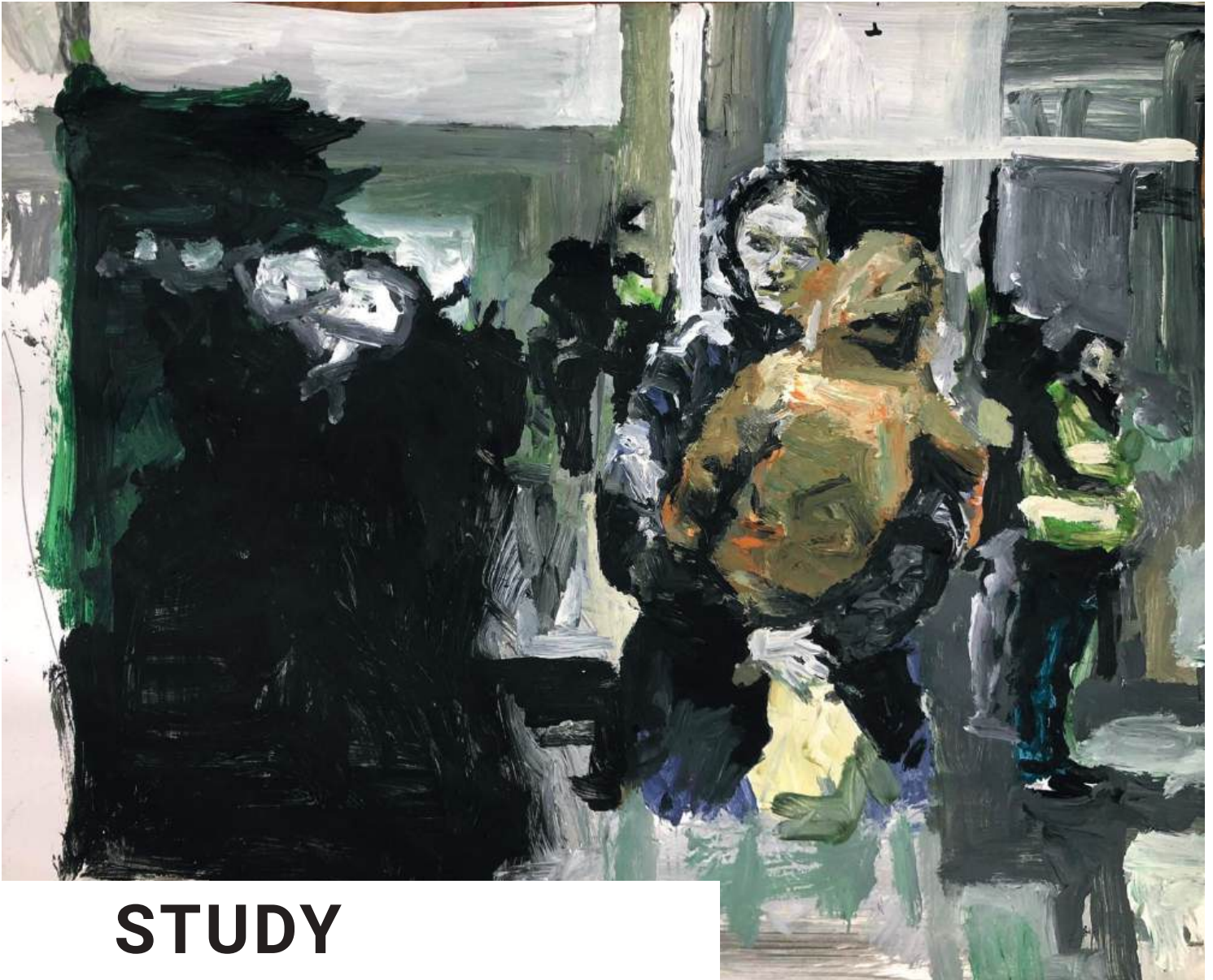




**United Nations**  
Office on Drugs and Crime



## **STUDY**

on Trafficking in Persons  
and Smuggling of Migrants  
in the Context of the Displacement  
caused by the War in Ukraine



**United Nations**  
**Office on Drugs and Crime**

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## Executive Summary

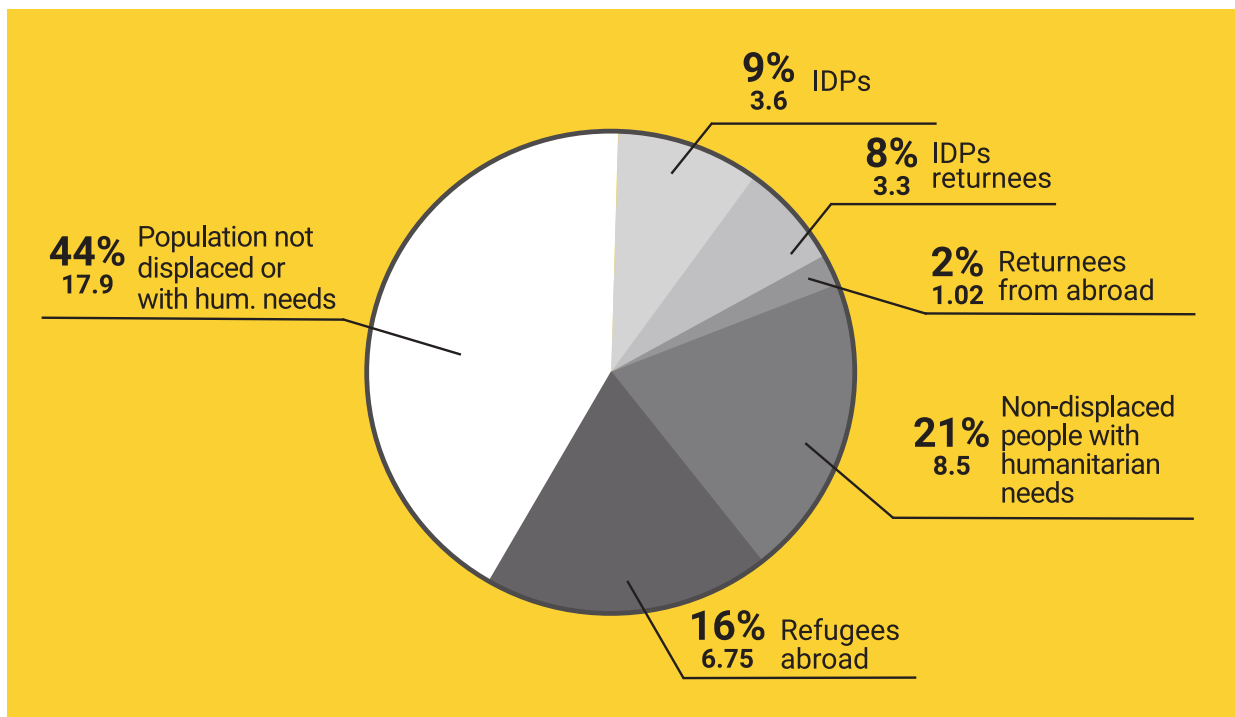
### Refugees from Ukraine

The full-scale invasion of Ukraine, beginning on 24 February 2022, and the ongoing war, have resulted in millions of people being displaced internally and outside Ukraine. This study examines the risks and incidence of trafficking in persons and smuggling of migrants in the context of the displacement caused by the conflict in Ukraine, and the implications for policy and practice.

The research applies a phased, mixed-methods approach to analyse the evolution of trafficking in persons and smuggling of migrants during the years 2022 to 2024. The study combines the collection and review of relevant literature, statistics, data and information with a survey in 2023 of over 1,600 Ukrainians and non-Ukrainians displaced from Ukraine and two phases of in-depth interviews in 2023 and 2024 with key informants and refugees in three European capital cities hosting refugees from Ukraine: Berlin, Germany; Warsaw, Poland; and Bern, Switzerland. Interviews were also conducted in 2023 and 2024 with key informants in Ukraine and at regional level.

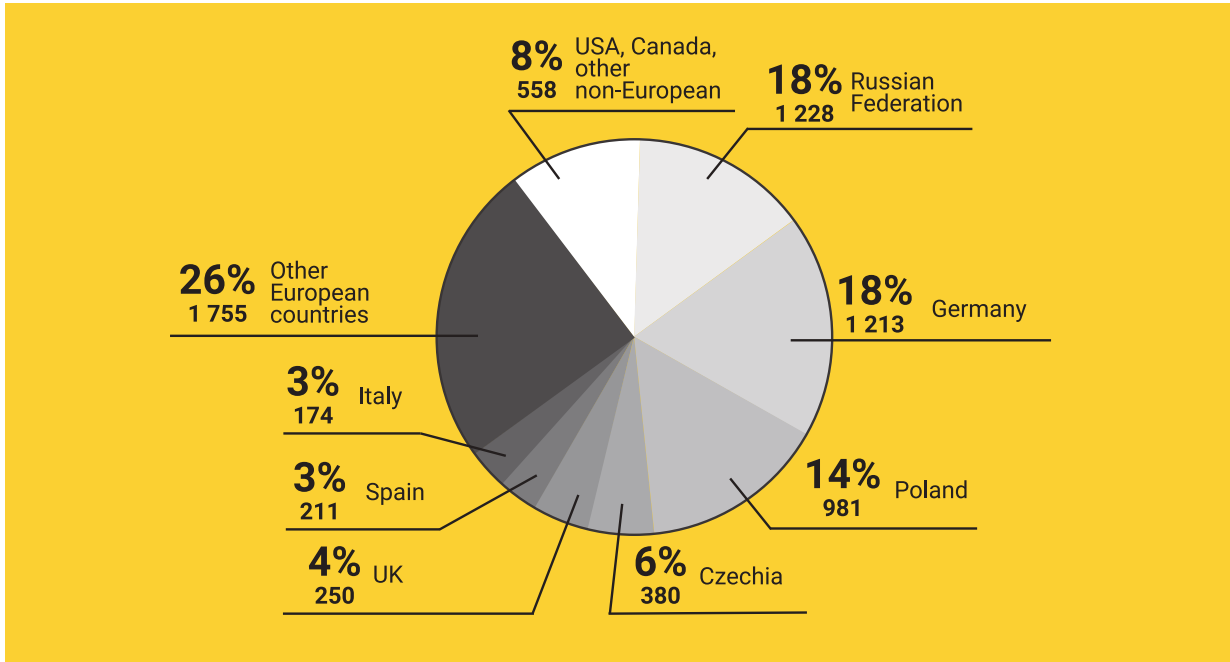
The population in Ukraine in February 2022 was just over 41 million people. As of October 2024, around 34 million people were living in Ukraine, including 3.6 million people who were internally displaced, 3.3 million who were returnees from other parts of Ukraine and one million who were returnees from abroad.

Ukrainian population  
(in millions) as of October 2024



Source: UNODC calculations based on data from: State Statistics Service Ukraine, International Organization for Migration (IOM), UN Office for the Coordination of Humanitarian Affairs (OCHA), UN Refugee Agency (UNHCR)

## Countries of residence of refugees from Ukraine (in 1,000s) as of October 2024



Source: UNODC Calculations based on UNHCR data

More than 6.75 million people fled Ukraine to other countries, as of October 2024. Most refugees from Ukraine reside in the Russian Federation (1.23 million), Germany (1.21 million), Poland (981,000), North America and other countries outside Europe (560,000) and Czechia (380,000). Of over 4.16 million Ukrainians (98.3%) and non-Ukrainians (1.7%) with temporary protection status in the European Union (EU) as of August 2024, 45 per cent are adult women, 23 per cent are adult men, 17 per cent are boys and 15 per cent are girls. At least 16,670 separated and unaccompanied refugee children from Ukraine reside in the EU countries, Switzerland and Norway.

Meanwhile, the displacement situation is highly dynamic. Between February 2022 and October 2024, people - of all nationalities - crossed Ukraine's land borders into the country at least 37 million times, for various reasons. Some remained in Ukraine; others stayed for a short period before leaving the country again.

Ukrainian citizens can enter almost every country on the European continent visa-free. The Council of the EU activated the 2001 Temporary Protection Directive for people fleeing Ukraine on 4 March 2022. Temporary protection and similar national protection schemes apply to people fleeing Ukraine and arriving in EU and non-EU European countries. The rights attached to the status include access to the labour market, social housing, social welfare, healthcare, education for children and banking services.

The legal framework for refugees from Ukraine arriving in the EU is therefore distinct in very significant ways from the framework that applies to refugees, asylum applicants and migrants from other non-EU countries.

## Comprehensive anti-trafficking response

Due to the suddenness and scale of displacement from Ukraine, it took some time for transit and host countries to put in place a targeted and effective anti-trafficking response. Nevertheless, in the course of 2022 and beyond, anti-trafficking stakeholders from the NGO sector, local and state authorities, and regional and international organizations, mobilized a series of anti-trafficking policies and actions.

These included:

- **information dissemination** in Germany, Poland, Switzerland and other host and transit countries about risks, rights and support services in key locations like border crossings, railway stations and accommodation centres, and online, in multiple languages. Information was also generated and shared by displaced Ukrainians themselves, particularly on social media and messaging apps;
- **screening and registration systems** for volunteers assisting people fleeing Ukraine in transit and host countries;
- **monitoring of key locations** by police, NGOs and other authorities for risks of exploitation and trafficking, such as brothels, railway and bus stations, and accommodation centres, as well as websites and social media; and
- **strengthened law enforcement and criminal justice responses**, including enhanced identification of potential trafficking cases and specialized prosecutors' networks.

Still, refugees from Ukraine are vulnerable to trafficking in persons specifically in relation to income generation and accommodation. While the labour market integration of Ukrainian refugees in host countries is proceeding, there are some gaps. 46 per cent of survey respondents for this research stated that they were not earning any money at the time of the survey. When asked why not, 44 per cent of those not earning money stated that they could not find employment, and nine per cent that they were taking care of children at home.

Much of the labour market integration of Ukrainians is in low-skilled sectors, even for refugees with higher skill levels. This is largely due to lack of fluency in the local languages of host countries and challenges in recognition of qualifications obtained in Ukraine. The lack of sufficient provision for childcare and other caring responsibilities of working-age refugees is a further obstacle to employment.

Labour law violations and potential cases of exploitation experienced by refugees from Ukraine are linked to lack of contracts, sub-contracting and the use of labour intermediaries, as well as, in Poland, working under civil-law rather than labour-law contracts. Many exploitative situations arise also in the context of accommodation, especially when the employer provides the accommodation. Private hosting arrangements present risks of forced labour in domestic work, cleaning and agricultural work, and of sexual abuse and exploitation, due to the relationship of dependency of refugees on accommodation hosts.

Specific groups of people displaced from Ukraine are in a more vulnerable situation, including unaccompanied and separated children; people who were previously internally displaced in Ukraine; people who are unable to access temporary protection (because they are not eligible, or due to lack of information or incorrect information); and elderly people.

Some Ukrainian Roma people have been allocated segregated accommodation and may have reduced access to essential services. Refugees with disabilities experience challenges in accessing social welfare, healthcare, mobility aids, assistive technologies and other forms of support, as well as obstacles to having their disability status officially recognized. Among over one million non-Ukrainians from outside the EU who fled Ukraine, many experienced discrimination during the journey and in accessing rights and services in EU countries.



## Refugees' journeys

In late February 2022, hundreds of thousands of people began to flee Ukraine. They comprised mostly women, children and elderly men.

### Map of Ukraine



Source: UN Geospatial, October 2023

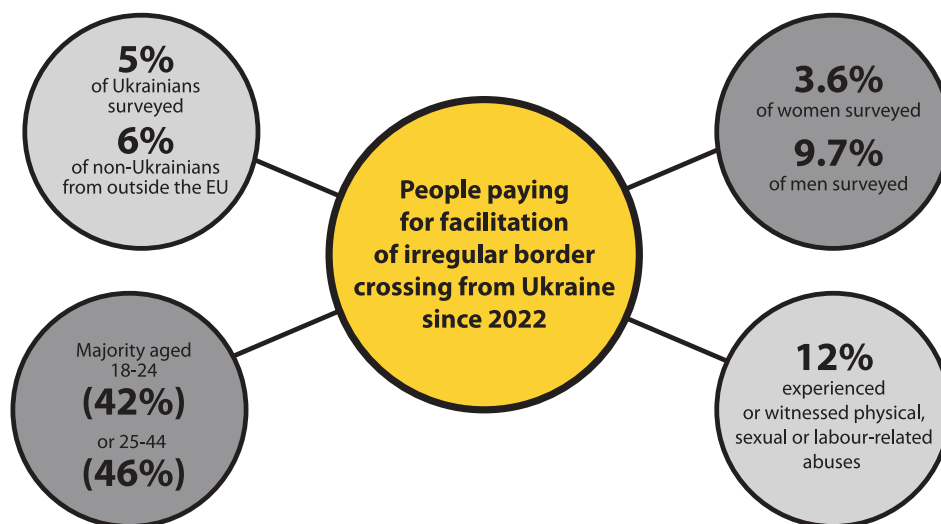
Refugees generally travelled distinct routes to exit the country, depending on where they were located in Ukraine. This is due to Ukraine's vast territory, as well as the difficulties and dangers of travelling within the country due to the conflict. People in west Ukraine generally crossed the western land borders, regularly entering Poland, Slovakia, Hungary or Romania, while those in the southwest and around Odesa crossed regularly into Moldova or Romania. People located in east and north Ukraine generally exited into Russia. They either remained there or transited through Russia to regularly enter Latvia, Estonia or Finland.

During the years prior to 2022, Ukrainians were among the top nationalities of people detected as irregularly residing, refused entry by land, and using fraudulent documents in the EU. During the period 2019-2022, the largest group by nationality of migrant smugglers detected at EU land borders was Ukrainian, comprising 11 per cent of the overall total over that three-year period, with an increasing trend.

Among 1,414 Ukrainian nationals surveyed for this research in Berlin, Warsaw and Bern in 2023, five per cent (70) answered "yes" to the survey question "did you pay for services to cross borders irregularly," though this includes 31 Ukrainian men, who may have exited Ukraine irregularly rather than irregularly entering another country.

Migrant smuggling according to international law is committed if someone facilitates irregular entry into another country or provides fraudulent travel documents for the purposes of irregular entry. Among 183 non-Ukrainians from outside the EU who fled Ukraine, six per cent reported paying for services to cross borders irregularly.

### Experiences of paying for facilitation of irregular border crossing among respondents surveyed in Germany, Poland and Switzerland in 2023



Source: Based on survey for this study of 1,602 people who fled Ukraine in 2023 in Berlin, Warsaw and Bern

Most of these people travelled by bus, train or private car – or a combination -, while one in six were driven in someone else’s car. Survey respondents who paid for facilitation of irregular border crossings were twice as likely as respondents who did not to have experienced or witnessed abuses, such as non-payment of wages or deception in the context of employment.

In response to the full-scale invasion, the Government of Ukraine declared martial law and general mobilization. This requires all male citizens of Ukraine aged 18-60 years to carry a military registration document and present it at the country’s borders at the request of the State Border Guard Service of Ukraine. These men are not permitted to leave Ukraine unless they qualify for an exemption. The majority of the 391 Ukrainian men surveyed for this research reported situations that suggest that they qualify for exemptions.

Nevertheless, a significantly higher percentage of men in the sample reported that they paid to irregularly cross borders (9.7%), compared to women (3.6%). Eighty-two percent of the men in this category were Ukrainian and almost all these Ukrainian men (30/31) were aged 18-60 years. Ukrainian men were eligible for conscription as of 27 years old at the time of the survey, though this was lowered to 25 in April 2024. Forty-five percent of the Ukrainian men who paid to cross borders were aged 27-60 years.

There are two main ways in which men who do not qualify for exemptions attempt to exit Ukraine, evading the domestic legal provisions prohibiting their departure. They either cross Ukraine’s borders and enter another country at an unofficial border crossing, or they use fraudulent or fraudulently obtained documents to qualify for an exemption. Irregular border crossings may involve assistance from migrant smugglers facilitating irregular entry, in return for payment.

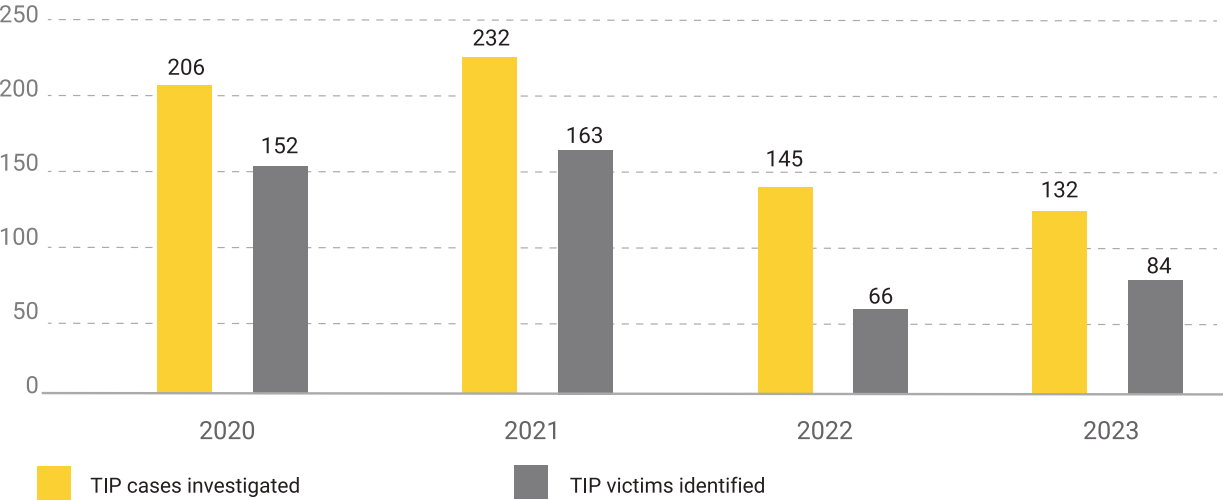
Over 24,000 Ukrainians, the majority adult men, were identified attempting to irregularly enter the EU at the 'Eastern Land Borders' during 2022-2024. The Ukrainian authorities intercepted over 11,000 Ukrainian men attempting to leave the country in violation of martial law between February 2022 and November 2023, either crossing borders irregularly (73%) or using fraudulent documents (27%). An unknown number of men in this category managed to exit Ukraine without being intercepted. At least 30 men died trying to exit Ukraine irregularly, mostly while attempting to cross the Tizsa river (at Ukraine's borders with Romania and Hungary). It is unclear what proportion of these crossings involved facilitation by a third party of irregular entry into another country in return for a financial or other material benefit, thus constituting smuggling of migrants.

The Ukrainian authorities have identified over 450 criminal groups involved in assisting men to irregularly exit Ukraine. Fees range between US\$2,000 and \$10,000, depending on the service provided and the country of destination. Facilitation of irregular exit involving fraudulent documents has also been detected, particularly related to medical exemption certificates authorizing men's departure from Ukraine. This costs around \$2,000-4,000, paid to corrupt officials or to travel facilitators.

### Trafficking in persons in Ukraine and abroad

Inside Ukraine, access to income generation, essential services and goods was substantially interrupted by the full-scale invasion and continues to be problematic, increasing people's vulnerability to internal and cross-border trafficking, especially internally displaced people (IDPs). However, in 2022 and 2023, the Ukrainian authorities identified fewer cases of trafficking in persons and fewer victims, due to reduced state capacity, as shown in the chart.

