



## **Chapter 4. Recognising labour exploitation among Ukrainian refugees**

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## 4. Recognising labour exploitation among Ukrainian refugees

### 4.1 Introduction

The devastating war in Ukraine has triggered one of the largest refugee crises in recent European history. Millions have fled their homes seeking safety and security, resulting in a complex and evolving humanitarian situation. This mass displacement creates a significantly heightened risk of human trafficking, especially labour exploitation, targeting particularly vulnerable populations. Criminals exploit the desperation and precarious circumstances faced by refugees, preying on their limited resources, language barriers, and unfamiliarity with the host country's laws and social structures. This exploitation manifests in various forms, from wage theft and unsafe working conditions to forced labour and outright trafficking.

This training chapter is developed on the basis of thorough empirical research, conducted as part of the Eradicating II project on the vulnerabilities to labour trafficking of the Ukrainian refugees to trafficking for labour exploitation. The report identified particular risk factors, vulnerable groups and exploitative practices in six European countries: Bulgaria, Romania, Poland, Germany, Slovenia, and Greece. This chapter, which feeds from the findings of the report, is crucial for equipping you, as labour inspectors, law enforcement officers, social workers, and frontline officials, with the knowledge and skills to effectively identify, respond to, and prevent labour trafficking among Ukrainian refugees. Understanding the specific vulnerabilities of this population, the prevalent forms of exploitation, and effective intervention strategies are critical for protecting



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victims and ensuring accountability. This chapter will equip you with a framework for identifying victims, providing support, and coordinating with relevant agencies. We will examine real-world scenarios and discuss ethical considerations to ensure you can approach these complex cases with confidence and sensitivity. The success of our collective efforts depends on a thorough understanding of this crucial issue and effective collaboration among all stakeholders.

## 4.2 Learning objectives

Upon completing this chapter, participants will be able to:

- Define labour trafficking and related terms.
- Identify key vulnerability factors among Ukrainian refugees.
- Recognize indicators of labour trafficking in various sectors.
- Describe appropriate methods for identifying and supporting victims.
- Outline procedures for reporting suspected cases and accessing available resources.
- Implement effective strategies for victim protection and assistance.

## 4.3 Definitions

### Trafficking in Persons:

The recruitment, transportation, transfer, harbouring, or reception of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability, or of the giving or





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receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

### **Exploitation:**

Includes, at minimum, exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude, or the exploitation of criminal activities.

### **Forced Labor:**

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.

### **Labour Exploitation:**

The taking of unfair advantage of another person's vulnerability or state of need, often involving coercion, and a combination of labour law and criminal law violations.<sup>92</sup>

## **4.4 Theoretical / informative part**

This section provides a comprehensive overview of labour trafficking among Ukrainian refugees, focusing on vulnerability factors, prevalent forms of exploitation, and key indicators.

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<sup>92</sup> Preventing and combating trafficking in human beings for the purpose of labour exploitation - Recommendation CM/Rec(2022)21 (2023)





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## 4.4.1 Understanding vulnerability

Vulnerability encompasses different factors: personal, situational and contextual, which interact and may increase the risk of trafficking for certain individuals, groups and/or communities<sup>93</sup>. Thus, the concept of vulnerability can be understood to mean that some people are more susceptible to harm, relative to others, as a result of exposure to some form of risk.

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 combined with other factors increasing 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

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<sup>93</sup> (ICAT, 2022:2–3)



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groups. All these factors interact to make certain individuals, groups, or communities more susceptible to harm, including trafficking.<sup>94</sup>

The following personal, situational and contextual factors increase the risk of trafficking of Ukrainian refugees in particular.

- **Personal Factors:** These personal characteristics point out to the most vulnerable groups to trafficking for labour exploitation among the Ukrainian refugees. Understanding these personal factors would help us pay specific attention when coming into contact with a representative of these groups and looking out for additional contextual and situational factors.
  - **Single Mothers with Large Families:** These women often face significant financial pressure and limited support networks, making them particularly vulnerable to exploitative work arrangements.
  - **Roma Women:** Roma women refugees often experience systemic discrimination and marginalization in host countries, limiting access to services and resources and increasing their vulnerability to exploitation. Some Roma women lack IDs and sufficient proof of Ukrainian nationality, which further limits their access to support services and pushes them into marginalization and desperate subsistence strategies.

