status and they quickly integrated into the German culture.¹⁰⁰

Additional factors decreasing the immediate vulnerability to human trafficking include, as aforementioned, the swift access to legal status through the enactment of the EU Temporary Protection Directive. The application of the Directive, along with the immediate and extensive response from international organisations, governments, and individuals, provided refugees with essential necessities such as food, shelter, and transportation, thereby diminishing vulnerabilities at the onset of the crisis.¹⁰¹

Positive examples were also provided by FG discussions, illustrating initiatives for facilitating the access to sexual and reproductive health services to women and girls from Ukraine, particularly from marginalized groups by Contraception and Sexual Education Society, Romania.

We stated using a more integrative approach, providing information regarding accessing health services through the public health care system, which was very challenging and still is. We facilitated access to gynaecological consultations, ultrasounds, abortions, medical treatment. And we provided an all-around approach supporting the Ukrainian women and girls from the starting point through the transportation, translation, the consultation itself, and then the treatment recommended

¹⁰⁰ FG (1) M. M. expert from NGO, Germany :

¹⁰¹ IOM, (2023) Human Trafficking in the Ukraine Crisis , **Regional Anti-Trafficking Task Force**. Available at https://www.iom.int/sites/g/files/tmzbd1486/files/documents/2023-07/human_trafficking_in_the_ukraine_crisis-final2.pdf

by the doctor and any other relevant information regarding their conditions and next steps.¹⁰²

Support in finding accommodation by the Jesuit Refugee Service (JRS) Romania, a Catholic organisation that provides education, protection, and integration for refugees, asylum seekers, migrants, and stateless persons, and the Slovenian Red cross are also examples of initiatives that serve to reduce the vulnerabilities to human trafficking and other forms of abuse related to finding secure accommodation illustrated in the previous sections.

As Slovenian Red Cross provided support in that period in the reception and accommodation centres, but also to other people that were privately accommodated, which is now the case. More than 90 percent of them are in private accommodation throughout the country. Support provided on the ground for private accommodation was through our local branches. We have 56 of them in Slovenia. We have 890 local organisations. This is to say that we are very locally present, and we have a strong network to provide services on the ground.¹⁰³

We work with communities, and I can tell you that in these two years, we had more Ukrainian employees than Romanians. We had like 180 Ukrainians employed in the organisation while we had only 30 Romanians. We prefer to have this approach by getting closer to the communities and trying to discuss with the communities instead of using interpreters or transistors or intermediaries. We rented more than 300 apartments for Ukrainian refugees in Romania and we do the same for other migrants also present in Romania through different projects.¹⁰⁴

¹⁰² FG (2) B. B., expert from NGO, Romania

¹⁰³ FG (3) M. M., expert from humanitarian NGO, Slovenia

¹⁰⁴ FG (2) S. L., expert from NGO, Romania

Having in mind the risk factors related to provision of accommodation and private housing described in previous chapters, such initiatives are especially valuable in inhibiting possibly negative situational factors. In addition, providing humanitarian assistance and improved access to services, international organisations note that proactive anti-trafficking initiatives, including awareness campaigns and improved inter-agency collaboration, build resilience to trafficking.¹⁰⁵ FG discussions also provided examples of broad awareness raising initiatives:

Maybe the first thing that comes to mind was something we did with Kljuc last year (Slovenian anti-trafficking NGO). I think that's something that Kljuc is doing regularly, just sharing as many printed information as possible to all sorts of locations where people might be trafficked. We have some business cards and small cards even in petrol stations... and also at the police stations and doctors offices, there is some information left.¹⁰⁶

In Bulgaria, Dignita foundation conducts regular prevention activities among Ukrainian refugees, raising awareness about the risks of human trafficking based on empirical research, but also outlining avenues for labour market integration. The so-called 'Women's circles' empower the refugee women by providing them information about their labour rights in Bulgaria, the specifics of the local labour market, current employment opportunities, as well as the risks associated with irregular employment and trafficking for labour exploitation. In addition, Dignita provides individual consultations to Ukrainian

¹⁰⁵ OECD (2023), *Joining Forces for Gender Equality: What is Holding us Back?*, OECD Publishing, Paris, <https://doi.org/10.1787/67d48024-en>

¹⁰⁶ FG (3) O. R., expert from INGO, Slovenia

refugees looking for work, or to those experiencing labour law violations.¹⁰⁷ In Germany, the government-led ‘Turbo Job program’ provides support to refugees looking for work and helps them integrate into the labour market, after completing the language course.¹⁰⁸