Trafficking in persons (TIP) cases and victims identified in Ukraine, 2020-2023

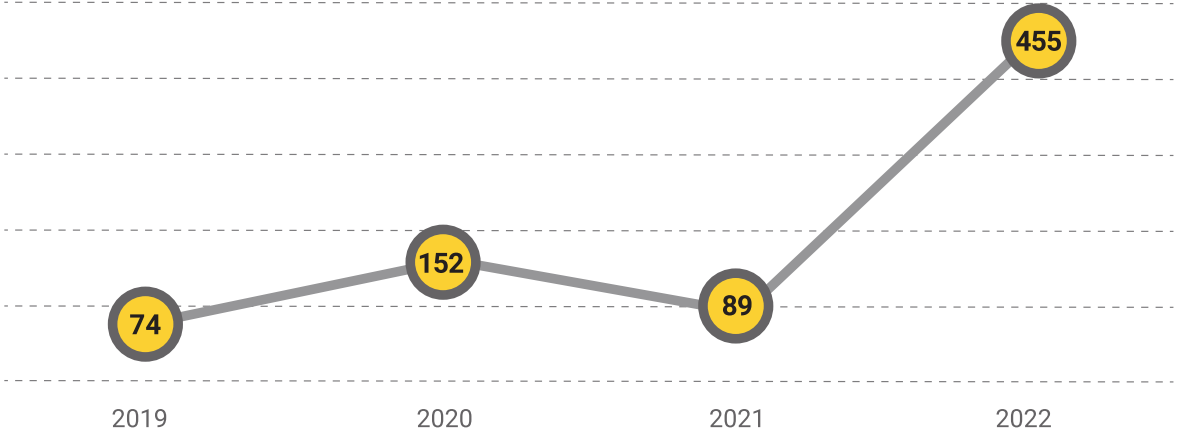


Source: Office of the Prosecutor General of Ukraine

The TIP offences investigated in Ukraine during 2022-2023 involved labour exploitation (49%); sexual exploitation (29%); forced criminal activities (21%); and exploitation in pornography (1%). This marked an increase in the proportion of cases of labour exploitation and forced criminal activities - and a decrease in the proportion of cases of sexual exploitation and exploitation in pornography. In 2020-2021, the forms of trafficking investigated were labour exploitation (38%); sexual exploitation (42%); forced criminal activities (13%); exploitation in pornography (6%), and other forms (less than 1%).

The cases of trafficking for forced criminality involve victims committing drug trafficking and migrant smuggling offences outside Ukraine, as a result of being trafficked. Overall, victims of trafficking identified in Ukraine during 2020-2023 comprise 43 per cent women, 37 per cent men and 20 per cent children. This includes the years 2020-2021, during which the COVID-19 pandemic significantly reduced capacities to identify victims globally. An additional 22 cases of child trafficking were identified during 2022-2023.

Ukrainian victims of trafficking identified globally, 2019-2022

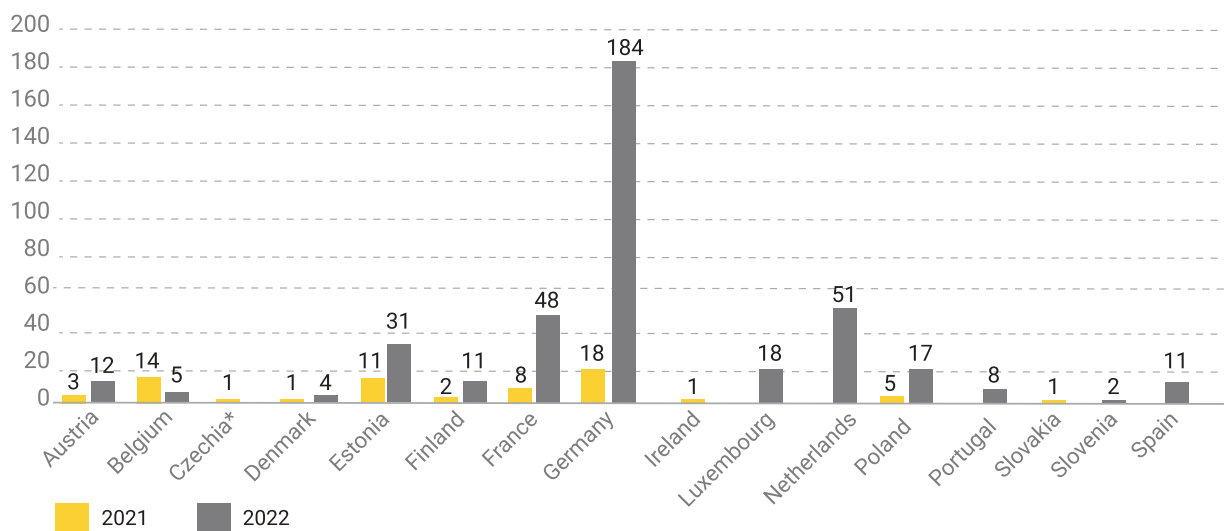


Source: UNODC elaboration based on national data – GLOTIP Database

Data on trafficking in persons cases provided to UNODC by countries hosting Ukrainian refugees indicate increases in Ukrainians identified as victims of trafficking during 2022, particularly in EU countries. During 2022, the first year of the large-scale displacement from Ukraine, 402 Ukrainian victims of trafficking were recorded across the EU Member States, comprising 206 women, 192 men and four people of unidentified gender. The majority of these victims are adults trafficked for forced labour. A further 33 Ukrainian victims were recorded in the UK in 2022. For comparison, 65 Ukrainian victims were identified in the EU in 2021, 38 in 2020 and 36 in 2019.

Based on a comprehensive analysis of the available primary and secondary sources included in this study, there has been an increase in identifications of cases of trafficking in persons involving refugees from Ukraine in EU countries. This increase occurred in a context where the population of Ukrainians residing in the EU more than tripled, from about 0.35 per cent of the entire EU population in 2021 to 1.24 per cent by the end of 2022.

### Number of Ukrainian victims of trafficking identified in the EU, 2021 vs. 2022



Source: UNODC elaboration based on national data – GLOTIP Database \*Figures for Czechia in 2022 not available

184 Ukrainians were recorded as victims of trafficking in 2022 in Germany, compared to 18 in 2021. However, at least 101 of these victims were trafficked prior to 2022. 17 Ukrainian adults were recorded as victims of trafficking for forced labour or services in Poland in 2022. The police in Switzerland reported two Ukrainian victims of trafficking in 2022.

After Germany, the highest number of Ukrainian victims recorded in any one country in 2022 was in the Netherlands. The number of Ukrainian victims recorded in the Netherlands increased from seven in 2021 to 51 in 2022. 49 of the cases in 2022 were labour exploitation. The victims comprise 33 women and 18 men exploited in agriculture, forestry and fishing, with smaller numbers in construction, industry and hospitality.

Among 1,602 people who fled Ukraine and were surveyed for this research in Berlin, Warsaw and Bern in 2023, two per cent experienced - or witnessed other people who fled Ukraine experiencing - abuses that would constitute indicators of potential cases of trafficking for forced labour. Most indications referred to situations witnessed rather than directly experienced by the respondents. The potential cases mainly involve non-payment of wages or where pay was less than promised; deception in relation to the type of work; excessive working hours or unsafe working conditions; and deception about who the employer was.

Based on triangulation and analysis of sources used for this study, the sectors most at risk for forced labour of Ukrainian refugees are domestic work, cleaning, care work, construction, manufacturing, agriculture, transportation and logistics and restaurants and hotels – some of them low-skilled sectors where predominantly women are employed.

Key informants interviewed for this research in 2023 and 2024 reported a relatively low incidence of situations of potential forced labour or labour trafficking. Nevertheless, they provided a wealth of information about labour law violations affecting people who fled Ukraine, making them more vulnerable to trafficking for forced labour. According to survey respondents and key informants, Ukrainian refugees are sometimes not paid for their work, there may be a significant delay in payment, they are paid less than national employees for the same work, and they may endure poor and hazardous working conditions.

There were indications in 2022 of a substantial increase in online demand from European men for sexual services and pornography from Ukrainian women - which may involve sexual abuse and exploitation - and for sexual abuse and exploitation of Ukrainian children. The risks of online sexual exploitation and abuse are acute, as many Ukrainians use messaging apps and social media to seek support and traffickers may recruit victims and advertise sexual services involving sexual exploitation online.

Some women who fled Ukraine are involved in sex work and prostitution in the three cities where field research was undertaken. Registered sex work is legal in all three cities, though it has been cantonal practice for the Bern authorities not to authorize it for people with temporary protection status. Indications of prostitution or sex work among refugees from Ukraine were mentioned by 2.5 per cent of respondents to the survey conducted for this research. It is difficult to determine whether this also involves trafficking for sexual exploitation and forced prostitution, but some cases present high levels of vulnerability. Risk factors for exploitation are evident in the situations of prostitution and sex work examined in this research, particularly at massage parlours and refugee accommodation centres. Some private accommodation providers also request transactional sex from vulnerable women.

The reported incidence of potential sexual exploitation and risky situations in the context of prostitution and sex work is lower than that of potential forced labour and labour rights violations among refugees from Ukraine. Seven survey respondents – 0.4 per cent - reported knowing of people in forced prostitution (potentially trafficking for sexual exploitation in prostitution), six of them in Warsaw. None of the 1,602 respondents to the survey reported personally experiencing sexual exploitation. However, this should be interpreted with caution as sexual exploitation is likely to be underreported in victimization surveys and in general.

While no children were interviewed or surveyed for this research, key informants mentioned indications of potential cases of child labour and child trafficking in agriculture, construction, begging and domestic work, in Ukraine and in host countries. There are also indications of cross-border trafficking for illegal adoption from Ukraine, including in the context of surrogacy, which is legal in Ukraine and has continued since February 2022.

## Outlook

The indications of a relatively low prevalence of trafficking in persons may be because cases have not yet come to the attention of the authorities. There are various possible reasons for this, including underreporting, challenges in detecting trafficking, lack of understanding of available legal frameworks and remedies among criminal justice sector actors, and the stigma attached to being a victim of trafficking. Some of these factors may be particularly relevant in the context of trafficking for sexual exploitation. Furthermore, most official data on trafficking in persons for 2023 and 2024 were not yet available at the time of writing. This underlines the urgency of continuing to monitor smuggling and trafficking affecting refugees from Ukraine, and trafficking of IDPs and others in Ukraine.

The low figures offer a tentative indication that the incidence of smuggling of migrants and trafficking in persons among refugees from Ukraine is limited. This suggests that visa-free travel and rapid access to temporary protection status, applicable in most European countries, together with extensive anti-trafficking measures in origin, transit and destination countries, have effectively mitigated the risks of smuggling and trafficking in this context.

Considering the concrete risks highlighted by the findings of this study, the continuation of the conflict and the large displaced population who continue to be affected, it is welcome that the legal and policy framework of visa-free travel, rapid access to temporary protection and robust anti-trafficking responses is being maintained. It could be further strengthened - particularly for vulnerable groups. These measures also show significant potential for adaptation and application to other refugee displacements and migration movements in Europe and elsewhere.

## 1. Introduction

The full-scale invasion of Ukraine, beginning in February 2022, and the ongoing war, resulted in the internal and cross-border displacement of millions of people from Ukraine. The ongoing conflict raises serious concerns about trafficking in persons inside the country; and about trafficking and migrant smuggling of people fleeing across borders. This study examines the risks and incidence of trafficking in persons and smuggling of migrants in the context of the displacement of people from Ukraine since 2022.<sup>1</sup>

Previous research by the United Nations Office on Drugs and Crime (UNODC) shows that vulnerabilities to trafficking in persons in a country experiencing armed conflict arise from: lack of opportunities for income generation; interruption in provision of essential services; issues with rule of law; internal displacement; and the risk of exploitation in the armed conflict itself. People living in conflict zones may adopt negative coping strategies to gain access to food and other supplies, or for their own safety and security.

Cross-border displacement of refugees often leads to an increase in smuggling of migrants and attendant vulnerabilities to trafficking in persons and other forms of abuse and exploitation during the journey. The legal and economic status of refugees in receiving countries is crucial in determining their longer-term resilience or vulnerability.<sup>2</sup>

To support key stakeholders in the region and beyond to effectively combat trafficking in persons and smuggling of migrants affecting people fleeing Ukraine and to protect the rights of trafficked and smuggled people, UNODC conducted an assessment of the incidence and risks of trafficking in persons and smuggling of migrants in the context of the displacement caused by the war in Ukraine.

The research applied a phased, mixed-methods approach to analyse the evolution of trafficking in persons and smuggling of migrants during the years since the beginning of the full-scale invasion and the resulting internal and cross-border displacement. Field research was conducted in three capital cities, two of which – Berlin and Warsaw – are among the most important host cities for Ukrainian refugees globally (see section 2.1 below). The approach combined the collection and review of relevant literature, statistics and data with the application of a survey and two phases of in-depth interviews with refugees and key informants, as set out in Table 1, culminating in the triangulation and analysis of the data and information obtained through these different methods. Further details on the methodology are included in the Methodological Annex.

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<sup>1</sup> An earlier Research Brief provided an overview of these potential risks: United Nations Office on Drugs and Crime (UNODC), *Conflict in Ukraine: Key Evidence on Risks of Trafficking in Persons and Smuggling of Migrants*, (updated December 2022).

<sup>2</sup> Previous research on this topic includes: UNODC, *Global Report on Trafficking in Persons 2018*, Booklet 2: Trafficking in Persons in the Context of Armed Conflict, (United Nations Publication, 2018); UNODC, *Countering Trafficking in Persons in Conflict Situations: Thematic Paper*, (2018); United Nations Human Rights Council, *Report of the Special Rapporteur on trafficking in persons, especially women and children*, A/76/263, (2021); UN HRC, *Report of the Special Rapporteur on violence against women, its causes and consequences*, A/HRC/32/42, (2016); Claire Healy, *The Strength to Carry On: Resilience and Vulnerability to Trafficking and Other Abuses among People Travelling along Migration Routes to Europe*, (Vienna, International Centre for Migration Policy Development (ICMPD), 2019); Claire Healy, *Targeting Vulnerabilities: The Impact of the Syrian War and Refugee Situation on Trafficking in Persons*, (Vienna, ICMPD, 2015).



Table 1: Field research overview

	Bern/CH	Berlin/DE	Warsaw/PL	Regional	Ukraine	Total
Ukrainian refugees surveyed in 2023	584	332	507	-	-	1414
Non-Ukrainians surveyed in 2023	9	78	102	-	-	188
<b>Total survey respondents</b>	<b>593</b>	<b>400</b>	<b>609</b>	<b>-</b>	<b>-</b>	<b>1602</b>
Key informants 2023	16	14	13	4	-	47
Key informants 2024	9	11	7	4	5	36
Refugees interviewed 2024	3	1	2	-	-	6
<b>Total interviewees</b>	<b>28</b>	<b>26</b>	<b>22</b>	<b>8</b>	<b>5</b>	<b>89</b>

While every effort was made to ensure that the research was as comprehensive, representative and objective as possible, some limitations should be noted. The survey respondents were selected non-probabilistically, as a convenience sample, which presents limitations in terms of the extent to which the analysis can be generalized to the entire refugee population. Due to the ethical and practical implications, no children (anyone aged under 18 years) were interviewed or surveyed. Around two-thirds of the population of adult refugees from Ukraine in the European Union (EU) are women, while around three-quarters of survey respondents were women, meaning that women are slightly over-represented in the survey sample.

The administrative and criminal justice data on trafficking in persons included and analysed in the study mainly refer to the year 2022. At the time of writing, data for 2023 and 2024 were not generally available. Indeed, some of the data reported for 2022 refer to trafficking cases that were identified prior to that year and therefore do not relate to the experience of people displaced by the full-scale invasion of Ukraine. This means that data for 2023-2024, as and when they become available, may show a different incidence of trafficking cases than is reflected in this analysis.

The scope of the research covers smuggling of migrants and trafficking in persons from Ukraine, and trafficking in persons inside Ukraine, in territories under the control of the Ukrainian Government. This UNODC study sets out research findings on: the scale and composition of displacement from Ukraine; the legal and policy measures that apply to refugees from Ukraine in receiving countries, including anti-trafficking measures; and indications of smuggling of migrants and of different forms of trafficking in persons. The study also includes in-depth case studies of potential trafficking in persons cases.

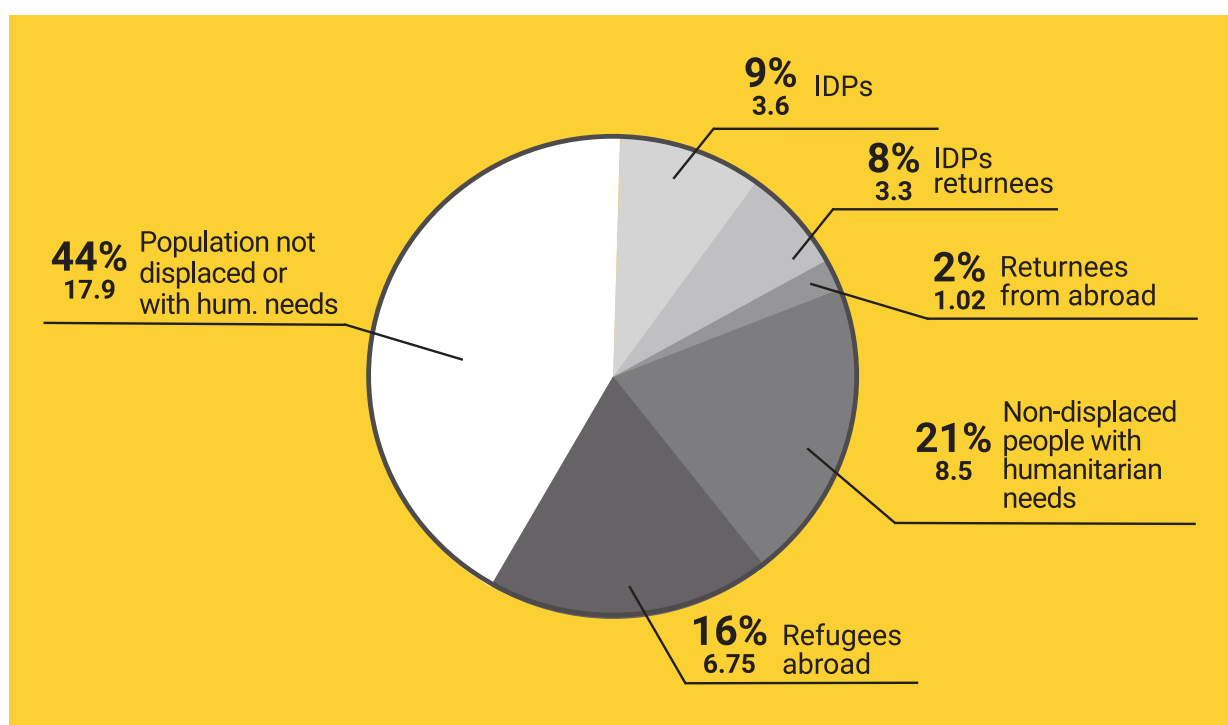
## 2. Forced Displacement Context

### 2.1 Scale and composition of the displacement

#### Inside Ukraine

In February 2022, the population of Ukraine was just over 41 million people.<sup>3</sup> As of October 2024, around 34 million people were living in Ukraine, including 3.6 million people who were internally displaced<sup>4</sup> and around 4.3 million returnees from other parts of Ukraine (76%) and abroad (24%).<sup>5</sup> UN agencies estimate that 14.6 million people in the country need humanitarian aid and protection assistance, of whom 8.5 million are non-displaced.<sup>6</sup>

Ukrainian population  
(in millions) as of October 2024



Source: UNODC calculations based on data from: State Statistics Service Ukraine, International Organization for Migration (IOM), UN Office for the Coordination of Humanitarian Affairs (OCHA), UN Refugee Agency (UNHCR)

<sup>3</sup> State Statistics Service of Ukraine, Number of Present Population of Ukraine, as of 1 January. "Excluding the temporarily occupied territories of the Autonomous Republic of Crimea, and the city of Sevastopol," (2022).

<sup>4</sup> International Organization for Migration (IOM) Displacement Tracking Matrix, "Ukraine – Internal Displacement Report – General Population Survey Round 18 (October 2024)", (October 2024).

<sup>5</sup> IOM Displacement Tracking Matrix, "Ukraine – Conditions of Report Assessment Factsheet – Round 8", (July 2024). IOM considers as returnees people who left their place of habitual residence after 24 February 2022, for a period of at least two weeks, and who since returned.

<sup>6</sup> United Nations Office for the Coordination of Humanitarian Affairs (OCHA), *Ukraine Humanitarian Needs and Response Plan 2024*, (January 2024); OCHA, "Ukraine: Situation Report": <https://reports.unocha.org/en/country/ukraine>, (accessed 6 November 2024).

The unemployment rate in Ukraine peaked after the full-scale invasion at 24.5 per cent in 2022 and is estimated at 14.2 per cent in 2024, as compared to 9.8 per cent in 2021.<sup>7</sup> As of early 2022, 2.7 million people with disabilities were living in Ukraine,<sup>8</sup> and during the course of 2022, an additional 130,000 people in Ukraine registered their disability status.<sup>9</sup>

## Dynamic cross-border displacement

As of October 2024, more than 6.75 million people have fled Ukraine to reside abroad since the beginning of the full-scale invasion, according to the UN Refugee Agency (UNHCR).<sup>10</sup> 6.2 million refugees from Ukraine are recorded in European countries and 560,000 in the USA, Canada and other non-European countries. More than one million non-Ukrainians from outside the EU have exited Ukraine since the outbreak of the war.<sup>11</sup>

People displaced from Ukraine reside in the Russian Federation (1.23 million),<sup>12</sup> 1.21 million in Germany, 981,000 in Poland, 560,000 in North America and other countries outside Europe, 380,000 in Czechia, 250,000 in the United Kingdom (UK), 211,000 in Spain and 174,000 in Italy.<sup>13</sup> All the above figures are as of October 2024. The UK is among the few European countries requiring entry visas from Ukrainians; as of October 2024, a total of 216,000 Ukraine Scheme visa holders had arrived in the UK.<sup>14</sup>

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<sup>7</sup> International Monetary Fund (IMF) DataMapper Ukraine: [www.imf.org/external/datamapper/LUR@WEO/UKR](http://www.imf.org/external/datamapper/LUR@WEO/UKR), (accessed 24 October 2024).

<sup>8</sup> United Nations Office of the High Commissioner for Human Rights (OHCHR), "Ukraine: 2.7 million people with disabilities at risk, UN committee warns", (14 April 2022).

<sup>9</sup> World Bank, Government of Ukraine, EU and UN, *Ukraine Rapid Damage and Needs Assessment February 2022 – February 2023*, (March 2023); Key informant interviews 2CH-K-01; UA-K-02.

<sup>10</sup> A study by the Ukrainian Centre for Economic Strategy puts the figure significantly lower, at a total of 4.9 million Ukrainian refugees as of January 2024, based on the statistics of the State Border Guard Service of Ukraine and the statistics on Ukrainians in Russia and Belarus. Source: Centre for Economic Strategy (CES), *Ukrainian refugees. Future abroad and plans to return*, (March 2024).