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<sup>94</sup> IOM, IOM HUMAN TRAFFICKING IN THE UKRAINE CRISIS **REGIONAL ANTI-TRAFFICKING TASK FORCE - MARCH 2023**



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- **Elderly People:** Limited mobility, access to resources, and dependence on others for basic needs make elderly refugees particularly vulnerable to abuse and exploitation.
- **People with Disabilities:** People with disabilities face similar challenges in accessing services and resources. Lack of sufficient health insurance in host countries, lack of suitable facilities and form of support make them especially vulnerable to isolation and exploitative practices.
- **Unaccompanied Minors:** These children are especially vulnerable to all forms of exploitation, including labour trafficking and sexual exploitation.
- **Situational Factors:** Temporary circumstances can exacerbate existing vulnerabilities or create new ones.
  - **Financial Pressure:** Economic hardship and the need to support oneself and family members significantly increase the risk of accepting exploitative work.
  - **Limited Access to Decent Work:** Language barriers, non-recognition of qualifications, and discrimination in the job market restrict access to decent work and increase vulnerability. Instance of discriminatory practices on behalf of employers have been documented.
  - **Difficulties Accessing Information:** Lack of awareness of legal rights and available support services, due to language barriers or other constraints, makes it hard for refugees to seek help.
  - **Insecure or Substandard Housing:** Instances of abuse of Ukrainian women refugees on behalf of citizens providing accommodation have been documenting. Unsafe living conditions or relying on employer to provide





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housing are also reported risk factors related to accommodation. Fear of losing accommodation, discrimination on the housing market due to nationality and the temporary condition of residence further exacerbate the situation of Ukrainian women refugees, and especially those taking care of children and elderly.

- Dependence on employer-provided housing or unsafe living conditions in collective centres places individuals at higher risk of exploitation and abuse.
- **Challenges Accessing Temporary Protection:** Bureaucratic hurdles and legal status challenges disproportionately affect non-Ukrainian third-country nationals (TCNs) and Ukrainian Roma.
- **Contextual Factors:** Broader societal factors and political environments significantly influence the vulnerability of Ukrainian refugees.
  - **Negative Stereotypes:** Gender-based stereotypes and negative perceptions of Ukrainians in host countries can lead to isolation, discrimination, and reluctance to report abuse, especially sexual abuse.
  - **Weak Enforcement of Labour Laws:** Ineffective enforcement of labour laws creates an environment where exploitation thrives.
  - **Inadequate Monitoring of Private Accommodation:** Private hosting schemes, while often well-intentioned, can present risks if not properly monitored, leading to exploitation and abuse.
  - **Gender-Based Violence:** Gender-based violence, fuelled by negative stereotypes and societal norms, significantly increases vulnerability to exploitation. This violence can occur in host communities. Domestic





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violence has also been recorded in cases of Ukrainian women travelling back home to visit family and relatives, increasing stress, trauma and undermining further resilience to abuse, human rights violations and exploitation.

#### 4.4.2 Exploitative practices

The following practices, derived from the empirical research and analytic report on vulnerability to trafficking for labour exploitation among the Ukrainian refugees, are crucial for identifying labour exploitation. Remember that practices often overlap in a single working relation, indicating different aspects of labour exploitation.

##### **Wage Theft and Excessive Working Hours:**

- **Underpayment:** Wages consistently below the legal minimum wage or agreed-upon salary.
- **Delayed Payment:** Significant delays in payments or non-payment of wages, sometimes using false promises.
- **Excessive Hours:** Working hours significantly exceeding legal limits or contractually agreed hours without additional compensation.
- **Unpaid Overtime:** Working extra hours without payment.

To add a human voice of these exploitative practices, quotations from service providers as well as from Ukrainian refugees are provided in italic.