While the quick response at EU level with the enactment of the TPD, along with the humanitarian aid, initiatives by non-state actors to combat human trafficking and support for social network factors has significantly reduced the *immediate* vulnerability of Ukrainian refugees, international organisations warn that a *delayed* vulnerability may emerge as the conflict prolongs, and resources are depleted.¹⁰⁹

According to an IOM report on human trafficking in the Ukraine crisis, delayed vulnerabilities refer to the increased risk of trafficking that emerges *after* the initial acute phase of a crisis, as the coping mechanisms of vulnerable populations wear down and long-term consequences of displacement and conflict take hold. Such delayed vulnerabilities were addressed in the previous chapters and include depletion of financial

¹⁰⁷ Dignita Foundation (2023). Dignita's Women's Circle, Empowering Ukrainian Refugee Women, was Held for the Second Time in Varna. Available at:

<https://www.dignita.bg/articles/%D0%BE%D0%B2%D0%BB%D0%B0%D1%81%D1%82%D1%8F%D0%B2%D0%B0%D1%89-%D0%B6%D0%B5%D0%BD%D1%81%D0%BA%D0%B8-%D0%BA%D1%80%D1%8A%D0%B3-%D0%BD%D0%B0-%D0%B4%D0%B8%D0%B3%D0%BD%D0%B8%D1%82%D0%B0-%D0%BD%D0%B0%D1%81%D0%BE%D1%87%D0%B5%D0%BD-%D0%BA%D1%8A%D0%BC-%D1%83%D0%BA%D1%80%D0%B0%D0%B8%D0%BD%D1%81%D0%BA%D0%B8%D1%82%D0%B5-%D0%B1%D0%B5%D0%B6%D0%B0%BD%D0%BA%D0%B8-%D1%81%D0%B5-%D0%BF%D1%80%D0%BE%D0%B2%D0%B5%D0%B4%D0%B5-%D0%B7%D0%B0-%D0%B2%D1%82%D0%BE%D1%80%D0%B8-%D0%BF%D1%8A%D1%82-%D0%B2%D1%8A%D0%B2-%D0%B2%D0%B0%D1%80%D0%BD%D0%B0t>

¹⁰⁸ FG (1) A. and G., experts from a language school for refugees, Germany and Bundesministerium für Arbeit und Soziales (22.12.2023). Getting started with Job-Turbo. Available at <https://www.bmas.de/DE/Arbeit/Migration-und-Arbeit/Flucht-und-Aysl/Turbo-zur-Arbeitsmarktintegration-von-Gefluechteten/Informationen-Englisch/Informationen-fuer-Gefluechtete-EN/informationen-fuer-gefuechtete-en-art.html>

¹⁰⁹ IOM, (2023) Human Trafficking in the Ukraine Crisis , **Regional Anti-Trafficking Task Force**. Available at https://www.iom.int/sites/g/files/tmzbd1486/files/documents/2023-07/human_trafficking_in_the_ukraine_crisis-final2.pdf

resources, as refugees' savings and access to financial support dwindle over time and this economic precariousness increases their susceptibility to exploitative practices, erosion of coping mechanisms, and increased social isolation and negative public perceptions, which were flagged by this research. In addition, shifting dynamics, such as returns to Ukraine, or diminished access to services or status changes, such as possible expiration of temporary protection, are flagged by IOM as possible delayed vulnerabilities.¹¹⁰

To address these delayed vulnerabilities, sustained humanitarian aid and protection programs are needed, along with anti-trafficking initiatives and systematic monitoring and assessing of vulnerable groups, especially after an initial displacement and during secondary movements, in order to mitigate the existing risks.

¹¹⁰ IOM, (2023) Human Trafficking in the Ukraine Crisis , **Regional Anti-Trafficking Task Force**. Available at : https://www.iom.int/sites/g/files/tmzbd1486/files/documents/2023-07/human_trafficking_in_the_ukraine_crisis-final2.pdf



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7. Conclusion and Recommendations

This report highlights the complex and evolving vulnerabilities to labour exploitation faced by Ukrainian refugees in six the EU countries and the risk of human trafficking. While the initial response from the EU and various organisations mitigated immediate risks, several factors emerged that perpetuate the risk of exploitation over time.