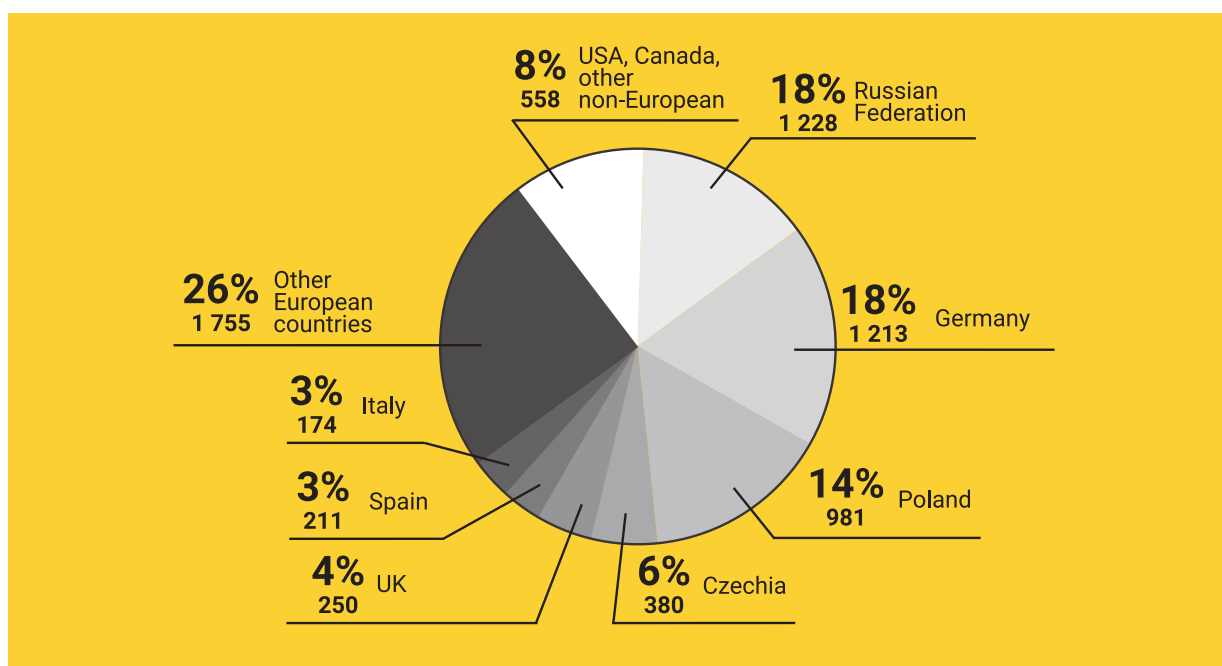
<sup>11</sup> IOM, *Ukraine and Neighbouring Countries 2022-2024: Two Years of Response*, (February 2024).

<sup>12</sup> Latest figures available for the Russian Federation are from 31 December 2023. Ukrainians can regularly enter the Russian Federation and apply for Refugee Status, Temporary Asylum, Temporary Residence Permit, Permanent Residence Permit or Russian citizenship. Non-Ukrainians fleeing the war can transit the Russian Federation regularly for up to 15 days. Source: UN Refugee Agency (UNHCR), "Russian Federation", [www.unhcr.org/countries/russian-federation](http://www.unhcr.org/countries/russian-federation), (accessed 6 November 2024).

<sup>13</sup> UNHCR Operational Data Portal, "Ukraine Refugee Situation", <https://data.unhcr.org/en/situations/ukraine>, (accessed 6 November 2024).

<sup>14</sup> UK Home Office, "Ukraine Family Scheme, Ukraine Sponsorship Scheme (Homes for Ukraine) and Ukraine Extension Scheme visa data", (28 October 2024). As of 28 October 2024, 58,500 people had arrived in the UK through the Ukraine Family Scheme (discontinued since February 2024) and 157,400 through the Ukraine Sponsorship Scheme. An additional 33,800 people had their permission to stay extended under the Ukraine Family Scheme and Ukraine Extension Scheme.

## Countries of residence of refugees from Ukraine (in 1,000s) as of October 2024



Source: UNODC Calculations based on UNHCR data

The cross-border displacement from Ukraine resulted in widespread family separation. Seventy-eight per cent of over 43,000 refugees from Ukraine interviewed by UNHCR in Ukraine's neighbouring countries in 2022 had to separate from at least one immediate family member in order to flee. This is because of martial law provisions prohibiting Ukrainian men aged 18-60 years from leaving the country (with some exemptions, see section 3.3 below) or because the family member(s) did not want to or could not leave Ukraine.<sup>16</sup> Family separation during the journey makes refugees vulnerable to different forms of trafficking and abuse.<sup>17</sup>

<sup>15</sup> According to UNHCR, these numbers refer to the: "total number of Refugees from Ukraine recorded across Europe/in country", reflecting the "estimated number of individual refugees who have fled Ukraine since 24 February and are currently present in European countries. Figures, including disaggregation by country, include refugees from Ukraine who were granted refugee status, temporary asylum status, temporary protection, or statuses through similar national protection schemes, as well as those recorded in the country under other forms of stay (from 24 February 2022), as relevant/applicable."

<sup>16</sup> UNHCR, "Ukraine situation: Regional protection profiling and monitoring factsheet", (21 December 2022).

<sup>17</sup> Frontex, *Risk Analysis for 2023/2024*, (Warsaw, 2023), p. 38.

Data on separated and unaccompanied children is available for 18 EU countries, Liechtenstein, Norway and Switzerland. The data indicate at least 16,670 separated and unaccompanied refugee children from Ukraine in these countries. Figures for Germany, Poland, Czechia, Spain, Italy and France, among others, are not included here, but the total includes 1,100 unaccompanied and separated refugee children granted temporary protection (Protection Status S) in Switzerland.<sup>18</sup> Gaps were identified in 2022 in the centralized registration of unaccompanied children; EU countries were not initially systematically reporting data on unaccompanied children fleeing Ukraine.<sup>19</sup>

Meanwhile, the displacement situation is highly dynamic. As of October 2024, people - of all nationalities - had crossed Ukraine's land borders into the country at least 37 million times, for reasons including temporary trips to check on family, property and businesses, joining family, accessing economic opportunities and perception of safety in specific areas.<sup>20</sup> Ukrainian refugees based in Poland in particular often travel back and forth regularly to Ukraine, or seasonally, remaining in Poland only for the winter months. This can have implications for their access to support and services in Poland.<sup>21</sup>

Around 1,030,000 people are considered by the International Organization for Migration (IOM) as returnees to Ukraine from abroad, as of October 2024.<sup>22</sup> Among respondents to the Survey of Arriving Migrants from Ukraine (SAM-UKR) conducted by the EU Asylum Agency (EUAA) and the Organisation for Economic Co-operation and Development (OECD) in 2023, 19 per cent of respondents planned to return to Ukraine as soon as it is safe, while 43 per cent did not intend to return.<sup>23</sup>

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<sup>18</sup> Statistical office of the European Union (Eurostat), "Temporary protection for persons fleeing Ukraine – monthly statistics", (3 October 2024), (accessed 6 November 2024).

<sup>19</sup> European Union Agency for Fundamental Rights (FRA), *Fundamental rights implications for the EU of the war in Ukraine*, (Luxembourg: Publications Office of the European Union, 2023).

<sup>20</sup> UNHCR, "Ukraine Refugee Situation", <https://data.unhcr.org/en/situations/ukraine>, (accessed 6 November 2024); UNHCR and REACH, *Situation Overview: Movement of Ukrainians back into Ukraine from Poland, Slovakia, Hungary, Romania and Moldova*, (28 April 2022); UNHCR, *Lives on Hold: Profiles and Intentions of Refugees from Ukraine*, (July 2022).

<sup>21</sup> Key informant interviews 2PL-K-03; 2PL-K-05; Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons in the context of the war in Ukraine: The case of Poland and Romania*, (2024).

<sup>22</sup> IOM Displacement Tracking Matrix, "Ukraine – Conditions of Report Assessment Factsheet – Round 8", (July 2024). IOM considers as returnees people who left their place of habitual residence after 24 February 2022, for a period of at least two weeks, and who since returned.

<sup>23</sup> Organisation for Economic Cooperation and Development (OECD) and European Union Agency for Asylum (EUAA), *Voices in Europe: Experiences, Hopes and Aspirations of Forcibly Displaced Persons from Ukraine*, (Paris, OECD Publishing, 2024).

During the course of 2023, some refugees moved on from the countries bordering Ukraine to other parts of Europe. Around 67 per cent of 3,418 people surveyed for the SAM-UKR in 2023, who were located in Germany, France, Ireland, Norway and Poland, had already reached their preferred destination country. The remainder were not yet at their final intended destination (13%) or were undecided (21%).<sup>24</sup>

The age and gender composition of the refugee population has also changed since the beginning of the displacement. The population of people with temporary protection in Europe as of August 2024 comprises 45 per cent adult women, 23 per cent adult men, 17 per cent boys and 15 per cent girls.<sup>25</sup> The proportion of adult men applying for temporary protection has gradually increased over the years since the beginning of the full-scale invasion.<sup>26</sup>

« *Now you see more and more men in Warsaw.  
At the beginning of the war, it was mainly women  
and children. Now you see more families.* »

Trafficking in Persons Specialist, NGO, Poland, 2024<sup>27</sup>

## 2.2 Legal and policy provisions

### Visa-free travel and rapid access to temporary protection status

Ukrainian citizens can enter the EU and all other European countries without requiring a visa, with the exception of the UK. Temporary protection and similar national protection schemes apply to people fleeing Ukraine and arriving in EU and non-EU European countries.<sup>28</sup> The Council of the EU activated the 2001 Temporary Protection Directive for people fleeing Ukraine on 4 March 2022 and, as of the time of writing, it has been extended until March 2026.<sup>29</sup>

<sup>24</sup> *Ibid.*

<sup>25</sup> Ukrainian men aged 18-60, and adult women with certain professions, are prohibited under Ukrainian martial law from leaving the country and taking up residence elsewhere, unless they qualify for exemptions.

<sup>26</sup> Statistical Office of the European Union (Eurostat), "Temporary protection for persons fleeing Ukraine – monthly statistics", (3 October 2024), (accessed on 6 November 2024).

<sup>27</sup> Key informant interview 2PL-K-01.

<sup>28</sup> All 27 EU Member States, Iceland, Liechtenstein, Montenegro, Norway, Serbia, Kosovo: S/RES/1244 (1999), Switzerland, UK and other European countries (e.g., Republic of Moldova, Georgia, Türkiye) grant temporary protection or similar national protection status.

<sup>29</sup> Council of the EU Implementing Decision (2022/382) to activate Article 5 of Council Directive 2001/55/EC of 20 July 2001, introducing temporary protection for Ukrainians arriving in EU countries, was taken on 4 March 2022. On the most recent extension of temporary protection, see: Council of the EU, "Ukrainian refugees: Council extends temporary protection until March 2026", press release, (25 June 2024).

**Temporary protection** is a form of protection status that is granted through a swift application procedure and is based on a person's country of origin or previous residence, rather than on an individual assessment of each person's application for refugee status in the mainstream asylum system. Applications for international protection in mainstream asylum systems are usually decided on a case-by-case basis and therefore generally take much longer to process.

The activation of the Temporary Protection Directive by the Council of the EU is *"an exceptional measure to provide immediate and temporary protection in the event of a mass influx or imminent mass influx of displaced persons from non-EU countries who are unable to return to their country of origin."*<sup>30</sup>

The EU 'Dublin Regulation,' which requires asylum applicants to apply for international protection in the first EU country they arrive in, does not apply to applicants for temporary protection. This means refugees from Ukraine can freely decide which EU country to apply for temporary protection in. The EU temporary protection residence permit is valid for one year and can be extended for up to three years. The rights attached to the status include access to the labour market, social housing, social welfare, healthcare, education for children and banking services.<sup>31</sup> People with temporary protection status can travel to and remain in other EU countries for up to 90 days within a 180-day period.<sup>32</sup>

«...the Temporary Protection Directive was a wonderful step in terms of preventing smuggling of migrants. Otherwise, we could have had a quite different scenario. [...] The activation of the Directive is something that should also be considered in broader contexts, beyond conflict and war.»

Key informants from an international organization, 2023<sup>33</sup>

The legal framework for refugees from Ukraine arriving in the EU and other European countries is therefore distinct in significant ways from the framework that applies to refugees, asylum applicants and migrants from other non-EU countries. Because it is possible to enter the country regularly and rapidly access temporary protection status, refugees from Ukraine generally do not need a smuggler to facilitate their journey to the country of refuge.

<sup>30</sup> European Commission, Migration and Home Affairs, "Temporary Protection", (accessed 6 November 2024).

<sup>31</sup> European Union Agency for Fundamental Rights (FRA), *The Russian war of aggression against Ukraine – the broad fundamental rights impact in the EU: Bulletin #2*, (Luxembourg, Publications Office of the European Union, 2022).

<sup>32</sup> *Ibid.*

<sup>33</sup> Key informant interview IN-K-02.

Key informants interviewed for this research specifically pointed to swift and legal migratory journeys, rapid granting of temporary protection status and access to the labour market as crucial sources of resilience to trafficking in persons and labour rights violations in general, as well as preventing smuggling of migrants. Legal status reduces the risks of refugees being exploited in informal employment and of irregular status being used by employers to threaten employees.<sup>34</sup>

## Temporary protection permits in Europe

4,163,700 people were granted temporary protection in the European Economic Area (EEA)<sup>35</sup> during the period March 2022 to August 2024. Over half were granted temporary protection in Germany (1,122,300) and Poland (975,200) - and 66,500 in Switzerland.<sup>36</sup> They comprise Ukrainians (98.3%), Russians (0.3%), Nigerians (0.12%), Azerbaijanis (0.10%) and other non-EU citizens. At 34.6 per 1,000 population, Czechia hosts the highest number of people under temporary protection per capita, followed by Lithuania and Poland, both hosting over 26 per 1,000 population.<sup>37</sup>

Few Ukrainians have applied for international protection through the regular asylum systems of European countries. In the EEA, 409,500 people of all nationalities were granted some form of refugee status or subsidiary protection (not including temporary protection) in 2023. This includes 10,340 Ukrainians - three per cent of the total granted international protection in the EEA in that year.<sup>38</sup> This means that the vast majority – 99.5 per cent - of Ukrainians in Europe applied for temporary protection status rather than international protection.

The majority (83%) of the 1,602 survey respondents for this research in Germany, Poland and Switzerland had temporary protection status (or the equivalent in Switzerland – Protection Status S) at the time of the survey, while 11 per cent had refugee status or had applied for asylum. A higher proportion of men surveyed (16%) had refugee status or had applied for asylum than women (9%). In Switzerland, 98 per cent of respondents had Protection Status S, while in Germany, 82 per cent of respondents had EU temporary protection status and 12 per cent were refugees or asylum applicants. In Poland, 70 per cent of respondents had temporary protection status, while 20 per cent were asylum applicants or refugees.

Non-Ukrainian citizens from outside the EU who were residing in Ukraine at the outbreak of the war are not necessarily granted visa-free entry to countries of refuge. In certain cases, however, including for entry into Germany, a visa is not required for non-Ukrainians, as long as the person in question can prove that they were residing in Ukraine when the full-scale invasion began.<sup>39</sup> Temporary protection is generally granted to recognized refugees and some categories of long-term permanent residents who had been residing in Ukraine.

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<sup>34</sup> Key informant interviews 1DE-K-02; 1DE-K-07; 1DE-K-09; 1DE-K-09; 2DE-K-02; 1PL-K-01; 1PL-K-04; 2CH-K-07.

<sup>35</sup> The European Economic Area (EEA) comprises all EU Member States, Iceland, Liechtenstein and Norway.

<sup>36</sup> Eurostat, "Temporary protection for persons fleeing Ukraine – monthly statistics", 3 October 2024 (accessed on 6 November 2024).

<sup>37</sup> *Ibid.*

<sup>38</sup> EUROSTAT, "Asylum decisions – annual statistics", 4 July 2024 (accessed on 5 August 2024).

<sup>39</sup> See: Germany, Ukraine Residence Transitional Regulation of 7 March 2022 (BAnz AT 08.03.2022 V1), most recently amended by Article 1 of the Regulation of 17 May 2024 (BGBl. 2024 I Nr. 168).



Among the 188 non-Ukrainian people surveyed for this research, most (93.5%) had some form of regular status in Ukraine before they left – visa-free entry or a residence, employment or study permit, including 16.5 per cent who had applied for asylum in Ukraine. Just six per cent stated that they were undocumented or did not know.

## 2.3 Anti-trafficking measures

### Mobilizing the anti-trafficking response

As set out in the previous section, key informants for this research identified visa-free travel and rapid access to temporary protection status as crucial policy tools to prevent trafficking in persons and related vulnerabilities, as well as to prevent smuggling of migrants.<sup>40</sup> This is supported by emerging research on the risks of trafficking for people displaced from Ukraine.<sup>41</sup> In addition, a comprehensive anti-trafficking response was put in place by Ukrainian and host country authorities and civil society actors. According to a study by the UN's Regional Anti-Trafficking Task Force for Ukraine in early 2023: *"While data and research is limited, it is likely that the swift and large-scale response prevented widespread vulnerability to trafficking in persons."*<sup>42</sup>

The EU Common Anti-Trafficking Plan to respond to the Ukrainian displacement crisis, adopted in May 2022, considered the threat of trafficking in persons *"high and imminent."*<sup>43</sup> Due to the suddenness and scale of the displacement from Ukraine, it took some time for a targeted and effective anti-trafficking response to be put in place. Gradually, in the course of 2022 and beyond, anti-trafficking stakeholders from NGOs, local and state authorities, and regional and international organizations, mobilized a series of anti-trafficking policies and actions. Across the EU, this includes information campaigns, specialized prosecutors' networks, enhanced identification of potential trafficking cases, law enforcement and criminal justice responses, and targeting of criminals victimizing Ukrainian refugees on online platforms.<sup>44</sup>

Private companies and state authorities in the countries under study put in place information dissemination initiatives to encourage formal and safe employment, including employment information and job search websites specifically for people from Ukraine.<sup>45</sup> National and local authorities, in partnership with NGOs, set up a comprehensive system of information dissemination in multiple languages (Ukrainian, Russian, English) on risks of trafficking, rights and support services.

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<sup>40</sup> Key informant interviews 1DE-K-02; 1DE-K-07; 1DE-K-08; 1DE-K-09; 2DE-K-02; 1PL-K-01; 1PL-K-04; 2CH-K-07; IN-K-02.

<sup>41</sup> See, inter alia: OECD & EUAA, *Voices in Europe: Experiences, Hopes and Aspirations of Forcibly Displaced Persons from Ukraine*, (Paris, OECD Publishing, 2024); Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons in the context of the war in Ukraine*, (2024); IOM, *Human Trafficking in the Ukraine Crisis: Regional Anti-Trafficking Task Force – March 2023*; UNODC, *Conflict in Ukraine: Key Evidence on Risks of Trafficking in Persons and Smuggling of Migrants*, (updated December 2022); UNHCR, *Surviving as We Can...: Poland Summary Report*, (October 2023); Mixed Migration Centre (MMC), *Displaced from Ukraine to Warsaw: A case study on journeys, living conditions, livelihoods and future intentions*, (2023).

<sup>42</sup> IOM, *Human Trafficking in the Ukraine Crisis*, (March 2023), p. 7.

<sup>43</sup> EU Solidarity Platform, *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*, (6 May 2022).

<sup>44</sup> For further details on specific anti-trafficking measures for Ukrainian refugees across the EU, see European Commission, *Report on the progress made in the fight against trafficking in human beings* (Fourth report), (19 December 2022); Key informant interview NL-K-01.

<sup>45</sup> For example, Pracuj.pl, [www.pracuj.pl/praca?ua=true](http://www.pracuj.pl/praca?ua=true); Federal Government of Germany, "The Germany4Ukraine Information Guide", [www.germany4ukraine.de/hilfeportal-en](http://www.germany4ukraine.de/hilfeportal-en); Switzerland, State Secretariat for Economic Affairs, "Ukraine war – information for job seekers and employers", [www.arbeit.swiss/secoalv/de/home/menue/institutionen-medien/projekte-massnahmen/ukraine-krise-informationen-stellensuchende-arbeitgeber.html](http://www.arbeit.swiss/secoalv/de/home/menue/institutionen-medien/projekte-massnahmen/ukraine-krise-informationen-stellensuchende-arbeitgeber.html); Ukraine Hilfe, [www.ukraine-hilfe-bern.ch/angebote](http://www.ukraine-hilfe-bern.ch/angebote).

Key informants described multiple information campaigns and communication initiatives to reduce the risks of refugees being exploited, as well as referring them to services to seek help if they were victims of abuses. These initiatives were carried out in key locations such as at border crossings, transport stops and accommodation centres, and on websites and social media.<sup>46</sup>

In Bern, Switzerland, this included police and social services organizing information campaigns in partnership with NGOs, participating in meetings with community leaders, and creating and disseminating leaflets and posters.<sup>47</sup> The authorities in Warsaw, Poland, disseminated information leaflets and screened volunteers offering services, with the support of NGOs and vetted volunteers.<sup>48</sup> Information was also generated and shared by displaced Ukrainians themselves, particularly on social media and in messaging apps, and some NGOs in host countries relied on Ukrainian staff members to support their information provision.<sup>49</sup> According to key informants, however, this information may not always be correct.<sup>50</sup>

« [Members of the Ukrainian community] actively shared advice, such as avoiding specific job offers and profiles of individuals known to be exploitative. This mutual support network was crucial in protecting vulnerable individuals from exploitation. »

Key informant from an NGO interviewed in Bern<sup>51</sup>

Anti-trafficking hotlines operate in the cities under study, and, since 2022, provide services in Ukrainian and Russian. This includes La Strada NGO's hotline in Warsaw, which can also be contacted on messaging apps, and is operated in conjunction with the National Intervention and Consultation Centre for Victims of Human Trafficking (NICC).<sup>52</sup> The Polish Ministry of the Interior and Administration increased the financing of the NICC by almost 40 per cent in 2023.<sup>53</sup> In Bern, the National Hotline against Human Trafficking and Exploitation provides services in Ukrainian by phone and online.<sup>54</sup> In Berlin, anti-trafficking NGOs provide services and information in Ukrainian, Russian and other languages.<sup>55</sup>

<sup>46</sup> Key informant interviews 1DE-K-07; 1DE-K-09; 1PL-K-07; 1CH-K-12; 2CH-K-02; 2CH-K-06; 2CH-K-07; 2PL-K-04; see, e.g., Poland, Ministry of the Interior, *Human Trafficking Report: Human trafficking is a crime 2022*, (2023).

<sup>47</sup> Key informant interviews 1CH-K-12; 1CH-K-09; 2CH-K-02.

<sup>48</sup> Poland, Ministry of the Interior, *Human Trafficking Report: Human trafficking is a crime 2022*, (2023).

<sup>49</sup> Key informant interviews 1CH-K-07; 1CH-K-06.

<sup>50</sup> Key informant interview 1CH-K-09.

<sup>51</sup> Key informant interview 2CH-K-06.

<sup>52</sup> La Strada, *Рекомендації* (Translation: Recommendations): <https://strada.org.pl/helpua/rekomendatsii>.

<sup>53</sup> Information provided to UNODC by the Permanent Mission of Poland to the United Nations Office and the International Organisations in Vienna, on 31 October 2024.

<sup>54</sup> ACT212, National Hotline against Human Trafficking and Exploitation, [www.act212.ch/en/hotline](http://www.act212.ch/en/hotline).

<sup>55</sup> For example, Ban Ying, "030-4406373", [www.ban-ying.de](http://www.ban-ying.de).