*'And also, 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*





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*some Ukrainians that accepted to work without a labour contract and their negotiation was for eight hours a four, but they are working 12 hours for the same salary, at least one day’<sup>95</sup>*

*‘It was an online market...They've been exploited in an industrial space where they've been encouraged 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, also they 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 recruiting 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’*

- **Employment Through Intermediaries:**

- **Recruitment Agencies with Suspicious Practices:** Agencies that may prioritize profit over worker well-being; may not disclose full details of

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<sup>95</sup> Quotations from the report ‘Vulnerability to human trafficking for labour exploitation among the Ukrainian refugees’, under Eradicating II project.



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working conditions. Look for cases where Ukrainian nationals manage these agencies.

- **Substandard Conditions:** Work involving unsafe, unsanitary, or otherwise unacceptable working conditions.

*'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.'*

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

- **Discriminatory Practices:**

- **Unequal Treatment:** Ukrainian refugees are treated differently from colleagues (e.g., lower pay for the same work, fewer opportunities for promotion).
- **Negative Attitudes:** Employers and co-workers exhibit prejudice, discrimination or hostile behaviour towards Ukrainian refugees.

*'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*



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*making the Bulgarians work faster, and they were making us Ukrainians work faster. That was offensive to me.'*

- **Lack of Formal Contracts or Unclear Contractual Arrangements:**

- **Verbal Agreements:** Work based on informal, verbal agreements, lacking clear details of wages, hours, or other essential terms.
- **Missing Key Contractual Elements:** Contracts that lack details about salary, hours, benefits, or other rights.

- **Work in High-Risk Sectors:**

- **Agriculture:** Low pay, long hours, and poor working conditions in agricultural settings. Be aware of seasonal work patterns in this sector.
- **Hospitality and Tourism:** Pay often below the minimum wage, long hours, and poor conditions; especially prevalent in seasonal work, particularly in isolated locations.
- **Manufacturing:** Often unregulated, with unsafe conditions, long hours, low pay, and lack of contracts.

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

- **Exploitation for Criminal Activities:**

- **Sham Marriages or Forced Prostitution:** Advertisements or job offers that appear legitimate but may lead to forced marriage, prostitution, or other



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forms of sexual exploitation. Be alert for recruitment to work in nightclubs or other high-risk establishments.

- **Smuggling or Human Trafficking:** Recruitment of Ukrainian refugees with fake job ads for VIP transport have been documented, whereas these were potential case of trafficking for illegal activities like people smuggling.

### 4.4.3 Recognizing indicators of labour trafficking

Identifying labour trafficking requires a keen awareness of various warning signs. Here are some key indicators:

- **Recruitment:** Suspicious recruitment practices, including promises of high-paying jobs that are too good to be true or recruitment through informal channels.
- **Work Conditions:** Poor working conditions, long hours, low pay, unsafe environments, debt bondage, and restrictions on movement or communication.
- **Vulnerable Individuals:** Focusing on individuals or groups known to be particularly vulnerable, such as those listed in the 'Vulnerability Factors' section above.
- **Isolation:** Isolating victims from family and friends, controlling their movement and communication.
- **Control:** Employers who exert undue control over workers' lives, including confiscating documents, controlling their finances, and restricting access to information.

By thoroughly understanding these vulnerability factors, prevalent forms of exploitation, and key indicators, you will be better equipped to effectively identify and





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address labour trafficking among Ukrainian refugees. The next section outlines practical steps you can take to identify suspected cases, protect victims, and provide appropriate assistance.



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## 4.5 Suggested activity for the chapter

Table 8. Case study group discussion

Activity Name	Case study group discussion
Type of Activity	Case study analysis
Duration	60 minutes
Learning Objectives	Participants will be able to analyse realistic scenarios, identify indicators of labour trafficking, and propose appropriate responses.
Materials Needed	Result 3
Guidelines for the facilitator	<ul style="list-style-type: none"> <li>• Divide participants into small groups (3-4 people).</li> <li>• Provide each group with one case study describing situations that might involve labour trafficking (see Handouts section).</li> <li>• Ask groups to analyse the case studies, identifying a) recruitment and b) control mechanisms, c) exploitative</li> </ul>