The current report provided evidence-based analysis on the interplay between personal, contextual, and situational factors that increase the vulnerability of Ukrainian refugees to human trafficking. Specific groups, such as single mothers with large families, Roma women, elderly people, people with disabilities, and UAM are disproportionately vulnerable to trafficking due to personal factors. Men fleeing mobilization also constitute a newly emerging vulnerable group that should merit additional attention and response in order to mitigate high risk of trafficking both at the borders and within the host countries.

The report illustrated how financial pressure, limited access to decent work, including due to the substantial care obligations or refugee women, together with the difficulties in accessing information and in securing safe housing interact as key situational factors that increase the vulnerability to exploitation and trafficking in human beings. Inadequate monitoring of private accommodation and weak enforcement of labour laws further exacerbate the vulnerability of Ukrainian refugees. Delays in government support for housing contributes to augmented risk to those groups, already living in precarious situation.

A worrying trend established by desk research and confirmed by the FG participants, both humanitarian workers and refugee women, is the raise in negative gender-based stereotypes and discrimination against Ukrainian refugee women. These negative



stereotypes create a hostile environment, hindering access to services and increasing the risk of exploitation.

The report uncovered widespread instances of labour exploitation in the six countries studied, across various sectors. This involved wage theft, excessive working hours, and unsafe working conditions, frequently without formal contracts or legal protection. The informal nature of much of the employment exposes Ukrainian refugees to exploitation and abuse.

This exploitation is not confined to isolated incidents; it is rather a widespread issue with violations ranging from minor administrative offenses to potential cases of forced labour and even trafficking for criminal activities. The most common sectors affected are:

- **Agriculture:** This sector often involves unregulated labour, excessively long working hours, underpayment, and a lack of formal employment contracts, leaving workers vulnerable to exploitation. Promises of specific salaries are frequently broken, with workers receiving far less, or nothing at all.
- **Hospitality and Tourism:** Similar issues arise in these sectors, particularly during peak seasons. Seasonal work often includes low pay, long hours, and precarious working conditions. Many employers exploit the vulnerable position of refugees who live in precarious situations and lack knowledge of their rights, access or legal recourse. Moreover, isolated locations, such as those found in rural areas or on islands, increase the risk of exploitation.
- **Manufacturing and Small Factories:** Work in this sector is often unregulated, lacks formal contracts, and features unsafe working conditions. Employers frequently abuse the vulnerable status of Ukrainian refugees, demanding excessive work hours for low pay, and ignoring labour laws.
- **Exploitation for criminal activities:** A worrying example of exploitation of Ukrainian refugees for smuggling activities through false ads for VIP transportation

services emerged in Slovenia. Additional research is needed to look into these cases, some of which ended up with enforced prison sentences, to see whether these were possible cases of trafficking for criminal activities.

Along with these factors, which, when overlapping, increase the vulnerability of Ukrainian refugees to human trafficking, the report also identified resilience factors that reduce this risk. The presence of strong diaspora networks, combined with EU-level support and assistance from various organisations, helped mitigate immediate risks. However, these factors cannot fully compensate for the longer-term, delayed vulnerabilities discussed above.

Based on the findings of this report, the following policy recommendations are proposed to mitigate the vulnerabilities of Ukrainian refugees to human trafficking for labour exploitation:

1. Increase understanding and awareness of human trafficking for labour exploitation:

- **Conduct in-depth country-specific empirical research:** collect data, in consultation with experts and frontline responders, on specific risk sectors and exploitative practices involving Ukrainian refugees and other vulnerable groups to trafficking for labour exploitation. Findings should be used to formulate policies and also to conduct priority labour inspections.
- **Information dissemination:** Create easily accessible information for Ukrainian refugees, outlining country-specific labour laws, protection measures, reporting and complaint mechanisms, and contact information for support services. Disseminate this information across diverse channels for communication of Ukrainian refugees (social media groups, Telegram groups, Ukrainian NGOs and community centres).

- **Raise public awareness:** Conduct general public awareness campaigns and provide clear reporting mechanisms for suspected cases of labour trafficking. This is especially relevant for seasonal employment, in vulnerable sectors such as tourism and hospitality, where regular clients can come into direct contact with cases of labour law violations and exploitation. Include cases/stories of exploitation of Ukrainian refugees and other migrants as a vulnerable group to raise public sensitivity about exploitation. Include information on hotlines and referral mechanisms.