## Registering and monitoring key locations

Another key aspect of the targeted anti-trafficking response in the three countries where the research was undertaken was a recognition of the risks of unregistered volunteers offering transportation and other forms of support to refugees from Ukraine. This was particularly important in bordering countries such as Poland.<sup>56</sup> According to a key informant who was present at the Ukraine-Poland border in February-March 2022, more than 100,000 refugees were arriving per day in Poland at that time and the authorities were overwhelmed.<sup>57</sup> Subsequently, the Polish police began to register the cars, drivers and passengers in the case of transportation offers.<sup>58</sup> The Polish Ministry of the Interior and Administration, in cooperation with the Polish police, also developed a mechanism for screening organizations, foreign entities and individuals who wished to volunteer or provide humanitarian aid to Ukrainian refugees, to prevent abuse or sexual exploitation of vulnerable people.<sup>59</sup>

« *They did thousands of checks [in Romania] almost daily of places where Ukrainians live, in small communities. This also entails checks of the criminal records of hosts - for instance records of sexual abuse or domestic violence.* »

Regional key informants interviewed in 2023<sup>60</sup>

Police, other authorities and NGOs in Berlin and Bern also increased efforts to monitor certain locations for risks of exploitation and trafficking, such as at brothels (see section 5.4 below on trafficking for sexual exploitation), railway and bus stations and accommodation centres, and online.<sup>61</sup> There were regular verifications at accommodation centres and locations by the services of the Swiss State Secretariat for Migration (SEM).<sup>62</sup>

<sup>56</sup> Key informant interview 1PL-K-07.

<sup>57</sup> Key informant interview 2PL-K-06.

<sup>58</sup> Key informant interview 1PL-K-01.

<sup>59</sup> Information provided to UNODC by the Permanent Mission of Poland to the United Nations Office and the International Organisations in Vienna, on 31 October 2024.

<sup>60</sup> Key informant interview IN-K-02.

<sup>61</sup> Key informant interviews 1CH-K-01; 1DE-K-07; 1CH-K-12; 2CH-K-06; KOK, *Menschenhandel und Ausbeutung im Kontext des Ukrainekrieges – Eine Untersuchung aus Sicht spezialisierter Fachberatungsstellung zur Situation in Deutschland* (Translation: Trafficking in Persons and Exploitation in the context of the war in Ukraine – Perspectives from help centres about the situation in Germany), (October 2022).

<sup>62</sup> Key informant interviews 1CH-K-09; 1CH-K-11.

Such operations can, however, be compromised if refugees distrust the authorities, due to general perceptions of authorities or specific experiences.<sup>63</sup> A key informant interviewed in Bern in 2023 reported that there are still many barriers to reporting abuses to the police, since it involves approaching and speaking to police officers in a different language in an intimidating and public location.<sup>64</sup> Another key informant interviewed in 2023 referred to cases discussed in Ukrainian groups on a messaging app, where Ukrainians had reported issues to the police and the police had been unable to take any action.<sup>65</sup>

## 2.4 Situation of people who fled Ukraine in the EU and Switzerland

While visa-free travel and rapid access to temporary protection status, together with a robust anti-trafficking response, appear to have increased the resilience of refugees from Ukraine to trafficking and exploitation in receiving countries in Europe, some vulnerability factors persist, particularly in relation to income generation and accommodation.<sup>66</sup>

### Access to employment

Most people who fled Ukraine have a legal status in receiving countries that allows them to access the labour market, start a business or attend education. Overall, the integration of Ukrainian refugees into labour markets in Europe has been proceeding apace, with over 40 per cent of working-age Ukrainian refugees in employment in countries like the Netherlands, Lithuania and Estonia.<sup>67</sup>

The majority of survey respondents for this research in Berlin, Warsaw and Bern had a stable income prior to leaving Ukraine (78%), with no differences between genders. However, 46 per cent stated that they were not personally earning any money at the time of the survey – though this does not preclude the possibility that someone in their household or immediate family may have been supporting them financially. This includes 83 per cent of women and 78 per cent of men surveyed in Bern, Switzerland, where the rates were the highest.

When asked why they were not earning money, 44 per cent of those not earning money stated that they could not find employment, 12 per cent stated that they were retired, and nine per cent stated that they were taking care of children at home. 22 per cent of all respondents had a regular paid job, 16 per cent were receiving social benefits, seven per cent had casual/occasional work with a contract and five per cent worked with no contract.

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<sup>63</sup> Key informant interview 1DE-K-09.

<sup>64</sup> Key informant interview 1CH-K-09.

<sup>65</sup> Key informant interview 1CH-K-07.

<sup>66</sup> MMC, *Vulnerability and Resilience to Exploitation and Trafficking among People fleeing Ukraine in Berlin, Bern and Warsaw* (Geneva, MMC, 2024).

<sup>67</sup> OECD and EUAA, *Voices in Europe: Experiences, Hopes and Aspirations of Forcibly Displaced Persons from Ukraine*, (Paris, OECD Publishing, 2024).

While 24 per cent of respondents to the SAM-UKR survey in 2022 covered their living expenses with their wages, 44 per cent did so in 2023. This comprises 35 per cent working in the receiving country and nine per cent working remotely (for employers in Ukraine or elsewhere).<sup>68</sup> According to the European Foundation for the Improvement of Living and Working Conditions (Eurofound) and the Fundamental Rights Agency of the EU (FRA), 62 per cent of adults displaced from Ukraine had actively looked for a job in the host country, two-thirds of whom had already been employed there, by early autumn 2022.<sup>69</sup>

However, there remain indications of financial precarity. 54 per cent of respondents to the SAM-UKR survey in 2022 *“primarily relied on their personal savings to meet their living expenses.”* In 2023, 28 per cent were able to do so.<sup>70</sup> A significant proportion of Ukrainian refugees interviewed for IOM’s research in Poland and Romania stated that their income was insufficient to cover their expenses – 27 per cent in Poland and 29 per cent in Romania.<sup>71</sup>

Much of the labour market integration of Ukrainians has been in low-skilled sectors, including for refugees with higher skill levels.<sup>72</sup> This is largely due to lack of knowledge of the local languages of host cities and of their rights, and challenges with the recognition of qualifications obtained in Ukraine.<sup>73</sup> Eurofound and FRA also pointed to the lack of availability of regular work outside of the informal labour market.<sup>74</sup>

« *The typical family here, it’s mum and grandmother, with one or two children. [...] this woman cannot work - her children go to school until noon, then they have two hours for lunch. So the mum cannot work and language is an additional challenge. If they have small children, they can only have four hours a day of childcare.* »

Key informant from an anti-trafficking NGO in Bern, interviewed in 2023<sup>75</sup>

<sup>68</sup> OECD and EUAA, *Voices in Europe*, (2024), op. cit.

<sup>69</sup> Eurofound and FRA, *Barriers to employment of displaced Ukrainians*, (Luxembourg, Publications Office of the European Union, 2023). Based on an online survey of over 14,000 people.

<sup>70</sup> OECD and EUAA, *Voices in Europe*, (2024), op. cit., p. 43.

<sup>71</sup> Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons in the context of the war in Ukraine: The case of Poland and Romania* (2024).

<sup>72</sup> OECD and EUAA, *Voices in Europe*, (2024), op. cit.; Key informant interview 2PL-K-02.

<sup>73</sup> IOM, *Vulnerability to Trafficking in persons*, (2024), op. cit.; OECD and EUAA, *Voices in Europe*, (2024), op. cit.; Eurofound and FRA, *Barriers to employment*, (2023), op. cit.; Key informant interviews 2DE-K-02; 2DE-K-03; 2DE-K-06; 1PL-K-04; 1PL-K-06; 1PL-K-07; 2PL-K-01; 2PL-K-04; 2PL-K-05; 2CH-K-05; 2CH-K-07; IN-K-02.

<sup>74</sup> Eurofound and FRA, *Barriers to employment*, (2023), op. cit.

<sup>75</sup> Key informant interview 1CH-K-11.

The lack of sufficient provision for childcare and for other caring responsibilities (e.g., family members who are elderly or have disabilities) of working-age refugees present a further obstacle to employment.<sup>76</sup> According to a key informant in Warsaw, for example, employment opportunities in certain locations may be limited to shift work in factories, which is particularly difficult for parents: “We were told about women who lost their jobs because their children were getting sick and they had to stay home with them.”<sup>77</sup>

One of the key vulnerabilities identified among people who fled Ukraine in Poland is the employment of refugees without contracts or under civil law contracts rather than formal employment contracts subject to the Labour Code (see section 5.3 below on cross-border trafficking for forced labour).<sup>78</sup> The civil-law contract (*umowa zlecenie*, or “contract of mandate”) is a flexible contract, subject to less stringent regulations, with no set limitation on working hours and no mandatory benefits or leave days.<sup>79</sup> Not having a labour-law contract makes Ukrainian domestic workers particularly vulnerable to exploitation. Ukrainian domestic workers in Poland rarely have a contract or access to employment rights.<sup>80</sup>

## The housing situation

The urgent need to pay for accommodation also makes refugees from Ukraine vulnerable to forced labour, being underpaid and working below their qualification levels, especially in cases where the employer provides the accommodation.<sup>81</sup> If someone loses their job, they may no longer be able to afford accommodation. One key informant also identified a lack of valid identity documents as an obstacle to accessing accommodation, leaving some refugees homeless.<sup>82</sup> Ukrainians are sometimes housed in hostels with no regular presence of social workers.<sup>83</sup> Lack of access to accommodation is particularly acute due to a lack of housing supply in general in important host countries like Germany and Poland.<sup>84</sup>

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<sup>76</sup> OECD and EUAA, *Voices in Europe*, (2024), op cit.; Key informant interviews 2DE-K-02; -03; -06; IN-K02.

<sup>77</sup> Key informant interview 2PL-K-05.

<sup>78</sup> Key informant interviews 2PL-K-04; 1PL-K-06; 2PL-K-07; IOM, *Vulnerability to Trafficking*, (2024), op. cit.

<sup>79</sup> Piotr Lewandowski, Jan Baran, Aneta Kielczewska, Jakub Sawulski, *Case Study: Gaps in access to social protection for people working under civil law contracts in Poland*, Institute for Structural Research (IBS) for the European Commission, (Luxembourg, Publications Office of the EU, 2018).

<sup>80</sup> JB Klakla, M Koss-Goryszewska, A Kulesa, K Pajak-Zateska and M Zarychta, *In the Shadows. Ukrainian Domestic Workers in Poland*, *Care International*, (Warsaw, 2023).

<sup>81</sup> Key informant interviews 2PL-K-01; 2PL-K-02; 2PL-K-03; 2PL-K-04; 2PL-K-05; 2CH-K-02.

<sup>82</sup> Key informant interview 2PL-K-03.

<sup>83</sup> Key informant interview 2DE-K-07.

<sup>84</sup> The housing supply in Poland in 2023 was low, with 419 dwellings per 1,000 population, though this was a slight improvement compared to 2022 (412). Statistics Poland (2024). “Housing Economy in 2023”:

[https://stat.gov.pl/download/gfx/portalinformacyjny/en/defaultaktualnosci/3309/10/7/1/housing\\_economy\\_in\\_2023.pdf](https://stat.gov.pl/download/gfx/portalinformacyjny/en/defaultaktualnosci/3309/10/7/1/housing_economy_in_2023.pdf). The

housing situation in Germany was slightly better, at 516 dwellings per inhabitant in 2023: Germany, Statistisches Bundesamt

(Destatis, 2024): [www.destatis.de/EN/Themes/Society-Environment/Housing/Tables/liste-dwellings.html#55566](http://www.destatis.de/EN/Themes/Society-Environment/Housing/Tables/liste-dwellings.html#55566). In

Switzerland, housing supply is higher, at 641 dwellings per 1,000 population: Switzerland, Federal Statistics Office (2024):

[www.bfs.admin.ch/bfs/en/home/statistiken/bau-wohnungswesen.gnpdetail.2024-0526.html](http://www.bfs.admin.ch/bfs/en/home/statistiken/bau-wohnungswesen.gnpdetail.2024-0526.html).

This was mitigated to a certain extent by the willingness of private individuals to host refugees from Ukraine, according to a key informant from an NGO in Berlin.<sup>85</sup> However, private hosting arrangements may present a risk of exploitation in domestic work and of sexual abuse or exploitation, due to the implicit relationship of dependency of refugees on host families. According to two key informants, some hosts expect to receive a portion of the social welfare payments people with temporary protection status are entitled to.<sup>86</sup> Key informants interviewed in 2023 in Berlin and Warsaw considered the limited vetting procedures for families providing accommodation to refugees as a risk factor for abuse.<sup>87</sup>

Investigative journalists interviewed for this research had screened online offers of assistance for Ukrainian refugees and identified a number of potentially abusive cases, such as accommodation being offered to women only.<sup>88</sup> Key informants mentioned sexual harassment, abuse and assault of Ukrainian women in vulnerable situations, including by accommodation providers and employers, and people offering Ukrainians help, with the intention of developing a romantic relationship with them.<sup>89</sup> A Ukrainian NGO worker, who herself travelled via South-Eastern Europe to Western Europe in early 2022, witnessed men in locations where refugees were congregating offering Ukrainian women places to stay and requesting their driving licences.<sup>90</sup>

A key informant interviewed in 2024 described the experience of a young Ukrainian woman who used the services of the NGO where the informant works. The woman was renting an apartment that was connected to her landlord's apartment through a common space. Over time, the landlord made the woman increasingly dependent on him, socially isolated her and accompanied her every time she ran errands. She ended up having sexual relations with him, which she felt she had to do in return for him hosting her. The key informant notes that such cases are challenging to pursue legally because of the difficulty of proving or disproving consent. The informant was aware of around eight other similar cases.<sup>91</sup>

On the other hand, the fact that the majority of refugees are not housed in camps or collective accommodation centres may also be a factor of resilience.<sup>92</sup> Large collective accommodation centres in the cities under study present indicators of vulnerability to abuse and exploitation. Key informants described the situation at the Tegel First Reception Centre in Berlin, which was intended for short periods of residence (less than a week) for Ukrainians only. During 2023-2024, the centre accommodated people of various nationalities for months - around 4,500 people at the time of the interview in 2024, including around 3,700 Ukrainians and around 800 people of other nationalities, according to two key informants.<sup>93</sup>

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<sup>85</sup> Key informant interview 1DE-K-03.

<sup>87</sup> Key informant interviews 1DE-K-03; 1PL-K-07.

<sup>88</sup> Key informant interviews 1DE-K-08; 1DE-K-03; 1PL-K-07; 2DE-K-03; NL-K-02.

<sup>89</sup> Key informant interview IN-K-01.

<sup>90</sup> Key informant interviews 1CH-K-07; 2CH-K-02; 2CH-K-03; 2CH-K-04.

<sup>91</sup> Key informant interview 1CH-K-11.

<sup>92</sup> Key informant interview 2CH-K-03.

<sup>93</sup> Key informant interview 2DE-K-05.

Risks were also reported at one of the main accommodation centres for refugees from Ukraine in Warsaw. A key informant interviewed for this research in 2023 indicated that there were risks of exploitation but that the security team was actively monitoring these risks. The centre staff also received training and support on trafficking in persons from an international organization and a local NGO. Women residing at the centre were reportedly involved in sex work in the vicinity of the centre, though the key informant did not have further details or any indications of exploitation.<sup>94</sup> Many collective accommodation centres in Poland have been closed since the first year of the displacement and, since March 2023, the state provides accommodation to people with temporary protection status only for a period of four months upon arrival.<sup>95</sup>

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<sup>94</sup> Key informant interview 1PL-K-08.

<sup>95</sup> Key informant interview 2PL-K-03. Changes were made on foot of an amendment to the relevant Polish law. See: Stowarzyszenie Interwencji Prawnej (Association for Legal Intervention (SIP), "The president has signed an amendment to the Special-purpose Act, (January 2024): <https://ukraina.interwencjaprawna.pl/the-president-has-signed-an-amendment-to-the-special-purpose-act>.



### 3. Journeys

#### 3.1 Leaving Ukraine

In late February 2022, hundreds of thousands of people - mostly Ukrainian but also of other nationalities - began to flee Ukraine.<sup>96</sup> People generally travelled distinct routes to exit the country, depending on their location in Ukraine. This is due to Ukraine's vast territory, as well as the difficulties and dangers of travelling within the country.<sup>97</sup>

People in west Ukraine generally crossed the land borders regularly into Poland, Slovakia, Hungary or north Romania, while those in the southwest and around Odesa crossed regularly into the Republic of Moldova or east Romania. Some remained in these bordering countries, while others continued on to other parts of Europe.<sup>98</sup> Some people located in east and north Ukraine, including in occupied territories, travelled to the Russian Federation. They either remained there or transited through Russia to regularly enter Latvia, Estonia or Finland.

Map of Ukraine



Source: UN Geospatial, October 2023

<sup>96</sup> UNHCR, *Global Trends: Forced Displacement in 2022* (United Nations publication, 2022).

<sup>97</sup> Key informant interview 2CH-K-01.

<sup>98</sup> See: IOM, "Ukrainians and Third-Country Nationals Crossing Back to Ukraine - 2023 Regional Analysis," (IOM, Vienna, April 2024).

The majority of border crossings by people displaced from Ukraine to the EU, via Moldova to the EU, and within the EU, are considered by the European Border and Coast Guard Agency (Frontex) to be “legal and orderly.”<sup>99</sup> Among respondents to the Survey of Arriving Migrants from Ukraine (SAM-UKR) during April 2022 to January 2023, 21 per cent had paid someone for transportation out of the country.<sup>100</sup> They paid on average €363 (US\$388), though amounts ranged from €9.30 to 9,300 (\$10.00-10,000). Most referred to transportation costs for exiting Ukraine and regularly entering transit and destination countries.<sup>101</sup>

528 Ukrainian respondents to a survey conducted in late 2022 in Switzerland provided detailed information about their journeys. The majority (60%) experienced journeys of 3-10 days and 13 per cent travelled for 1-2 days. For 27 per cent of respondents, the journey lasted longer than ten days. There were no significant differences according to age or gender. Most (66%) travelled by train, bus or plane, while 19 per cent travelled in their own car and 19 per cent availed of transportation organized by charities and support organisations. Ukrainian men used their own cars more commonly than Ukrainian women. One third of respondents had had to pay money or other objects of value at some point in order to continue their journey – slightly more common for women (35%) than men (23.5%).<sup>102</sup>

### 3.2 Risks

There are some indications of risks of abuse, exploitation and trafficking in the context of refugees’ journeys, particularly during the first weeks after the full-scale invasion. Risk factors included refugees’ determination to flee and travel onwards as quickly as possible, and the large numbers of unregistered individuals offering help, transportation and accommodation to people fleeing, a small minority of whom may have intended to traffic refugees.<sup>103</sup> The situation with regard to risks of unregistered individuals offering transportation, as well as accommodation, has reportedly improved since then, with some EU countries now requiring such people to register with the authorities (see section 2.3 above on Anti-trafficking measures).<sup>104</sup>

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<sup>99</sup> Frontex, *Risk Analysis for 2022/2023*, (Warsaw, 2022), p. 15.

<sup>100</sup> EUAA, IOM and OECD, “Surveys of Arriving Migrants from Ukraine (SAM-UKR)”, Factsheet, (2 February 2023).

<sup>101</sup> EUAA, IOM and OECD, *Forced displacement from and within Ukraine: Profiles, experiences, and aspirations of affected populations*, (October 2022). The survey was self-administered using a mobile phone and was available to respondents residing in all EU countries, in Ukrainian, Russian and English.

<sup>102</sup> Dirk Baier, Judith Bühler, and Andrea Barbara Hartmann, *Ukrainische Flüchtlinge in der Schweiz: Ergebnisse einer Befragung zu Fluchterfahrungen und zur Lebenssituation* (Translation: Ukrainian Refugees in Switzerland: Results of a Survey on Experiences of the Journey and Living Situations), (Zürich, Zürcher Hochschule für Angewandte Wissenschaften (ZHAW), Department Soziale Arbeit, 2022).

<sup>103</sup> UNODC, *Conflict in Ukraine*, (updated December 2022), op. cit.

<sup>104</sup> *Ibid.*

Among 538 Ukrainians surveyed for an academic study in Switzerland in 2022, just five respondents said that they had to pay ‘helpers’ for information or services (no further details provided).<sup>105</sup> Six per cent had come into conflict with people supporting them in various ways during the journey, while seven per cent had had to provide some form of non-monetary compensation, such as labour, in order to continue their journey (no further details provided).<sup>106</sup> 2.4 per cent experienced conflicts with the authorities or police – significantly more common for men than for women.<sup>107</sup>

« I have seen a lot of people travelling alone. A lot of people really wanted to help and came with honest proposals. But some people may offer to keep documents. [...] Many Ukrainians had not been to foreign countries before and had a hard time. »

Key informant from an anti-trafficking NGO interviewed in Bern in 2023<sup>108</sup>

The journeys were particularly difficult for certain groups. Specific groups of people displaced from Ukraine are in a more vulnerable situation, including unaccompanied and separated children; people who were previously internally displaced within Ukraine;<sup>109</sup> people who cannot access temporary protection (because they are not eligible, or due to lack of information or incorrect information); Ukrainian Roma people due to discrimination; non-Ukrainians, including undocumented and stateless people; elderly people; and people with mental and physical disabilities.<sup>110</sup>

<sup>105</sup> The wording was: “dass auf Informationen bzw. Dienstleistungen von Helfer:innen gegen Bezahlung zurückgegriffen wurde [that they resorted to paying for information or services from helpers].” Dirk Baier, Judith Bühler, and Andrea Barbara Hartmann, *Ukrainische Flüchtlinge in der Schweiz: Ergebnisse einer Befragung zu Fluchterfahrungen und zur Lebenssituation*, (Zürich, Zürcher Hochschule für Angewandte Wissenschaften (ZHAW), Department Soziale Arbeit, 2022), p11.

<sup>106</sup> The exact wording was: “Ich hatte Konflikte mit anderen Personen, die mich bei meiner Flucht unterstützten [I had conflicts with other people who were helping me on my journey]” and “Ich musste eine andere Gegenleistung erbringen (z.B. Arbeiten), um mit meiner Flucht weiter voranzukommen [I had to provide some other form of compensation (e.g. working), in order to continue my journey].” Baier, Bühler and Hartmann, *Ukrainische Flüchtlinge in der Schweiz* (2022), op. cit., p12.

<sup>107</sup> Baier, Bühler and Hartmann, *Ukrainische Flüchtlinge in der Schweiz* (2022), op. cit.

<sup>108</sup> Key informant interview 1CH-K-11.

<sup>109</sup> EUAA, IOM and OECD, *Forced displacement from and within Ukraine: Profiles, experiences, and aspirations of affected populations*, (2022). 22% of survey respondents had been internally displaced in Ukraine before they entered the EU.

<sup>110</sup> For an analysis of vulnerabilities and resilience to trafficking as part of this project, see: MMC, *Vulnerability and Resilience to Exploitation and Trafficking among People fleeing Ukraine in Berlin, Bern and Warsaw* (Geneva, MMC, 2024). See also: Suzanne Hoff and Eefje de Volder, *Preventing human trafficking of refugees from Ukraine*, (La Strada International and Freedom Fund, 2022); Europol, Early Warning Notification: War in Ukraine – refugees arriving to the EU at risk of exploitation as part of THB, (The Hague, Ref. No. 2022-340, 2022); UNICEF, “Children fleeing war in Ukraine at heightened risk of trafficking and exploitation”, press release, (19 March 2022).