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	<p>practices d) indicators of labour trafficking c) potential vulnerabilities of the victim(s).</p> <ul style="list-style-type: none"> <li>• Guide groups to develop strategies for identifying and supporting victims and reporting suspected cases.</li> </ul>
<b>Debriefing</b>	<ul style="list-style-type: none"> <li>• Facilitate a group discussion, summarizing findings and sharing best practices.</li> <li>• Highlight common challenges and ambiguities in recognizing labour trafficking.</li> <li>• Discuss the importance of inter-agency collaboration.</li> </ul>
<b>Tips for facilitator</b>	<ul style="list-style-type: none"> <li>• Use open-ended questions to encourage active participation.</li> <li>• Create a supportive environment where participants feel comfortable sharing their ideas.</li> <li>• Emphasize the complexity of labour trafficking and the importance of ethical considerations in interventions</li> </ul>
<b>Handouts</b>	e.g. cases studies that should be printed and provided to participants
<b>Variations for online implementation</b>	For an online implementation, divide the participants in separate virtual rooms, with one facilitator in each room. Upon completion, report in the plenary session.





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References	IOM, UNHCR, OSCE
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## CASE STUDY & GROUP DISCUSSION

Study Scenarios for Trafficking for Labour Exploitation Involving Ukrainian Refugees

### Case Study 1: Hotel Chain (Tourism Sector)

In a popular tourist city, a well-known hotel chain is seeking to expand its workforce due to increasing tourist numbers. The management is aware of the local demand but struggles to find sufficient staff.

A recruitment agency, claiming to help Ukrainian refugees find employment, connects with individuals through social media platforms and refugee support groups. They promise well-paying jobs in the hotel sector with accommodation and meals provided. Offers are made in Ukrainian, making the communication seem more legitimate and appealing.

Once recruited, the workers are flown to the city and find themselves in a rundown housing facility instead of the promised accommodations. Their passports are taken 'for safekeeping' by the recruitment agency. They're also required to sign contracts written in a language they barely understand that include excessive fees for transportation, meals, and accommodation, which further enslaves them.



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Workers are coerced into working long hours, often exceeding 12 hours a day, with little to no compensation beyond the advanced payments owed for their recruitment fees. They do not receive the promised wages, and threats of reporting them to authorities or deportation are used to maintain control.

## Case Study 2: Agricultural Sector

In a rural area, local farmers face a labour shortage due to seasonal demands. Exploitation networks emerge, approaching Ukrainian refugees who are looking for work.

A local farmer contacts a self-proclaimed NGO that offers jobs to refugees. The NGO promotes itself as helping to integrate refugees into the community. They lure potential workers with promises of high wages and a secure living environment.





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Upon arrival, the workers find they must stay in squalid conditions on the farm, where they are instructed that deductions will be made from their wages for rent, food, and transportation. The employer keeps tight control over the workers' hours and movement, often requiring them to remain on the farm at all times.

The workers endure harsh conditions, facing threats of violence or reporting to authorities for working without documentation. Pay is often withheld or reduced due to fabricated deductions, leaving workers in a cycle of debt to the employer.

### Case Study 3: Domestic Care

A family in a major city hires a domestic worker, needing assistance for elderly family members. They seek to hire someone who can speak Ukrainian to help with communication.

The family contacts an agency that presents itself as a legitimate caregiver recruitment service specializing in refugee workers. They advertise a compassionate environment and good pay.

The worker arrives to find their living conditions inadequate, often forced to sleep in a storage area of the apartment. The family requires the caregiver to be on-call 24/7, using emotional manipulation – sometimes claiming that the elderly relatives 'need them more than anything.'

Though initially promised a salary, the domestic worker is only given a small percentage of what was agreed upon, with excuses that additional costs for housing and



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food need to be factored in. The caregiver has no means to leave the situation due to emotional dependencies and threats of abandonment from the family.

## 4.6 Reflections

- What are the most important insights you gained from this training and how will they impact your work?
- How has the training deepened your understanding of risk factors of labour exploitation among the Ukrainian refugees?
- What challenges do you anticipate in applying the practices discussed and how can you address them?
- How can inter-agency collaboration improve in identifying labour trafficking victims?
- Which tools or strategies from the training do you find most valuable and how will you use them in your day-to-day responsibilities?