2. Strengthen legal frameworks and enforcement:

- **Enhance labour law enforcement:** Implement robust mechanisms to monitor and enforce labour laws, addressing issues of wage theft, excessive working hours, discriminatory practices and unsafe working conditions in all sectors, particularly those where Ukrainian refugees are overrepresented (agriculture, hospitality, manufacturing). Increased inspections and penalties for violations are essential to act as deterrent and increase the cost of exploitation.
- **Address gaps in identification and support of victims:** Establish clear indicators and protocols for identifying and supporting victims of labour exploitation, especially for labour inspectors and other frontline workers.
- **Conduct trainings for labour inspectors:** Training should focus on priority risk sectors and the respective exploitative practices, including, but not limited to wage theft, excessive working hours, and unsafe working conditions. Trainings should cover indicators of human trafficking, as well as the specific legal frameworks in place for protecting vulnerable workers and the differences in laws across the six countries studied.
- **Improve identification of trafficking victims:** Conduct trainings for frontline workers. Training should include information on recruitment and control mechanisms, exploitative practices, and vulnerable groups, with a particular

focus on Ukrainian refugees. Training should be based on empirical research, such as the current study, and should enhance the ability to identify victims of labour exploitation, including indicators of forced labour, coercion, and debt bondage. They should include information on the National Referral Mechanisms, as well as the available support services for victims in the particular country.

- **Build capacity of law enforcement and prosecution on investigating and prosecuting labour exploitation:** Conduct capacity building trainings for law enforcement and specialized units within law enforcement and prosecutorial services with specific expertise in investigating and prosecuting trafficking cases. This should include training in relevant areas such as financial investigations and forensic analysis of digital evidence. Provide specialised trainings to law enforcement for conducting culturally sensitive, trauma-informed interviews of victims of trafficking, who have fled Ukraine after the start of the war. Training should also focus on the particular risk groups and personal factors, outlined in this study.

3. Enhance protection and integration measures:

- **Guarantee access to adequate housing:** Implement state-funded schemes and monitor private housing provision, ensuring safe and affordable accommodation that protects against exploitation and abuse.
- **Address gaps in childcare and elderly care:** Expand access to quality and affordable childcare and elderly care services to support single mothers and other caregivers, facilitating their entry into the formal labour market. In countries with deficits in state-supported child care, promote and incentivise child care facilities established by NGOs, and Ukrainian NGOs in particular.

- **Facilitate recognition of qualifications:** Streamline the process of recognizing professional qualifications from Ukraine, enabling Ukrainian refugees to access higher-skilled employment.
- **Promote language acquisition and social integration:** Invest in widespread, accessible comprehensive language training programs that are targeted to the specific needs of Ukrainian refugees. Design and implement social integration initiatives to address language barriers, combat prejudice and negative stereotypes, and facilitate participation in community life. Particular language courses and integration programs should be established for elderly refugees.

4. Strengthen international collaboration and data collection:

- **Address gaps in monitoring and tracking:** Establish robust monitoring systems to track vulnerable groups' movements across borders and within host countries, identifying those at increased risk of exploitation and trafficking. This includes focusing on unaccompanied minors and addressing the unique challenges faced by separated children.

5. Combat negative stereotypes and gender-based violence:

- **Implement public awareness campaigns:** Launch targeted campaigns to combat negative stereotypes about Ukrainian refugees, promote tolerance and understanding, and encourage reporting of exploitation and abuse. Conduct awareness raising campaigns by providing examples of the contribution of Ukrainian refugees to the socio-economic life of the host countries.
- **Address gender-based violence:** Strengthen support services for victims of gender-based violence, including domestic violence and sexual harassment. Ensure appropriate protection, access to specialised medical and psychological services, and legal recourse.

6. Empower Ukrainian refugees:

- **Support community-based initiatives:** Provide funding and technical assistance to community-led organisations and support networks that offer protection, education, and economic opportunities to Ukrainian refugees. Support networks for women are particularly vital.
- **Promote self-reliance:** Focus on enabling Ukrainian refugees to achieve economic self-sufficiency and community integration, with specially designed programmes for those wishing to access the labour market, or to start a business in the host countries. Dignita’s empowering “Women’s circles” can serve as a positive practice, which could be adapted and replicated. Provide mentorship and coaching programmes that address the special situation and needs of specific vulnerable groups such as Ukrainian women with large families, elderly people, and Ukrainian Roma women.

Implementing these policy recommendations requires a multi-faceted, collaborative approach, engaging governments, international organisations, civil society groups, and local communities. Continued vigilance and adaptability are crucial as the situation evolves, ensuring that the most vulnerable individuals receive appropriate support and protection from trafficking for labour exploitation.

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