Many Ukrainians, including Ukrainian Roma, from Zakarpattia (Transcarpathia) oblast in western Ukraine have dual Ukrainian and Hungarian citizenship, which reportedly on occasion led to refusals of temporary protection as the applicants were considered Hungarian citizens.<sup>111</sup> Issues with accessing temporary protection were also linked to some Ukrainian Roma people not having identity documents. Accounts of racial discrimination against Ukrainians of Roma ethnicity were provided by several key informants.<sup>112</sup>

According to one key informant: *"In the beginning, there were a lot of cases of racist experiences. At the border, people who didn't 'look Ukrainian' weren't allowed to [enter an EU country]."* They were sometimes mislabelled 'fake refugees' and prevented from travelling to seek temporary protection.<sup>113</sup> Key informants indicated that Ukrainian Roma people have been prevented from accessing collective accommodation sites, allocated segregated accommodation and given reduced access to essential services.<sup>114</sup>

One in five families (22%) surveyed by UNHCR in countries bordering Ukraine in 2023 had *"at least one family member with specific needs, such as disabilities and serious medical conditions"*, with 12 per cent having at least one household member with a disability.<sup>115</sup> Refugees with disabilities experience challenges in accessing social welfare, healthcare, mobility aids and devices, assistive technologies and other forms of support, as well as obstacles to having their disability status officially recognized.<sup>116</sup> Services in receiving countries have struggled to respond, as it is uncommon for elderly refugees and refugees with disabilities to make it to host countries in Europe.<sup>117</sup>

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<sup>111</sup> See, e.g.: Zdeněk Ryšavý (17 April 2022), "In Czech Republic, the Hungarian passports held by some Romani refugees from Ukraine have not proved to be an advantage": <https://romea.cz/en/news/czech/in-czech-republic-the-hungarian-passports-held-by-some-romani-refugees-from-ukraine-have-not-proved-to-be-an-advantage>.

<sup>112</sup> Melde und Informationsstelle Antiziganismus (MIA), *Antiziganismus gegen ukrainische Roma geflüchtete in Deutschland* (Translation: Anti-gypsyism against Ukrainian Roma refugees in Germany), (April 2024); Key informant interviews 2DE-K-03; 2DE-K-04; 2PL-K-05

<sup>113</sup> Key informant interview 2DE-K-04. See also: Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons in the context of the war in Ukraine*, (2024), *op. cit.*

<sup>114</sup> Key informant interviews 2DE-K-03; 2DE-K-04; 2PL-K-05; Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons in the context of the war in Ukraine*, (2024), *op. cit.*

<sup>115</sup> UNHCR, *Displacement Patterns, Protection Risks and Needs of Refugees from Ukraine – Regional Protection Analysis #2*, (April 2023), p. 13; See also EUAA, *Displaced Ukrainians with Disabilities Seeking Temporary Protection in Europe*, Situational Update Issue No. 20 (18 January 2024).

<sup>116</sup> Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons in the context of the war in Ukraine: The case of Poland and Romania*, (2024).

<sup>117</sup> Key informant interviews 2DE-K-07; 2CH-K-01; 2PL-K-03.

« Many people with disabilities were stranded in Ukraine and did not have enough money or help to leave. [...] Some people suffered heart attacks or died presumably because of the stress. Trains from Ukraine to Chełm, [eastern] Poland, had up to 200 people in one train carriage. It was difficult for people with disabilities to get on the train. It was difficult for them to bring what they needed to support their disability. Some people boarded the trains without their wheelchairs, due to lack of space, and many people travelled without their documents. »

Key Informant interviewed in Bern in 2024<sup>118</sup>

A specific form of abuse was reported, whereby Ukrainian women with disabilities were targeted by Ukrainian men wishing to leave Ukraine. The men marry the women so that they qualify for an exemption from martial law provisions prohibiting them from leaving the country (see next section). Key informants referred to groups on social media where Ukrainian men post that they wish to marry a woman with a disability and women with disabilities post asking for men to pay them for the marriage. Key informants knew of cases where the men left the women without resources after they had successfully left Ukraine.<sup>119</sup>

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<sup>118</sup> Key informant interview 2CH-K-01.

<sup>119</sup> Key informant interviews UA-K-03; 2CH-K-01; 2CH-K-02; 2CH-K-04.

« A Ukrainian woman's social worker asked her to marry him so he could leave Ukraine. [...] According to the woman, her former social worker started physically and mentally abusing her when they arrived in Germany - not preparing food for her and not helping her go to the toilet. The woman called a hotline for domestic abuse in Germany and a hotline set up by a Ukrainian disability rights activist. »

Key informant interviewed in Bern in 2024<sup>120</sup>

Among over one million non-Ukrainians from outside the EU who fled the full-scale invasion,<sup>121</sup> many experienced discrimination during the journey. According to a key informant, they were not always facilitated in travelling onwards from an EU country bordering Ukraine to another EU country.<sup>122</sup> This group also experienced challenges in accessing rights and services in EU countries and difficulties obtaining and maintaining a regular residence status.<sup>123</sup> Two key informants described how some Belarusians, who had refugee status in Ukraine, experienced difficulties renewing their passports and maintaining a regular legal status in EU countries.<sup>124</sup> One key informant also described issues with residence permits for women from a Southeast Asian country who fled Ukraine.<sup>125</sup>

A Berlin Senate Regulation from August 2022 provides for the support of non-Ukrainian non-EU citizens who were studying in Ukraine before the war and wish to continue their studies in Berlin.<sup>126</sup> An organization was founded in Berlin to support such students, financially supported by the state.<sup>127</sup> Berlin is also one of the German federal states that allows students to remain for six months until they find a place to study in Berlin.<sup>128</sup>

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<sup>120</sup> Key informant interview 2CH-K-01.

<sup>121</sup> IOM, *Ukraine and Neighbouring Countries 2022-2024: Two Years of Response*, (February 2024).

<sup>122</sup> Key informant interview 2PL-K-02.

<sup>123</sup> FRA, *The Russian war of aggression against Ukraine – the broad fundamental rights impact in the EU: Bulletin #2*, (Luxembourg, Publications Office of the EU, 2022); Key informant interviews 1PL-K-02; 2PL-K-02; 2PL-K-05; 2DE-K-02.

<sup>124</sup> Key informant interviews 2PL-K-02; 2PL-K-05.

<sup>125</sup> Key informant interview 2DE-K-02.

<sup>126</sup> Germany, Senate Department for Internal Affairs, Digitalization and Sports), Senate Bill No. S-606/2022.

<sup>127</sup> Key informant interview 2DE-K-02.

<sup>128</sup> Key informant interview 2DE-K-03.

### 3.3 Men exiting Ukraine

The Government of Ukraine declared martial law and general mobilization in response to the full-scale invasion in February 2022, which have since been extended thirteen times, most recently at the time of writing until February 2025.<sup>129</sup> Article 22.6 of the Mobilization Law states that, during the period of general mobilization, all Ukrainian men aged 18-60 years must carry a military registration document and present it at the country's borders at the request of the State Border Guard Service (SBGS) of Ukraine. These men are not permitted to leave Ukraine unless they qualify for an exemption.<sup>130</sup>

Exemptions are in place for men with three or more dependent children; single fathers; men with disabilities or health issues; men with children, spouses or parents with disabilities; carers of sick spouses, children or parents; senior civil servants, politicians and judges; ambassadors; certain categories of students and researchers; and relatives of people who died in combat, among others.<sup>131</sup> The majority of the 391 Ukrainian men surveyed for this research gave responses that suggest that they qualify for exemptions.

There are two main ways in which men who do not qualify for exemptions attempt to exit Ukraine, evading the martial law provisions prohibiting their departure. They either cross Ukraine's borders and enter another country at an unofficial land border crossing point, usually across rivers or mountains, or they use fraudulent or fraudulently obtained documents to qualify for an exemption and cross at an official border crossing point. Both situations may involve engagement with criminal actors to facilitate irregular exit from Ukraine, but migrant smuggling according to international law is only committed if a third party facilitates irregular entry to another country or provides fraudulent travel documents for the purposes of irregular entry.

According to the UN Smuggling of Migrants Protocol, smuggling of migrants entails *"the procurement, in order to obtain, directly or indirectly, a financial or other material benefit, of the illegal entry of a person into a State Party of which the person is not a national or a permanent resident [emphasis added]."* The Protocol further states that illegal entry means *"crossing borders without complying with the necessary requirements for legal entry into the receiving State."*<sup>132</sup>

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<sup>129</sup> The Ukrainian Government declared martial law and general mobilization in February 2022, and has since extended both martial law (<https://itd.rada.gov.ua/billInfo/Bills/Card/45119>) and general mobilization (<https://itd.rada.gov.ua/billInfo/Bills/Card/45120>) thirteen times, most recently at the time of writing in November 2024 for 90 days until 7 February 2025.

<sup>130</sup> Ukraine, Law No. 44, Law of Ukraine: On Mobilization Preparation and Mobilization, (1993), as amended. Exemptions are set out in Articles 23-24.

<sup>131</sup> *Ibid.*

<sup>132</sup> United Nations, Protocol against the Smuggling of Migrants by Land, Sea and Air, Supplementing the United Nations Convention against Transnational Organized Crime, (2000), Article 3.

During 2023, the Ukrainian SBGS detained around 11,000 Ukrainian men attempting to leave the country in violation of the martial law provisions, according to Ukrinform (Укрінформ), the Ukrainian national news agency. Around 8,000 of these men were attempting to walk or swim across the borders with Romania, Moldova, Poland, Hungary or Slovakia outside of official border crossings, while around 3,000 presented fraudulent documents at the border indicating that they were exempt from the provisions prohibiting them from leaving Ukraine (mostly at the border with Poland).<sup>133</sup> According to the SBGS, most of these men used “organizers”.<sup>134</sup>

While all of the men intercepted by the Ukrainian authorities were violating the provisions of domestic Ukrainian martial law and mobilization provisions, not all Ukrainian men in this category were attempting to irregularly enter another country. Visa-free entry to European countries and temporary protection status also apply to Ukrainian men subject to the domestic prohibition on departing Ukraine. This means that if Ukrainian men present themselves at an official border crossing point with valid travel documents, then their entry into a bordering country is regular.

A significantly higher percentage of men surveyed for this research stated that they paid someone to help them cross a border irregularly (9.7%) compared to women (3.6%). However, some Ukrainian men surveyed may have been referring to the facilitation of irregular exit rather than entry. Eighty-two per cent (31/38) of smuggled men surveyed were Ukrainian and almost all the smuggled Ukrainian men (30/31) were aged 18-60 years. Forty-five per cent were aged 27-60 years, while most of the remainder were aged 18-26. Ukrainian men were eligible for conscription as of 27 years old at the time of the survey, though this was lowered to 25 in April 2024.<sup>135</sup>

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<sup>133</sup> Ukrinform, “За час війни викрили майже 400 груп, які допомагали ухлянтам тікати за кордон” (Translation: During the war, almost 400 groups who helped evaders flee abroad were exposed), 18 March 2024; Key informant interviews 2CH-K-04; 2PL-K-01. See also Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons in the context of the war in Ukraine: The case of Poland and Romania*, (2024).

<sup>134</sup> Ukrinform, “Андрій Демченко, речник Державної прикордонної служби” (Translation: Andriy Demchenko, spokesman of the State Border Service” (29 April 2024): [www.ukrinform.ua/rubric-ato/3857901-andrij-demcenko-recnik-derzavnoi-prikordonnoi-sluzbi.html](http://www.ukrinform.ua/rubric-ato/3857901-andrij-demcenko-recnik-derzavnoi-prikordonnoi-sluzbi.html).

<sup>135</sup> On Amendments to the Law of Ukraine “On Military Duty and Military Service” (Information of the Verkhovna Rada (VVR), 2024, No. 18, Article 75): <https://zakon.rada.gov.ua/laws/show/3127-IX>.

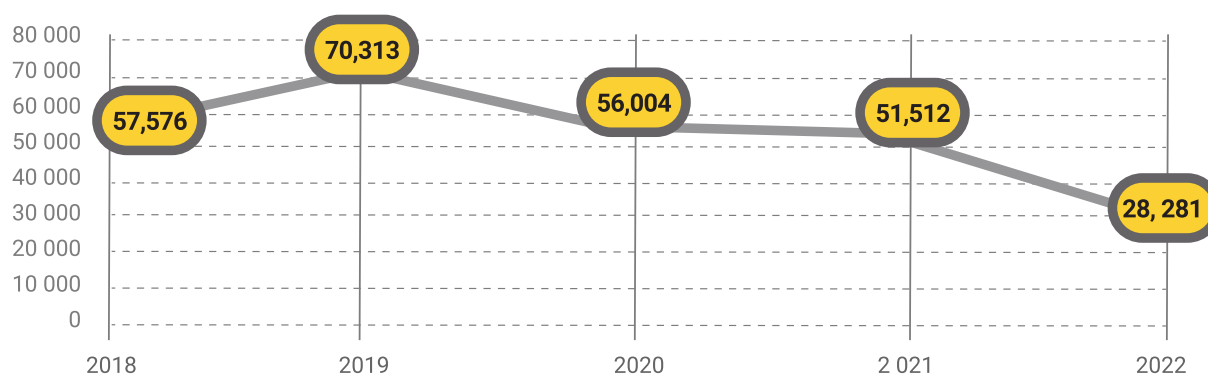


## 4. Paying for Facilitation of Irregular Border Crossings

### 4.1 Smuggling of migrants before 2022

Few Ukrainians were identified making irregular border crossings into the EU by sea or land (less than 100 per year) during the years prior to 2022, as Ukrainians have been able to enter the EU visa-free since 2017. However, Ukrainians were among the top nationalities of people detected irregularly residing and using fraudulent documents in the EU before 2022.<sup>136</sup> Ukrainians were the largest group by nationality refused entry at EU borders during 2018-2021, comprising 40 per cent of the total (see Figure 3). In 2022, the numbers of Ukrainians refused entry at EU borders decreased significantly: from over 51,500 in 2021 to 28,300 in 2022.<sup>137</sup>

Figure 3: Ukrainians refused entry at EU borders



Source: Frontex

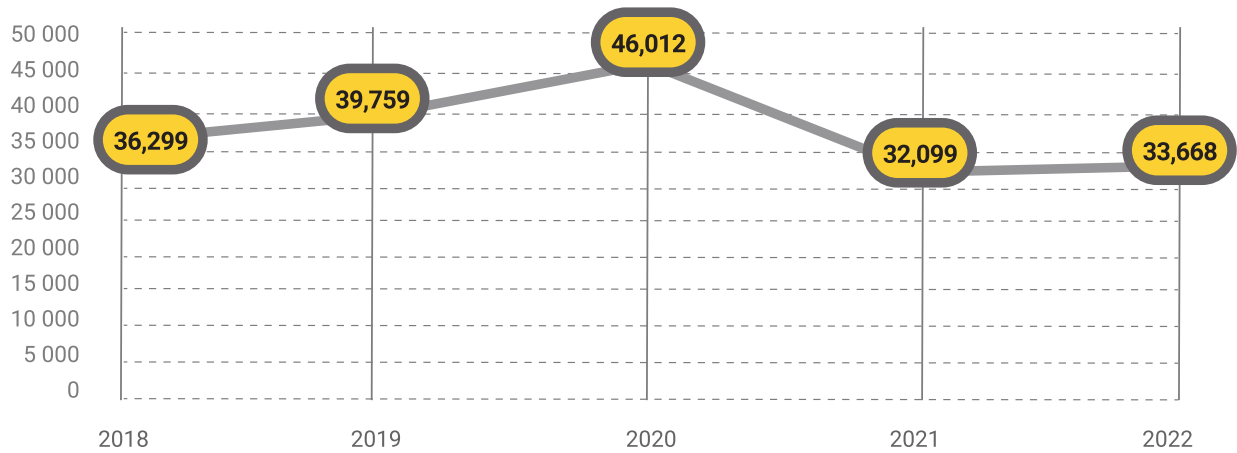
During 2018-2021, Ukrainians were the sixth largest group by nationality of people detected in the EU with 'illegal stay', comprising seven per cent of the total. The number of Ukrainians detected with 'illegal stay' increased slightly in 2022, compared to 2021 (see Figure 4).<sup>138</sup>

<sup>136</sup> Frontex, *Risk Analysis for 2022/2023*, (Warsaw, 2022); Frontex, *Risk Analysis for 2021*, (Warsaw, 2021); European Migrant Smuggling Centre (EMSC), *6th Annual Report*, (Luxembourg, Publications Office of the EU, 2022).

<sup>137</sup> Frontex, *Risk Analysis for 2022/2023*, (Warsaw, 2022); Frontex, *Risk Analysis for 2023/2024*, (Warsaw, 2023).

<sup>138</sup> Frontex, *Risk Analysis for 2022/2023*, (Warsaw, 2022); Frontex, *Risk Analysis for 2023/2024*, (Warsaw, 2023).

Figure 4: Ukrainians identified in the EU with "illegal stay"



Source: Frontex

In addition to refusal of entry and illegal stay, in 2020, 2021 and 2022, Ukrainians were the largest national group detected at an EU external border using fraudulent documents, with an increasing trend in 2020 (1,258) and 2021 (3,067), followed by a decrease in 2022 (760).<sup>139</sup>

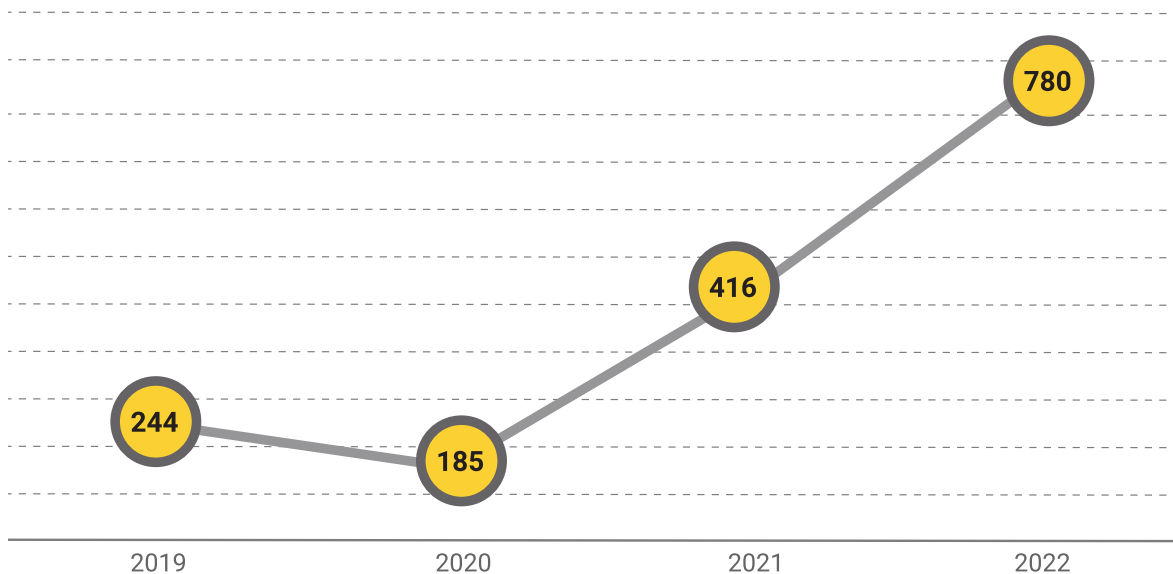
Prior to 2022, Frontex considered Ukraine "a source and transit country of cross-border criminality."<sup>140</sup> During the period 2019-2022, the largest group by nationality of migrant smugglers detected at the EU's land borders were Ukrainian, comprising 11 per cent of the total, with an increasing trend. Ukrainians comprised five per cent of all detected migrant smugglers at the land, sea and air borders of the EU and inland during this period.<sup>141</sup>

<sup>139</sup> Frontex, *Risk Analysis for 2022/2023*, (Warsaw, 2022); Frontex, *Risk Analysis for 2023/2024*, (Warsaw, 2023).

<sup>140</sup> Frontex, *Risk Analysis for 2022/2023*, (Warsaw, 2022), p. 9.

<sup>141</sup> Frontex, *Risk Analysis for 2023/2024*, (Warsaw, 2023).

Figure 5: Ukrainian migrant smugglers detected at EU borders and in the EU



Source: Frontex

According to Europol, in 2021, Ukrainians were employed by migrant smuggling groups to navigate leisure and fishing vessels smuggling West and South Asians from Türkiye to Italy. Smuggled people were charged up to €12,000 (US\$13,000) per person. The Ukrainian sailors were sometimes recruited through job advertisements on social media.<sup>142</sup> In 2019, an organized crime group of Ukrainians and others, who smuggled over 13,000 people to the EU using fraudulently obtained visas based on fake employment documentation, was dismantled. During at least six years of activity, the group had an income of over €2.3 million (US\$2.5 million).<sup>143</sup> Ukrainians were also involved in committing smuggling of migrants offences in South-Eastern Europe as drivers.<sup>144</sup>

Some Ukrainians convicted of smuggling offences abroad were subsequently considered by the Ukrainian authorities as victims of trafficking for exploitation in forced criminal activities (smuggling of migrants) by criminal groups.<sup>145</sup> Law enforcement agencies referred a number of victims for assistance to an anti-trafficking NGO in Ukraine, after they returned from Türkiye in early 2022, shortly before the beginning of the full-scale invasion.<sup>146</sup>

<sup>142</sup> EMSC, *6th Annual Report*, (Luxembourg, Publications Office of the EU, 2022).

<sup>143</sup> EMSC, *4th Annual Report*, (Luxembourg, Publications Office of the EU, 2020).

<sup>144</sup> Tihomir Bezlov, Atanas Rusev and Dardan Koçani, *Borderline: Impact of the Ukraine War on Migrant Smuggling in South Eastern Europe*, Center for the Study of Democracy (CSD) and Global Initiative Against Transnational Organized Crime, (September 2023).

<sup>145</sup> Data provided to UNODC by the Office of the Prosecutor General of Ukraine in January 2024.

<sup>146</sup> Key informant interview UA-K-03.

The National Police of Ukraine (NPU), under the guidance of the Office of the Prosecutor General (OPG), conducted investigations in seven criminal proceedings on trafficking in persons relating to members of an organized criminal group that predate the full-scale invasion. Four defendants were found guilty of recruiting Ukrainian men (sailors) in economically vulnerable circumstances, with the purpose of involving them in committing migrant smuggling offences relating to people travelling from the Middle East to the EU. A joint investigative team was formed for these cases, with participation from Ukraine, Italy and Greece.<sup>147</sup>

## 4.2 Paying for facilitation of irregular border crossings in the context of displacement from Ukraine

In contrast to the irregular migration and smuggling of Ukrainians prior to 2022, as set out above, the overwhelming majority of Ukrainians fleeing the country since February 2022 did not pay for facilitation of irregular border crossings. Among 1,414 Ukrainians surveyed for this research, five per cent (70) reported paying for services to cross borders irregularly at some point, though these include 31 Ukrainian men who may have been exiting Ukraine irregularly rather than entering another country irregularly, as set out above.<sup>148</sup> Most of these people travelled by bus, train or private car – or a combination -, while 17 per cent were driven in someone else’s car. Among 184 non-Ukrainians from outside the EU who fled Ukraine, six per cent (11) reported paying for services to cross borders irregularly at some point; they comprised other Eastern Europeans, West Asians and North Africans.

Overall, the respondents who answered “yes” to the survey question “Did you pay for services to cross borders irregularly” comprised 38 men (among 391 Ukrainian and non-Ukrainian men interviewed) and 43 women (among 1,209 Ukrainian and non-Ukrainian women interviewed), meaning that a significantly higher percentage of men in the sample paid to cross borders irregularly (9.7%) compared to women (3.6%).

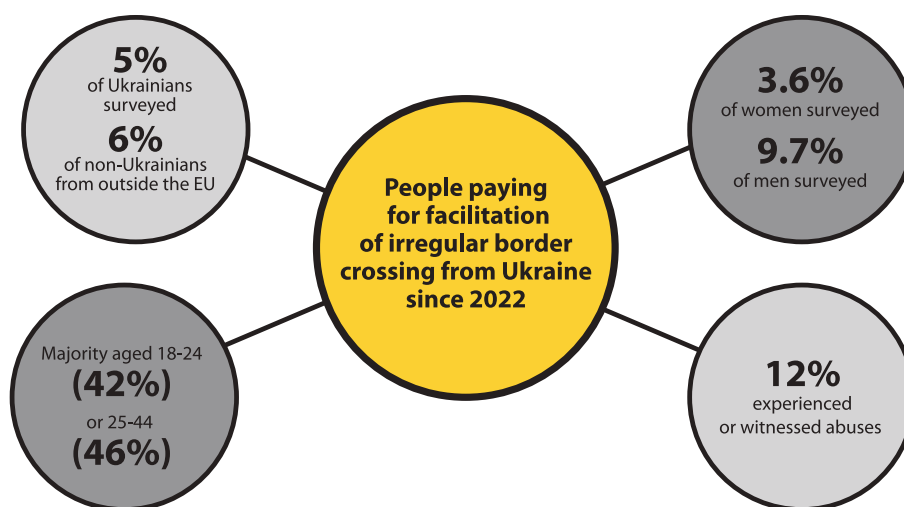
The majority of all those who paid to cross borders irregularly (88%) were aged 18-44 years. A higher proportion of men who paid to cross borders irregularly (55%) were aged 25-44 years old, compared to women in this age group (37%). Many women who paid for facilitation of irregular border crossing were younger, in the 18-24 years old age group (47%). 59 per cent of respondents who had paid for facilitation of irregular border crossing began their journey within the first two months of the outbreak of the conflict, compared to 53 per cent among all respondents.

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<sup>147</sup> Information provided to UNODC by the Office of the Prosecutor General of Ukraine in January 2024.

<sup>148</sup> See MMC, *Displaced from Ukraine to Berlin: A case study on journeys, living conditions, livelihoods and future intentions*, 20 June 2023; MMC, *Displaced from Ukraine to Warsaw: A case study on journeys, living conditions, livelihoods and future intentions*, (29 June 2023).

Figure 6: Experiences of paying for facilitation of irregular border crossing among respondents surveyed in Berlin, Warsaw and Bern in 2023



Source: Based on survey of 1,602 people who fled Ukraine for this study in 2023 in Berlin, Warsaw and Bern

A higher proportion of people who paid for facilitation of irregular border crossing experienced abuses compared to those who did not. Just over 12 per cent of people surveyed who paid for facilitation of irregular border crossing reported directly experiencing or witnessing some form of abuse during their journey, compared to six per cent among the total sample. These experiences included not being paid for work, being paid less than promised, being threatened with deportation, being deceived, restrained or locked up and having identity documents withheld by an employer.

Two key informants in Ukraine - from a state authority and from an NGO - interviewed in 2024, mentioned the recruitment of children as guides to assist in facilitating irregular border crossings at the Ukrainian land borders. The children are reportedly paid small sums for this service, with their parents' knowledge, as children can avoid criminal prosecution.<sup>149</sup> No other information was found to corroborate these reports.

Across the EU in 2022, cases were reported involving the use of fraudulent Ukrainian documents, including identity cards, driving licenses, passports and residence permits, by non-Ukrainians, in order to enter EU countries and access temporary protection status. However, it is not clear whether third parties facilitating the provision of the documents were involved.<sup>150</sup> Individual respondents to the SAM-UKR survey in 2022 indicated corruption and fraudulent activity in the temporary protection application procedure, through intermediaries advertising their services online.<sup>151</sup>

<sup>149</sup> Key informant interviews UA-K-03; UA-K-04.

<sup>150</sup> Content analysis of Europol Monitoring Team Reports (EPMT) March – November 2022. Europol Unclassified – Basic Protection Level; Frontex, Risk Analysis for 2023/2024, (Warsaw, 2023).

<sup>151</sup> EUAA, IOM and OECD, *Forced displacement from and within Ukraine: Profiles, experiences, and aspirations of affected populations*, (October 2022).

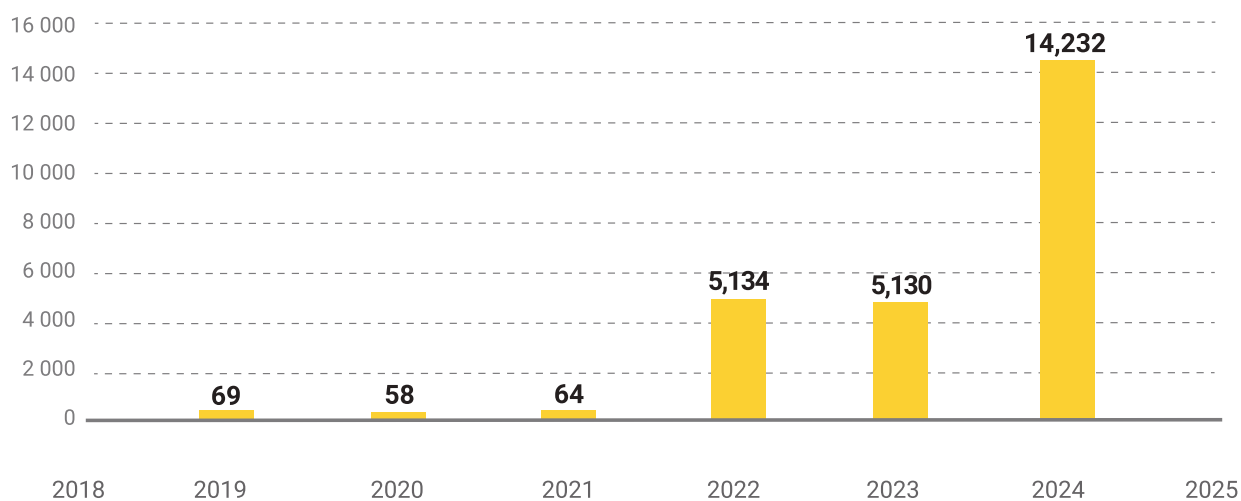
The low level of smuggling of migrants in the context of the cross-border displacement of over six and a half million people contrasts starkly with the situation of other refugee groups in Europe, from the Middle East, Africa and Asia. The combination of visa-free entry to other European countries and rapid access to temporary protection has massively prevented smuggling of migrants related to the war in Ukraine.

### 4.3 Paying for facilitation of irregular border crossings by Ukrainian men

#### Clandestine border crossings

During the period January 2022 to December 2024, 24,496 Ukrainians – almost all Ukrainian adult men - were detected making an “illegal border crossing” at Ukrainian borders with EU countries, according to Frontex. This is compared to 191 Ukrainians identified making such a crossing during the period 2019-2021. There was a significant acceleration in numbers in 2024, when Frontex recorded 14,232 irregular border crossings by Ukrainians at the Eastern Land Borders of the EU – almost triple the figure for 2023.<sup>152</sup>

Figure 7: Detections of Irregular Border Crossings by Ukrainians into the EU at the Eastern Land Borders\*



Sources: UNODC calculations based on Frontex data.

\*'Eastern Land Borders' refers to the approximately 6,000 kilometres of land borders between Belarus, Moldova, Ukraine and the Russian Federation, and the eastern EU countries - Estonia, Finland, Hungary, Latvia, Lithuania, Poland, Slovakia and Romania.

<sup>152</sup> Frontex, *Risk Analysis for 2022/2023*, (Warsaw, 2022); Frontex, *Risk Analysis for 2023/2024*, (Warsaw, 2023); Frontex, *Migratory Routes*, [www.frontex.europa.eu/what-we-do/monitoring-and-risk-analysis/migratory-routes/migratory-routes](http://www.frontex.europa.eu/what-we-do/monitoring-and-risk-analysis/migratory-routes/migratory-routes); Frontex, "Monitoring and risk analysis", [www.frontex.europa.eu/what-we-do/monitoring-and-risk-analysis/migratory-map](http://www.frontex.europa.eu/what-we-do/monitoring-and-risk-analysis/migratory-map), (accessed 14 January 2025).

Article 332 of the Ukrainian Criminal Code criminalizes: “*Illegal movement of persons across the state border of Ukraine, organisation of illegal transportation of persons across the state border of Ukraine, management of such actions or assistance in their commission by advice, instructions, provision of means or elimination of obstacles.*” Dangerous conditions, moving several people, acting as a group and offending by a public official are all considered aggravating circumstances.<sup>153</sup> Offences falling under this provision that involve facilitating the illegal departure of Ukrainian men from Ukraine in violation of martial law provisions would constitute smuggling of migrants according to international law (Smuggling of Migrants Protocol) only if they also involve facilitation of illegal entry into another state, for a financial or other material benefit.

Under Article 332 on “Illegal movement of persons across the state border of Ukraine,” 343 proceedings were processed by first-tier courts in Ukraine in 2022, and 580 in 2023, compared to 96 in 2021. 153 people were convicted under these provisions in 2022 and 268 in 2023. Between January and May 2024, 161 criminal proceedings were initiated against 519 people under Article 332, according to the National Police of Ukraine (NPU).<sup>154</sup>

Ukrainian criminal networks are reported to be involved in facilitating the irregular exit of men from Ukraine in return for a payment.<sup>155</sup> Law enforcement officers in Ukraine had identified around 450 groups assisting men to illegally exit Ukraine outside of official border crossing points for money as of April 2024, according to the SBGS cited in a Ukrinform article.<sup>156</sup> The modus operandi involves identification of clients, who are then taken in groups of between three and 20 people to a pre-arranged location near the land border. They are then escorted across the border or given directions.<sup>157</sup> If the border is along a river, men may be transported by boat or given wetsuits.<sup>158</sup> Some current and former employees of state law enforcement authorities have been involved in committing these offences.<sup>159</sup>

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<sup>153</sup> Criminal Code of Ukraine (Document 2341-III, valid, current version — Revision on September 7, 2024, on the basis - 3902-IX): <https://zakon.rada.gov.ua/laws/show/2341-14>.

<sup>154</sup> Ukraine, Court Statistics website, [https://court.gov.ua/inshe/sudova\\_statystyka](https://court.gov.ua/inshe/sudova_statystyka).

<sup>155</sup> Tihomir Bezlov, Atanas Rusev and Dardan Koçani, *Borderline: Impact of the Ukraine War on Migrant Smuggling in South Eastern Europe*, Center for the Study of Democracy (CSD) and Global Initiative Against Transnational Organized Crime (September 2023), p. 10.

<sup>156</sup> Ukrinform, “Андрій Демченко, речник Державної прикордонної служби” (Translation: Andriy Demchenko, spokesman of the State Border Service” (29 April 2024): [www.ukrinform.ua/rubric-ato/3857901-andrij-demcenko-recnik-derzavnoi-prikordonnoi-sluzbi.html](http://www.ukrinform.ua/rubric-ato/3857901-andrij-demcenko-recnik-derzavnoi-prikordonnoi-sluzbi.html).

<sup>157</sup> National Police of Ukraine, “U Chernivetskii oblasti vykryto orhanizovanu zlochynnu hrupu, yaka nalahodyla masshtabnyi kanal perepravlennia ukhlyantiv do Moldovy” Press Release in a telegram group, (20 November 2023): [https://t.me/UA\\_National\\_Police/16089](https://t.me/UA_National_Police/16089).

<sup>158</sup> National Police of Ukraine, “6000 dolariv SShA za nezakonnyi peretyn kordonu: stolychni politseiski zneshkodyly zlochynnu skhemu” Press Release in a telegram group, (27 October 2023): [https://t.me/UA\\_National\\_Police/15502](https://t.me/UA_National_Police/15502).

<sup>159</sup> Ukraine, DBR, “Na Lvivshchyni sudytmut uchasnykiv zlochynnoi hrupu, yaka perepravlyala viiskovozoboviazanykh za kordon”, press release, (3 October 2022):

<https://dbr.gov.ua/news/na-lvivshhyni-suditimut-uchasnykiv-zlochynnoi-grupi-yaka-perepravlyala-vijskovozoboviazanykh-za-kordon-1>. For example, see: Ukraine, DBR, “DBR vykrylo pravookhorontsia, yakyi orhanizuvav kanal perepravlennia ukhlyantiv do Rumunii”, press release, (9 August 2024):

<https://dbr.gov.ua/news/dbr-vikrilo-pravookhorontsia-yakij-organizuvav-kanal-perepravlennia-uhlyantiv-do-rumunii>.

One case, identified by the NPU in February 2024, involved a criminal actor smuggling men to Moldova across the river Dniester in Vinnytsia oblast (central Ukraine) by taxi and then by boat for the equivalent of US\$8,000. Across the border in Moldova, other members of the group met them and provided safe escort.<sup>160</sup> An unknown number of men in this category managed to exit Ukraine without being intercepted. Between February 2022 and April 2023, at least 30 men died trying to exit Ukraine irregularly, mostly while crossing the Tizsa river (also Tysa, Tisa, which runs along Ukraine's borders with Romania and Hungary), according to the Ukrainian State Border Guard Service (SBGS).<sup>161</sup>

« 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... »

Key informant cited by IOM (2024)<sup>162</sup>

The fees for this type of activity vary. According to the Security Service of Ukraine, fees for facilitating the irregular exit of men out of the country range between US\$3,000 and \$10,000.<sup>163</sup> According to a key informant in Bern, Switzerland, who works with Ukrainian refugees, at the beginning of the war it cost around \$5,000-10,000 for men to cross the border out of Ukraine with a smuggler.<sup>164</sup> According to key informants in Warsaw, Poland, some men try multiple times to cross the border from Ukraine and they pay for each attempt. They cited fees ranging from \$2,000 to \$3,000, depending on the country of final destination in the EU.<sup>165</sup> A Ukrainian woman interviewed in Switzerland estimated that it cost around \$1,000-3,000 for men to cross the Ukraine-Hungary border through the forest.<sup>166</sup>

<sup>160</sup> National Police of Ukraine, "U Kyievi operatyvnyky zatrymaly cholovika, nablyzhenoho do kryminalnoho avtoryteta «Lavasohly-Batumskoho»" Press Release in a telegram group, (23 February 2023): [https://t.me/UA\\_National\\_Police/19235](https://t.me/UA_National_Police/19235).

<sup>161</sup> Ukrinform, "Андрій Демченко, речник Державної прикордонної служби" (Translation: Andriy Demchenko, spokesman of the State Border Service" (29 April 2024): [www.ukrinform.ua/rubric-ato/3857901-andrij-demcenko-recnik-derzavnoi-prikordonnoi-sluzbi.html](http://www.ukrinform.ua/rubric-ato/3857901-andrij-demcenko-recnik-derzavnoi-prikordonnoi-sluzbi.html).

<sup>162</sup> Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons in the context of the war in Ukraine: The case of Poland and Romania*, (2024), p34.

<sup>163</sup> Ukrinform, "За час війни викрили майже 400 груп, які допомагали ухлянтам тікати за кордон" (Translation: During the war, almost 400 groups who helped evaders flee abroad were exposed), 18 March 2024.

<sup>164</sup> Key informant interview 2CH-K-04.

<sup>165</sup> Key informant interview 2PL-K-03.

<sup>166</sup> Key informant interview 2CH-K-03.



## Forged/fraudulent documents and corruption

The Ukrainian National Anti-Corruption Prevention agency (NACP) conducted an analysis of corruption risks in the activities of Army military medical commissions, commissioned by a Presidential Decree in September 2023. One of the key risks identified was *“involvement of military enlistment commission officials in corrupt schemes of illegal transportation of men of military age across the state border of Ukraine.”*<sup>167</sup>

The NACP developed and submitted to the Ukrainian Government in August 2023 an “Action Plan for Eliminating Corruption Risks when Ukrainian Citizens Travel Abroad under Martial Law.” According to the head of the NACP, thousands of criminal proceedings have been opened in Ukraine in relation to illegal border crossings by men.<sup>168</sup> The NACP’s research, presented in October 2022, identified eight ‘illegal and semi-legal’ schemes, including men departing *“through the Shlyach system as a driver or second driver, fictitious documents with information on the removal of conscripts from the military register, letters from state authorities to the State Border Guard Service, illegal benefits to the officials involved, etc.”*<sup>169</sup>

The SBGS detected around 3,300 forged documents being used by men intending to exit Ukraine during 2023.<sup>170</sup> This is slightly less than the 3,800 documents (mostly forged certificates of clearance by a military medical commission) identified in 2022.<sup>171</sup> In these cases, smuggling of migrants would only be constituted in cases where forged or fraudulent travel or ID documents are provided by a third party in return for a fee, with the purpose of facilitating irregular entry to another country.

The SBGS reports that from February to October 2022, around 245 attempts to bribe border guards were recorded, during which officials refused illegal benefits totalling over UAH3.8 million (\$91,600).<sup>172</sup> A Ukrainian woman interviewed for this research in Switzerland estimated the cost of obtaining fraudulent documents for men to leave the country at around \$2,000-4,000.<sup>173</sup>

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<sup>167</sup> National Agency on Corruption Prevention (NACP), “NACP proposes measures to minimize corruption risks in the Military medical commissions”, (27 December 2023).

<sup>168</sup> NACP, “Following NSDC meeting, NACP submits plan to eliminate corruption risks while traveling abroad during war to the Government”, (11 August 2023).

<sup>169</sup> NACP, “Departure from Ukraine abroad under martial law: how to eliminate corruption. The NACP presented the research”, (26 October 2022), <https://nazk.gov.ua/en/news/74914/>. The “Shlyach” system allows for Ukrainian men to travel abroad in order to transport humanitarian aid or cargo for the Ukrainian Army. SBGS is cited in a media article as recording 192,500 Ukrainians departing the country under the *Shlyach* system up to April 2023, of whom 19,000 did not return. Ihor Serov, “Cherez systemu “Shliakh” vtekly za kordon i ne povernulysia maizhe 19 tysiach cholovikiv: nazvano seredniu vartist khabaria”, TSN, (27 June 2023): <https://tsn.ua/exclusive/vtekli-za-kordon-ta-ne-povernulis-mayzhe-19-tis-cholovikiv-nazvano-serednyu-vartist-habarya-2357881.html>. See also: NPU, “Holova DSR Andrii Rubel: Levova chastka shakhraiv na temi viiny – areshtanty SIZO i uviazneni”, (4 June 2024): [www.npu.gov.ua/news/holova-dsr-andrii-rubel-levova-chastka-shakhraiv-na-temi-viiny-areshtanty-sizo-i-uviazneni](http://www.npu.gov.ua/news/holova-dsr-andrii-rubel-levova-chastka-shakhraiv-na-temi-viiny-areshtanty-sizo-i-uviazneni).

<sup>170</sup> Ukraine Media Center (government-supported media platform), “In 2023, border guards uncover 3,300 forged documents used by individuals to cross the border – state border guard service”, (18 January 2024); Key informant interview 2CH-K-04.

<sup>171</sup> Ministry of Internal Affairs of Ukraine, “Майже 3,8 тисячі підроблених документів з початку воєнного стану прикордонники виявили в пунктах пропуску” (Translation: Since the beginning of martial law, border guards have found almost 3.8 thousand forged documents at checkpoints), (13 January 2023).

<sup>172</sup> NACP, “Departure from Ukraine abroad under martial law: how to eliminate corruption. The NACP presented the research”, (26 October 2022), <https://nazk.gov.ua/en/news/74914/>.

<sup>173</sup> Key informant interview 2CH-K-03.

## 5. Trafficking in Persons

### 5.1 Internal trafficking in Ukraine

Trafficking in persons is criminalized under Article 149 of the Ukrainian Criminal Code. In 2022, the Office of the Prosecutor General (OPG) of Ukraine set up a specialized unit for the investigation and prosecution of trafficking in persons cases and, in 2023, a coordination centre for the support of victims and witnesses. Ukraine's interdepartmental working group on trafficking in persons met twice during 2023. The Government adopted a State Social Programme on combating trafficking in persons for the period up to 2025, covering prevention, detection, and protection and assistance of victims. Ukraine has 217 investigators and 212 prosecutors specialized in trafficking in persons cases.<sup>174</sup> Further measures on international cooperation and on access to passports for Ukrainians abroad are detailed in the Annex to this study.

« Some positive developments took place, such that now every community and every district must have an [anti-trafficking] coordination council and an action plan. This is on the positive side. Well, every stick has two ends... »

Key informant from an anti-trafficking NGO in Ukraine, 2024<sup>175</sup>

The same key informant from an NGO in Ukraine indicated that the conflict precipitated increased focus on anti-trafficking and described, for example, how the district [*район/район*] coordination council in which she participates held around 30 working meetings during the period May 2023 to March 2024, identifying 12 potential cases of exploitation.<sup>176</sup> During the course of 2022-2024, various actors in Ukraine implemented information campaigns to prevent trafficking and promote safe migration in the context of the mass displacement.<sup>177</sup>

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<sup>174</sup> Data provided to UNODC by the Office of the Prosecutor General of Ukraine in November 2023.

<sup>175</sup> Key informant interview UA-K-02.

<sup>176</sup> Key informant interview UA-K-02. Since 2020, Ukraine has been divided into 136 districts (*райони*), the second-level administrative subdivision after oblasts (*області*).

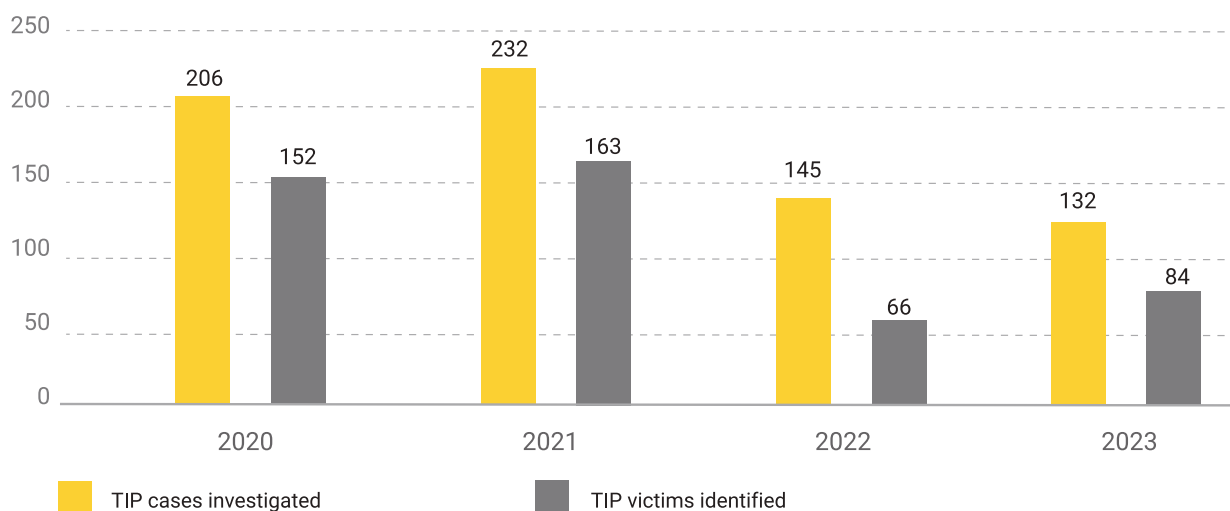
<sup>177</sup> Key informant interview UA-K-03.

The ongoing conflict, however, presents obstacles for the anti-trafficking response, including challenges in recruiting and maintaining staffing for dedicated anti-trafficking organizations and other anti-trafficking stakeholders, and de-prioritization of anti-trafficking due to other concerns. This leads, according to one key informant in Ukraine, to a higher number of potential trafficking victims being identified by NGOs than people officially designated victims by the authorities.<sup>178</sup> According to another key informant in Ukraine, efforts to combat child trafficking and child abduction have also been redirected due to the conflict.<sup>179</sup>

Furthermore, key informants consider that wartime conditions and the difficulty for victim-witnesses of travelling repeatedly to participate in court proceedings, combined with the likelihood of receiving low or no compensation, is likely to result in low levels of cooperation in court proceedings and lower sentences or lack of convictions of offenders.<sup>180</sup>

Indeed, since February 2022, the Ukrainian authorities identified fewer cases of trafficking in persons and fewer victims of trafficking compared to previous years, as shown in Figure 8.

Figure 8: Trafficking in persons (TIP) cases and victims identified by the authorities in Ukraine, 2020-2023



Source: Office of the Prosecutor General (OPG) of Ukraine

<sup>178</sup> *Ibid.*

<sup>179</sup> Key informant interview UA-K-04.

<sup>180</sup> Key informant interview UA-K-03.

The trafficking in persons criminal offences investigated in Ukraine during 2022-2023 involved labour exploitation (49%); sexual exploitation (29%); forced criminal activities (21%); and exploitation in pornography (1%). This marked an increase in the proportion of cases of labour exploitation and forced criminal activities - and a decrease in the proportion of cases of sexual exploitation and exploitation in pornography. In 2020-2021, the forms of trafficking investigated were labour exploitation (38%); sexual exploitation (42%); forced criminal activities (13%); exploitation in pornography (6%), and other forms (removal of organs and exploitation in armed conflict, less than 1%).<sup>181</sup> According to the OPG, the majority of the offences recorded were committed by individuals acting alone.<sup>182</sup>

The cases of trafficking for forced criminal activities involved Ukrainian victims committing drug trafficking offences (as 'couriers') and migrant smuggling offences (as 'sailors') as a result of being trafficked, outside of Ukraine.<sup>183</sup>

Victims of trafficking identified in Ukraine during the period 2020-2021 comprise 55.5 per cent men, 36 per cent women and 8.5 per cent children.<sup>184</sup> In those years, the COVID-19 pandemic significantly reduced capacities to identify victims of trafficking globally. A larger proportion of women victims of trafficking were identified in Ukraine during the period 2022-2023: 43 per cent women, 37 per cent men and 20 per cent children. An additional 22 cases of child trafficking were identified during 2022-2023.<sup>185</sup>

While the figures above relate to criminal investigations of trafficking in persons, for victim protection and assistance, the National Social Service of Ukraine assigned the status of victim of trafficking to 47 people in 2022, 118 people in 2023, and 43 people in the first quarter of 2024. The 118 victims in 2023 had mostly been trafficked for exploitation in armed conflict (55), forced labour (22), forced criminal activities (17) and sexual exploitation (11).<sup>186</sup>

The International Organization for Migration (IOM) assisted 374 victims of trafficking in Ukraine in 2023, 23 per cent of whom were internally displaced people (IDPs). 187 of these victims had been trafficked in 2022 (140) and 2023 (47). They comprised 61 per cent males and 39 per cent females, trafficked mainly for labour exploitation (83%), as well as sexual exploitation (9%), forced criminal activities (3%), exploitation in armed conflict, servitude and forced begging.<sup>187</sup> While most of the 187 victims in 2022-2023 were trafficked within Ukraine (149), 20 were trafficked to Poland and a further eleven to other countries (Italy, Germany, Türkiye, Spain and Czechia).<sup>188</sup> IOM supported an additional 450 people in 2023 who had experienced "forced labour without the signs of human trafficking" since February 2022.<sup>189</sup>

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<sup>181</sup> Data provided to UNODC by the Office of the Prosecutor General of Ukraine in November 2024.

<sup>182</sup> Data provided to UNODC by the Office of the Prosecutor General of Ukraine in November 2023.

<sup>183</sup> Data provided to UNODC by the Office of the Prosecutor General of Ukraine in November 2023. Also mentioned in key informant interview UA-K-01.

<sup>184</sup> Data provided to UNODC by the Office of the Prosecutor General of Ukraine in November 2023.

<sup>185</sup> Data provided to UNODC by the Office of the Prosecutor General of Ukraine in November 2023.

<sup>186</sup> Ukraine, Ministry of Social Policy, "Ukrainci staly chastishe zvertatysia za dopomohoiu u vypadkakh, koly postrazhdaly vid torhivli liudmy", press release, 1 May 2024: [www.msp.gov.ua/news/23691.html](http://www.msp.gov.ua/news/23691.html); key informant interview UA-K-05.

<sup>187</sup> IOM Ukraine. "Trafficking In Persons: IOM Ukraine Caseload (January-December 2023)," (2024).

<sup>188</sup> *Ibid.*

<sup>189</sup> The figures for victims of labour exploitation likely include cases in territories under Russian occupation: IOM Ukraine, "Trafficking in Persons: IOM Ukraine Caseload (January-December 2023)", (Kyiv, IOM Ukraine, 2024); key informant interview UA-K-03.

As regards prosecution, during 2022 and 2023, the Ukrainian authorities dismantled eight organized crime groups committing trafficking in persons, consisting of a total of 31 people, who committed a total of 75 offences, involving 103 victims (70 men and 33 women). Five of the groups were involved in trafficking for labour exploitation and three in trafficking for forced criminal activities, while none were involved in trafficking for sexual exploitation.<sup>190</sup>

At least eight cases of trafficking for forced labour were heard in Ukrainian courts since 24 February 2022, involving treatment centres for people with substance use disorders or other forms of dependency and shelters for homeless people. These residential centres brokered service-users' labour to local businesses, often using charitable organizations as a front.<sup>191</sup> One case of trafficking for forced labour (see Case Study 5 in chapter 7) involved a woman and man residing at an accommodation centre for IDPs, working in agriculture.<sup>192</sup>

Internally displaced adults and children are considered vulnerable to trafficking by key informants in Ukraine,<sup>193</sup> particularly to forced labour.<sup>194</sup> According to one key informant, recruitment of internally displaced adults for trafficking usually involves abuse of a position of vulnerability (as the "means" element of the trafficking offence) and takes place through acquaintances or online.<sup>195</sup> Increased rent in safe regions and inflation as a result of the conflict may have further exacerbated IDPs' vulnerability.<sup>196</sup>

## Court Case – Trafficking for Forced Labour, 2024

A court case on trafficking for forced labour in Ukraine involved an organized criminal group led by an active military serviceman, with four accomplices, operating during 2022-2024 in Dnipro oblast in eastern Ukraine. At transport stops, the trafficking group recruited IDPs and other disadvantaged Ukrainians without a permanent residence for forced labour in unpaid agricultural and construction work, street cleaning and at fresh produce warehouses. The group, under the guise of a charity, promised victims free accommodation, food and paid employment. They then confiscated victims' mobile phones and closely monitored them, using psychological pressure and threats of physical violence. The traffickers coordinated their activities through group chats on a messaging app, where they shared photos of victims. On 27 May 2024, a District Court in Dnipropetrovsk delivered a guilty verdict.<sup>197</sup>

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<sup>190</sup> Data provided to UNODC by the Office of the Prosecutor General of Ukraine in November 2023.

<sup>191</sup> A search of all decisions in the <https://reyestr.court.gov.ua> database for the period 24.02.2022-18.06.2024 was carried out using the following search term: 'ст. 149 КК України реабілітаційний центр торгівля людьми', producing 35 decisions pertaining to eight distinct criminal cases.

<sup>192</sup> The account is based on key informant interview UA-K-02; as well as on court records for criminal case no. 12023140000001007 from 1 September 2023. See the original indictment in: Ukraine, Halych District Court in Lviv City, case no. 461/9758/23, (20 November 2023): <https://reyestr.court.gov.ua/Review/115023810>.

<sup>193</sup> Key informant interviews UA-K-03; UA-K-04; UA-K-05.

<sup>194</sup> Key informant interview UA-K-04.

<sup>195</sup> Key informant interviews UA-K-03; UA-K-05.

<sup>196</sup> Key informant interview UA-K-05.

<sup>197</sup> Ukraine, Amur-Nyzhnodniprovskiy District Court in Dnipro, Case Nr. 199/2273/24. Court decision of 27 May 2024:

<https://reyestr.court.gov.ua/Review/119309319>; and on group members, of 22 March 2024:

<https://reyestr.court.gov.ua/Review/117841193>; Ukraine, OPG, "Verbuvaly ta utrymuvaly v trudovomu rabstvi 50 liudei – u Dnipri zatrymano hrupu osib" (11 January 2024):

[www.gp.gov.ua/ua/posts/verbuvali-ta-utrimuvali-v-trudovomu-rabstvi-50-lyudei-u-dnipri-zatrimano-grupu-osib](http://www.gp.gov.ua/ua/posts/verbuvali-ta-utrimuvali-v-trudovomu-rabstvi-50-lyudei-u-dnipri-zatrimano-grupu-osib).

A key informant from an NGO in western Ukraine had received information mostly on internal trafficking for forced labour since February 2022, but also for sexual exploitation and for exploitation in armed conflict at the frontlines.<sup>198</sup> According to another key informant from an NGO in Ukraine, internal trafficking increased due to the impacts of the conflict. This is partly due to interruptions in the provision of essential services, including social services.<sup>199</sup>

In 2023, the OPG sent an indictment to court against a Ukrainian woman who handed over her children to a 50-year-old man for sexual exploitation, and a man who recruited two children for sexual exploitation was sentenced to 9 and a half years in prison.<sup>200</sup> A recent development highlighted by another key informant from an NGO in Ukraine is the increased incidence of online sexual exploitation of women using webcams, with the women also being sexually exploited physically, particularly in southern Ukraine.<sup>201</sup>

According to a key informant from a state authority, low levels of child trafficking were recorded in Ukraine prior to 2022. In 2019, 50 cases were recorded of children involved in criminal activities and begging, and seven of child trafficking. Criminal gangs used children as pickpockets and forced them to join the gangs through intimidation and physical violence; in 2020, this indicator dropped to zero.<sup>202</sup>

Orphaned children are particularly vulnerable to trafficking in the context of the war. One potential trafficking case described by a key informant from a Ukrainian NGO involved a teenage girl who had been orphaned, whose employer refused to pay her wages. The key informant considered that the employer was abusing her position of vulnerability as an orphan lacking a support network.<sup>203</sup>

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<sup>198</sup> Key informant interview UA-K-02.

<sup>199</sup> Key informant interview UA-K-03.

<sup>200</sup> Data provided to UNODC by the Office of the Prosecutor General of Ukraine in November 2023.

<sup>201</sup> Key informant interview UA-K-03.

<sup>202</sup> Key informant interview UA-K-04.

<sup>203</sup> Key informant interview UA-K-03.

## 5.2 Incidence of cross-border trafficking of people who fled Ukraine

Based on a comprehensive analysis of the primary and secondary sources for this study, detections of cases of trafficking in persons involving people who fled Ukraine have increased in European countries. Data on trafficking in persons cases provided to UNODC by countries hosting Ukrainian refugees indicate the number of Ukrainians identified as victims of trafficking in persons in 2022. The numbers of Ukrainians recorded as victims of trafficking increased in 2022 compared to the years before the full-scale invasion. This increase took place in a context where the numbers of Ukrainians residing in the EU and the rest of Europe has massively increased since early 2022. In 2021, Ukrainians comprised 0.35% of the entire EU population; by the end of 2022, they comprised 1.24%.<sup>204</sup>

This section presents indications of the prevalence of trafficking across Europe among people who fled Ukraine since early 2022, with a specific focus on the countries under study: Germany, Poland and Switzerland. The indications of a relatively low prevalence of trafficking in persons may be due to the fact that it takes time for cases of trafficking to be identified and recorded by national authorities. It may also be because of underreporting for a variety of reasons, challenges in detecting trafficking, lack of understanding of available legal frameworks and remedies by criminal justice actors and stigma attached to being a victim of trafficking, factors that may be particularly relevant in trafficking for sexual exploitation. The 2022 data may not, therefore, reflect the full extent of trafficking committed in that year. Most official data on trafficking for 2023 and 2024 was not yet available at the time of writing.

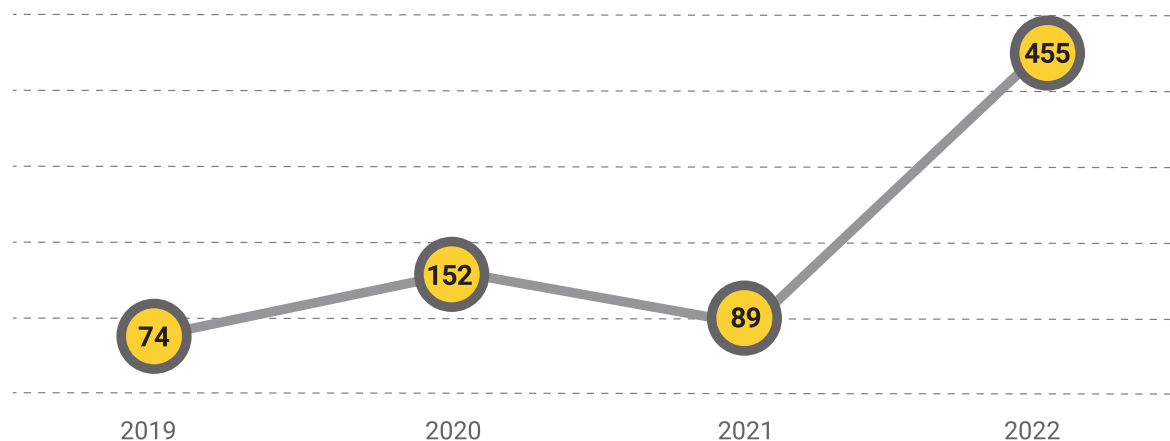
These low figures nonetheless offer a tentative indication that the incidence of trafficking among Ukrainians is limited, and that visa-free travel and temporary protection (as analysed in section 2.2 above) and massive prevention of smuggling of migrants (section 4.1 above), together with extensive anti-trafficking measures (section 2.3 above), have effectively mitigated the risks of trafficking in persons in this context.<sup>205</sup>

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<sup>204</sup> Calculations based on: Eurostat, "Population and population change statistics", (6 July 2024), (accessed 9 August 2024).

<sup>205</sup> Ella Cockbain and Aiden Sidebottom, *The war in Ukraine and associated risks of human trafficking and exploitation: Insights from an evidence-gathering round table*, (April 2022).

Figure 9: Ukrainian victims of trafficking identified globally, 2019-2022



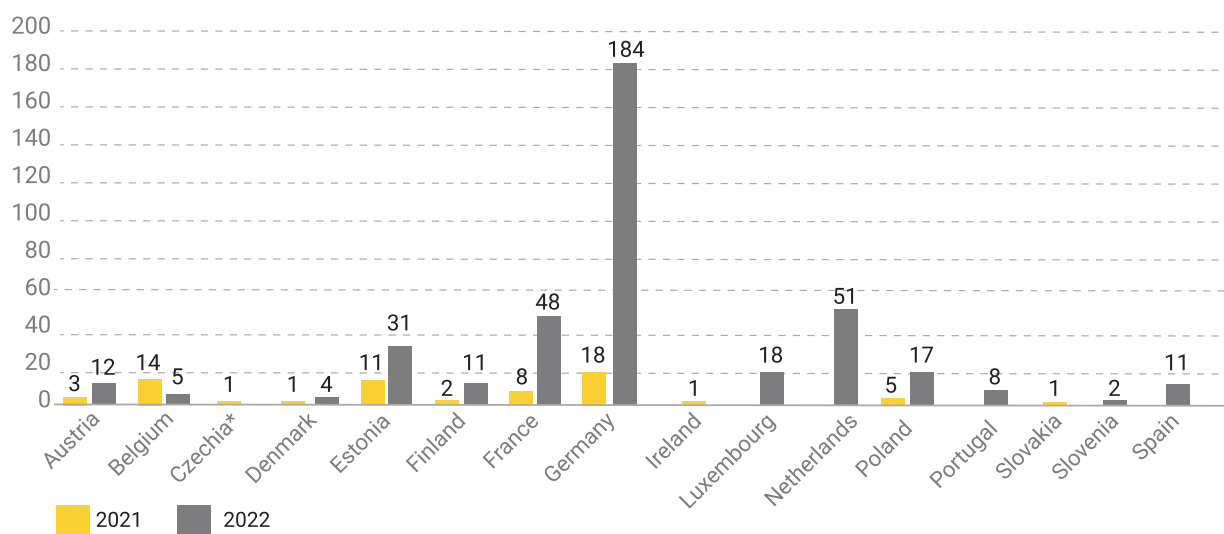
Source: UNODC elaboration based on national data – GLOTIP Database

According to data submitted by Member States to UNODC, during 2019-2021, a total of 315 Ukrainian victims of trafficking were identified globally, 139 (44%) of them in EU countries. During the first year after the full-scale invasion, **455 Ukrainian victims of trafficking were recorded around the world**, 402 (88%) of them in EU countries and a further 33 (7%) in the UK.

In 2022, the first year of the large-scale displacement from Ukraine, **402 Ukrainian victims of trafficking were identified across EU Member States**, comprising 206 women, 192 men and four people of unidentified gender. For comparison, 65 Ukrainian victims were identified in the EU in 2021, 38 in 2020 and 36 in 2019. The majority of the Ukrainian victims recorded in 2022 are adults trafficked for forced labour. Most were identified in Germany (184), the Netherlands (51), France (48), Estonia (31), Luxembourg (18) and Poland (17). In 2021, most Ukrainian victims were identified in Germany (18), Belgium (14), Estonia (11), France (8) and Poland (5) (see Figure 10 below). 53 Ukrainian victims were identified in 2022 outside of the EU: 33 in the UK and the remainder in Israel and Türkiye.



Figure 10: Number of Ukrainian victims of trafficking identified in the EU, 2021 vs. 2022



Source: UNODC elaboration based on national data – GLOTIP Database \*Figures for Czechia in 2022 not available

## Poland

277 potential victims of trafficking were recorded by the Polish National Public Prosecutor's Office in 2022, of whom 180 were from outside the EU. The non-EU victims comprised mostly Latin Americans, as well as **17 Ukrainians trafficked for forced labour or services**.<sup>206</sup> Fourteen Ukrainian victims were assisted by the Polish National Intervention and Consultation Centre (NICC) for victims of human trafficking in 2022, of a total of 254 people assisted.<sup>207</sup>

The Polish Government's *Human Trafficking Report for 2022* includes data from various sources. Polish National Police data indicate that in 2022, 31 potential victims of human trafficking of all nationalities were identified in 20 proceedings, with 15 people charged (under Article 189a, sections 1-2 of the Polish Penal Code). The potential victims comprised 19 women and 12 men. While 11 were Polish citizens, nine were Ukrainian and 11 were from other countries. 13 people were exploited in forced labour or services, 12 in prostitution or pornography (sexual abuse material), three in begging and three in other forms of exploitation.<sup>208</sup> In 2022, a decision was issued to file criminal charges for trafficking in persons under Article 189a, section 1 of the Penal Code against one Ukrainian citizen who exploited people in begging, which was unrelated to the war in Ukraine.<sup>209</sup>

<sup>206</sup> Eurostat, *Annual Report on Migration and Asylum 2022 Statistical Annex*, (Luxembourg, Publications Office of the European Union, 2023); Ministry of the Interior and Administration Republic of Poland, *Human Trafficking Report: Human trafficking is a crime 2022*, (2023).

<sup>207</sup> Ministry of the Interior and Administration Republic of Poland, *Human Trafficking Report*, (2023).

<sup>208</sup> *Ibid.*

<sup>209</sup> Information provided to UNODC by Permanent Mission of Poland to the United Nations Office and the International Organisations in Vienna on 31 October 2024.

In the course of its official activities in 2022, the Polish Border Guard (PBG) identified 110 potential victims of trafficking, 58 in 2023 and 66 in 2024 (as of 24 October 2024). The identified victims are mainly people from Latin American countries trafficked for forced labour. In 2022, among the identified victims was one Ukrainian citizen exploited in domestic servitude, unrelated to the war in Ukraine.<sup>210</sup>

The PBG has not identified any potential victims of trafficking among those fleeing Ukraine since early 2022. Due to the suspension of voluntary returns to Ukraine by IOM, no Ukrainian citizens were returned from Poland to their country of origin under the Programme for Support and Protection of Victims-Witnesses of Human Trafficking in 2022. The PBG investigated a case in 2022 involving forced labour of Ukrainian and Moldovan citizens.<sup>211</sup> The relevant proceedings had been initiated in 2020 and are unrelated to the full-scale invasion of Ukraine.<sup>212</sup>

The Polish National Police reports additional cases of potential trafficking in persons in 2023-2024 involving Ukrainian refugees. One case, identified in 2023, involved two Ukrainian girls, both aged 17 years old, who fled to Poland in early 2022, and were sexually exploited in prostitution.<sup>213</sup> Another case identified in May 2024 involved the exploitation of a 43-year-old Ukrainian woman and her 10-year-old son in forced labour on a farm in Poland. The perpetrators also took the benefits the Ukrainian family were entitled to as refugees.<sup>214</sup>

A number of cases of Ukrainians exploited in illegal cigarette factories have been identified in recent years in EU countries, including Poland, Spain and Italy, both prior to and since February 2022.<sup>215</sup> Cigarette trafficking in Eastern Europe and the EU, and illicit cigarette production in Ukraine, have shifted in response to the war and the obstacles at seaports, with production moving to EU countries.<sup>216</sup>

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<sup>210</sup> *Ibid.*

<sup>211</sup> Ministry of the Interior and Administration Republic of Poland, *Human Trafficking Report: Human trafficking is a crime 2022*, (2023).

<sup>212</sup> Information provided to UNODC by Permanent Mission of Poland to the United Nations Office and the International Organisations in Vienna on 31 October 2024.

<sup>213</sup> Group of Experts on Action against Trafficking in Human Beings (GRETA), *Evaluation Report Poland: Third evaluation round: Access to justice and effective remedies for victims of trafficking in human beings*, (June 2023).

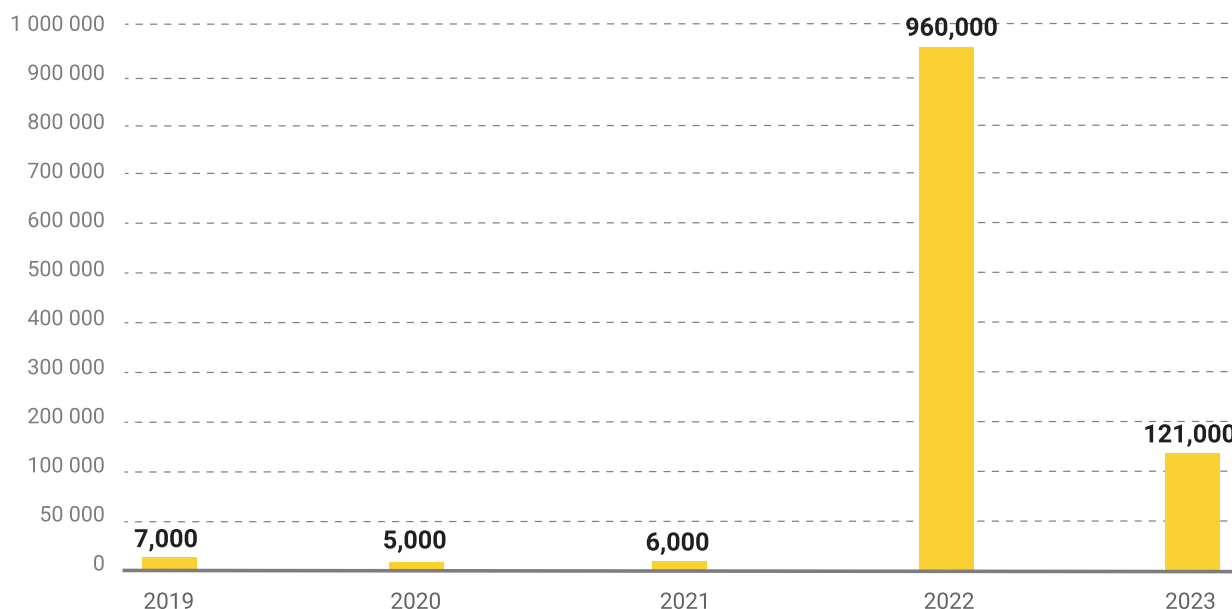
<sup>214</sup> Information provided to UNODC by Permanent Mission of Poland to the United Nations Office and the International Organisations in Vienna on 31 October 2024.

<sup>215</sup> For example, see ANSA, "Italy: Ukraine refugees exploited in counterfeit cigarette plant", InfoMigrants, (18 April 2022).

<sup>216</sup> Yulia Krylova, "The Impact of Russia's Full-Scale Invasion on Illicit Cigarette Trafficking from Ukraine to the European Union", *Journal of Illicit Economies and Development*, vol. 6, no. 2 (2024), pp.1–18.

## Germany

Figure 11: Net Immigration of Ukrainians to Germany, 2019-2023



Source: Germany, Federal Statistical Office

**184 Ukrainian victims of trafficking were recorded in Germany in 2022**, compared to 18 in 2021. However, at least 101 of the victims recorded in 2022 were in fact trafficked prior to 2022 (see Trafficking for forced labour case in section 5.3 below), with the investigation completed and referred to the prosecutor in 2022. The German statistics on trafficking in persons are based on the number of investigations completed and referred to the relevant public prosecutor's office during 2022 by the Criminal Police Offices of the Länder, the Federal Criminal Office (BKA), the Federal Police and the Financial Control of Undeclared Work Unit of the Customs Administration. The statistical data on victims do not provide information on whether a prosecutor has brought charges or on the outcome of pending court proceedings.<sup>217</sup>

These numbers should also be qualified by the fact that during the period 2022-2023, the Ukrainian population in Germany increased more than eight-fold. At the end of 2021, there were 138,000 Ukrainians residing in Germany, comprising 0.2 per cent of the country's population; by the end of 2023, there were 1.15 million, comprising 1.4 per cent of the population. In 2022, the net migration of Ukrainians to Germany was 962,000 people (1.1 million arrived and 138,000 people left) and in 2023 it was 121,000 (277,000 people arrived and 156,000 left).<sup>218</sup>

<sup>217</sup> Information provided to UNODC by the German Statistical Office, June 2024.

<sup>218</sup> Germany, Federal Statistical Office, "Nettozuwanderung von 121 000 Menschen aus der Ukraine im Jahr 2023" (Translation: Net immigration of 121 000 people from Ukraine in 2023), press release, 22 February 2024.

According to key informants interviewed for this research in Germany in 2023, there were no trafficking in persons cases before the courts involving people who fled Ukraine after February 2022.<sup>219</sup> The authorities had “only scattered reports and investigations initiated on forced prostitution, trafficking in persons, and other kinds of exploitation [...] and just one case that was confirmed. The situation has not changed since the beginning of the war.”<sup>220</sup>

Based on their consultations with 35 anti-trafficking organizations across the country in late 2022, the national umbrella organization of anti-trafficking services in Germany (Bundesweite Koordinierungskreis Gegen Menschenhandel e.V., KOK) considers that it is difficult to ascertain the actual number of cases of trafficking and exploitation in Germany as a result of the war in Ukraine. Around half the 35 organizations that reported to KOK had provided advice to or referred for assistance people who had fled Ukraine in Germany. At the time of the survey, the organizations consulted were aware of less than ten cases of suspected trafficking in persons involving people who fled Ukraine.<sup>221</sup>

The anti-trafficking services were providing support in around 15 cases of labour exploitation and in less than 30 cases of sexual exploitation.<sup>222</sup> According to KOK, this number of cases is in line with Europol’s preliminary estimates, that as of October 2022, there were around 60 suspected trafficking cases and five officially confirmed trafficking cases across Europe.<sup>223</sup>

A state agency working on combating trafficking for forced labour in Berlin runs a project for people who fled Ukraine. Key informants from the agency, interviewed in 2023 and 2024, stated that they had seen a very low number of cases of forced labour or exploitation among Ukrainians and no cases of trafficking in persons.<sup>224</sup> According to other key informants interviewed in Berlin in 2023, severe forms of labour exploitation have not been identified among people who fled Ukraine.<sup>225</sup> However, in an interview in 2024, the same key informants stated that the number of Ukrainians exploited in the workplace is increasing, as more Ukrainian people enter the labour force.<sup>226</sup>

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<sup>219</sup> Key informant interviews 1DE-K-08; 1DE-K-07.

<sup>220</sup> Key informant interview 1DE-K-07.

<sup>221</sup> KOK, *Menschenhandel und Ausbeutung im Kontext des Ukrainekrieges – Eine Untersuchung aus Sicht spezialisierter Fachberatungsstellen zur Situation in Deutschland* (Translation: Trafficking in Persons and Exploitation in the context of the war in Ukraine – Perspectives from help centers about the situation in Germany), (October 2022).

<sup>222</sup> KOK, *Menschenhandel und Ausbeutung im Kontext des Ukrainekrieges*, (October 2022), op. cit.

<sup>223</sup> Information from EUROPOL: Public Information- Reported potential THB incidents as of 27.10.2022 at the event “EU Civil Society Platform”, cited in KOK, *Menschenhandel und Ausbeutung im Kontext des Ukrainekrieges*, (October 2022), op. cit.

<sup>224</sup> Key informant interviews 1DE-K-02; 2DE-K-01.

<sup>225</sup> Key informant interview 1DE-K-09.

<sup>226</sup> Key informant interview 2DE-K-01.

## Switzerland

The Swiss authorities reported **two Ukrainian victims of trafficking in Switzerland in 2022**, though it is unclear whether these two people arrived in the country before or after February 2022.<sup>227</sup> During 2022, the protection programme for victims of trafficking in German-speaking parts of Switzerland supported 375 people of all nationalities, of whom 209 were newly identified in 2022. Thirteen of the newly identified cases in 2022 involved Ukrainian citizens.<sup>228</sup>

The Specialized Centre for Trafficking in Women and Women in Migration (Fachstelle Frauenhandel und Frauenmigration, FIZ) identified 259 of these people as victims of trafficking in persons, comprising 224 females, 22 males and 13 people of diverse gender. The victims in 2022 were exploited in sex work (195), in the household/care sector (28), in other sectors (21) and in other forms of trafficking (15). Fourteen of the cases were in Bern, while 45 were in Zurich, 62 were abroad and 67 were unknown.<sup>229</sup> During 2023, 156 new cases were recorded by FIZ, less than four of which involved Ukrainians.<sup>230</sup>

A key informant from FIZ, interviewed for this research in 2024, said that the organization had identified two Ukrainian victims of trafficking in Bern and two in other cantons.<sup>231</sup> Other key informants interviewed in Bern, including NGOs and case workers, agreed that the incidence of exploitation was low. According to a key informant from an NGO in Bern, herself a Ukrainian refugee, cases of abuse or exploitation are “*very, very rare*.”<sup>232</sup>

As of early 2025, the Swiss Federal Police had not recorded the identification of any victims of trafficking from Ukraine since the beginning of the full-scale invasion. Police in the canton of Geneva in western Switzerland, close to the French border, were conducting a preliminary investigation, not connected to the arrival of Ukrainian refugees since 2022, relating to a Ukrainian man who had been resident in Switzerland for several years and who had been arrested and interrogated in the past on suspicion of “*illegally bringing Ukrainian women into the country for the purpose of prostitution*.”<sup>233</sup>

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<sup>227</sup> Key informant interview 1CH-K-12.

<sup>228</sup> Fachstelle Frauenhandel und Frauenmigration (FIZ), *Jahresbericht 2022*, (2023).

<sup>229</sup> *Ibid.*

<sup>230</sup> Fachstelle Frauenhandel und Frauenmigration (FIZ), *Jahresbericht 2023*, (2024).

<sup>231</sup> Key informant interview 2CH-K-07.

<sup>232</sup> Key informant interview 1CH-K-11.

<sup>233</sup> Data and information provided to UNODC by the Swiss Federal Police, via the Swiss Federal Department of Foreign Affairs, on 31 January 2025.

## Rest of the EU

After Germany, the highest number of Ukrainian victims identified in Europe in 2022 was in the Netherlands. According to the Dutch National Report on Trafficking in Persons, the number of notifications about Ukrainian victims increased from seven in 2021 to 51 in 2022. 49 of the cases in 2022 were assumed to be labour exploitation. The victims comprise 33 women and 18 men, exploited in agriculture, forestry and fishing, with smaller numbers in construction, industry and hospitality. Ukrainians were the third largest group of foreign victims identified in the Netherlands.<sup>234</sup>

From February 2022 to January 2024, the Dutch Coordination Centre against Trafficking in Persons (CoMensha - Coördinatiecentrum tegen Mensenhandel) recorded four criminal trafficking in persons investigations initiated that involved Ukrainians, each involving one victim. Two cases were trafficking for sexual exploitation and two were for forced labour. Three of these cases have since been closed and not submitted for prosecution, while one was filed for prosecution under assault rather than trafficking in persons.<sup>235</sup>

A Dutch NGO working on labour law violations, labour exploitation and trafficking for forced labour supported 396 cases involving Ukrainians during the period 24 February 2022 to 30 June 2024. In the NGO's assessment, around 153 of these cases had potential indicators of trafficking in persons. The potential trafficking victims are 217 women, 165 men and 14 of unknown gender.<sup>236</sup> Most complaints to a Dutch NGO working on labour rights involving Ukrainians related to people being not paid or being paid less than promised, working with no contract or with fraudulent self-employment contracts, false promises, problems regarding occupational health and unfair dismissals.<sup>237</sup>

A statistical report on administrative data indicates that the proportion of Ukrainians among victims of trafficking identified in France increased from two per cent in 2021 to nine per cent in 2022.<sup>238</sup> France recorded 48 Ukrainian victims of trafficking in 2022. The French Red Cross, responsible for the reception of Ukrainians in many parts of France, reported attempts at train stations to recruit young Ukrainian women with deceptive employment offers, as well as indications of deprivation of liberty and withholding of documents at private and collective accommodation. Law enforcement authorities consider this trafficking by individual actors - particularly accommodation hosts -, rather than organized crime groups.<sup>239</sup>

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<sup>234</sup> National Rapporteur on Trafficking in Human Beings and Sexual Violence against Children, *Annual figures: Human Trafficking 2022* (The Hague, 2023); data and information provided to UNODC by the Dutch Ministry of Justice and Security on 7 November 2024.

<sup>235</sup> Key informant interview NL-K-01.

<sup>236</sup> Data and information provided to UNODC by the Dutch Ministry of Justice and Security on 7 November 2024; key informant interview NL-K-02.

<sup>237</sup> Data and information provided to UNODC by the Dutch Ministry of Justice and Security on 7 November 2024.

<sup>238</sup> France, Ministry of Justice, *La traite et l'exploitation des êtres humains en 2022: une approche par les données administratives*, (Translation: Human trafficking and exploitation in 2022: an administrative data approach), (2023).

<sup>239</sup> Service statistique ministériel de la sécurité intérieure (Ministerial Statistical Service of Interior Security, SSMSI) and Mission interministérielle pour la protection des femmes contre les violences et la lutte contre la traite des êtres humains (Interministerial Mission for the Protection of Women from Violence and Combatting Trafficking in Human Beings (MIPROF), *La traite des êtres humains en France: Le profil des victimes accompagnées par les associations en 2022*, (Translation: Trafficking in Human Beings in France: Profile of victims supported by associations in 2022), (2023).

According to the Eurostat and European Migration Network (EMN) *Annual Report on Migration and Asylum*, during 2022, five countries reported Ukrainians among the top three nationalities of non-EU victims of trafficking identified: Bulgaria, Czechia, Estonia, Luxembourg and Sweden.<sup>240</sup> In Luxembourg, the majority of non-EU victims of trafficking identified in 2022 were from Russia (21) and Ukraine (20), almost all adult women trafficked for sexual exploitation.<sup>241</sup> According to FRA in 2023, the NGO La Strada in Czechia had recorded 123 cases of labour exploitation of people with temporary protection status.<sup>242</sup>

A case reported by the media in Italy was identified early on in the conflict, in April 2022. The case involved ten victims, some of whom were Ukrainian refugees, exploited in unsafe conditions at a factory producing counterfeit cigarettes near the capital, Rome.<sup>243</sup> There were 19 suspected trafficking cases involving Ukrainians in Austria during April to July 2022, and “several” suspected trafficking cases in Slovenia. Three complaints on the trafficking of Ukrainian refugees for sexual exploitation or forced labour were being investigated by the Spanish police in Madrid in late 2022.<sup>244</sup> A case involving the potential trafficking for sexual exploitation of 14 Ukrainian and Belarusian women was identified by the Spanish police in southern Spain in May 2024<sup>245</sup> (see section 5.4 below on trafficking for sexual exploitation).

The Swedish police recorded 11 suspected trafficking cases involving Ukrainian refugees, for sexual exploitation and forced labour, in late 2022, and had also “come across Ukrainian women who had been forced into prostitution after fleeing Ukraine. [...M]any of them come to Sweden through agencies based in Ukraine that had taken up to 50% of their income.”<sup>246</sup> Other suspected trafficking cases were reported to Europol in 2022 from across the EU, involving suspected Ukrainian traffickers recruiting Ukrainians for forced labour, forced begging and child trafficking, particularly in the context of illegal adoption and commercial surrogacy (see section 5.5 below on cross-border child trafficking).<sup>247</sup>

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<sup>240</sup> Eurostat, *Annual Report on Migration and Asylum 2022 Statistical Annex*, (Luxembourg, Publications Office of the EU, 2023).

<sup>241</sup> *Ibid.*

<sup>242</sup> FRA, *Fundamental rights implications for the EU of the war in Ukraine*, (Luxembourg, Publications Office of the EU, 2023).

<sup>243</sup> ANSA, “Italy: Ukraine refugees exploited in counterfeit cigarette plant”, InfoMigrants, (18 April 2022).

<sup>244</sup> FRA, *The Russian war of aggression against Ukraine – the broad fundamental rights impact in the EU: Bulletin #2*, (Luxembourg, Publications Office of the EU, 2022).

<sup>245</sup> Spain, Ministry of the Interior, “Desarticulada una organización criminal dedicada a la explotación sexual de mujeres del este de Europa” (Translation: Criminal organisation dedicated to the sexual exploitation of women from Eastern Europe dismantled), press release, (21 June 2024); Europol, “5 arrests for sexual exploitation of Ukrainian refugees in Spain”, press release, (21 June 2024).

<sup>246</sup> FRA, *The Russian war of aggression against Ukraine* (2022), op. cit.

<sup>247</sup> Content analysis of Europol Monitoring Team Reports (EPMT) March – November 2022. Europol Unclassified – Basic Protection Level.

## 5.3 Cross-border trafficking for forced labour

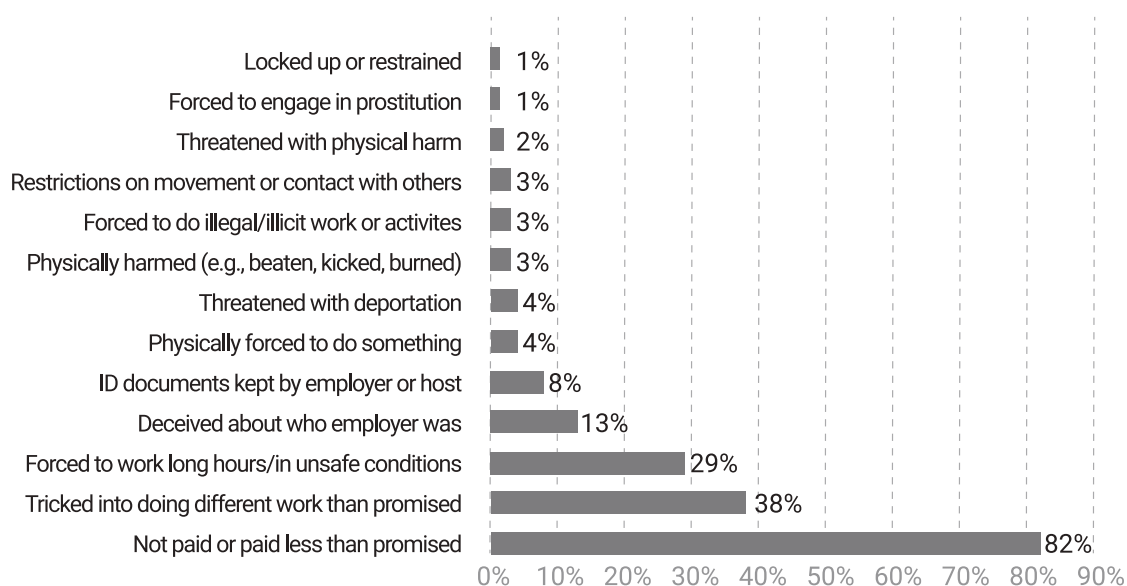
### Incidence of forced labour and types of abuses

Among 1,602 people who fled Ukraine and were surveyed for this research in 2023 in Warsaw, Poland (609), Bern, Switzerland (593) and Berlin, Germany (400), a number of respondents reported indications of abuse or exploitation that could present elements of trafficking in persons for forced labour. Nine per cent of respondents (138) had themselves experienced or witnessed other people from Ukraine having problems at work or in the context of their accommodation since arriving in the country of survey. These problems range from indicators that a person is being trafficked to general abuse and harm, and were reported by survey respondents in Warsaw (75), Bern (36) and Berlin (27).

The majority of these respondents cited problems related to finding accommodation and discrimination while seeking employment or at the place of employment. In Warsaw, most of these problems arose in the workplace (91%). In Bern on the other hand, 70 per cent of these problems were in the context of accommodation and in Berlin, 61 per cent were accommodation and 44 per cent cited the workplace (multiple responses possible). Potential abuse and exploitation in the accommodation context related to paid and unpaid working arrangements in exchange for accommodation. Some of these reported issues presented possible indicators of trafficking in persons.

Six per cent (104/1,602) of respondents cited some form of abuse in the workplace. Around half of these respondents experienced or witnessed just one form of abuse (49%), while the remainder experienced or witnessed two (27%) or three (17%) forms of abuse. Seven per cent experienced four or more forms. Figure 12 below presents the types of abuses experienced in the workplace.

Figure 12: Abuses Experienced or Witnessed in the Workplace



Source: 2023 survey of 1,602 people who fled Ukraine in Berlin, Warsaw and Bern



35 out of 1,602 respondents – two per cent - reported that they themselves experienced or had witnessed other people who fled Ukraine experiencing abuses at the workplace that present indicators of potential cases of trafficking in persons for the purpose of forced labour.<sup>248</sup> The majority (32) were surveyed in Warsaw. In six of these cases, workers had their personal identity documents kept by their employer, among other abuses. In four cases, workers were threatened with being deported by their employer, and/or were forced to do something against their will. In three cases, they were forced to do illegal or illicit work activities. A further three were harmed at the workplace, and/or prevented from moving around freely or speaking to people, and one was locked up or restrained.

Most indications referred to situations witnessed rather than directly experienced by the respondents and are thus not indicative of prevalence among the survey respondents. The potential cases mainly involved non-payment of wages or payment being less than promised; deception in relation to the type of work; excessive working hours or unsafe working conditions; and deception about who the employer was. Smaller numbers of respondents reported threats of being physically harmed or being deprived of sleep, food, water or medical care, or restrictions on liberty (withholding of ID documents; threats of being deported; and being prevented from moving freely or contacting relatives), in similar proportions

In parallel research on behalf of the Anti-Trafficking Taskforce for Ukraine, which UNODC co-chairs, IOM carried out surveys with 190 Ukrainian refugees in Poland in late 2023, as part of a special module on abuse, violence and exploitation of IOM's regular displacement tracking matrix (DTM) surveys. Thirteen per cent of respondents reported experiencing abuse, violence or exploitation during their journey or in receiving countries. This mostly comprised working without getting the expected payment, an indicator of trafficking for forced labour (10.5% of respondents; n=20).<sup>249</sup>

Smaller numbers of respondents in Poland mentioned other indicators of potential abuse, violence or exploitation: receiving an offer of marriage (5), experiencing physical violence (4) or being deceived, manipulated or indebted to travel or move (2). Two respondents reported that they were forced to perform work or other activities against their will and one respondent did not always have their travel documents with them. No respondents were kept at a location against their will, forced to travel to a new location, or personally knew anyone who had been identified as a victim of trafficking by national authorities.<sup>250</sup>

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<sup>248</sup> This includes respondents who reported at least two types of abuses at the workplace (out of 12 possible options), including at least one of the following: "Someone was physically forced to do something", "Someone was locked up or restrained", "Someone was physically harmed (e.g., beaten, slapped, hit, kicked, punched, burned)", "Someone was prevented from moving around freely or speaking to people", "Someone's ID documents were kept by their employer or host", "Someone was threatened with being deported", "Someone was threatened with being physically harmed", "Someone was forced to do illegal or illicit work or activities", "Someone was forced to perform sexual acts" and "Someone was forced to engage in prostitution".

<sup>249</sup> Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons in the context of the war in Ukraine: The case of Poland and Romania*, (IOM, 2024).

<sup>250</sup> *Ibid.*

For victims of all nationalities, during 2022, the German Federal Criminal Office (BKA) recorded 34 cases of labour exploitation (an increase of 21% compared to 2021), involving 1,019 victims (+593%) and 76 suspects (+46%) (51 men, 24 women and 1 adult of unknown gender). At least 101 of the victims were Ukrainian and involved in the case described below. The relevant provisions of German Criminal Law are: trafficking in persons (section 232 of the Criminal Code); forced labour (section 232b of the Criminal Code) and labour exploitation (sections 233 and 233a of the Criminal Code). Under section 233, exploitative conditions include low payment, excessive working hours, excessive commission fees and rent, dangerous working conditions and withholding of wages.<sup>251</sup>

### Trafficking in persons involving Ukrainian victims in Germany, 2020-2022

The German Federal Criminal Police Office (Bundeskriminalamt, BKA) describes a case of trafficking for forced labour that was investigated in 2020 and referred to the public prosecutor's office in 2022. The criminal network had been active across the country providing employees for drinks logistics companies in Nordrhein-Westfalen (western Germany) and other German Länder. The employees were brought to Germany through deception and then exploited through complex chains of subcontractors. The recruitment company charged inflated amounts for providing immigration papers, accommodation and transportation to workplaces and the employees were paid a very low salary.

The members of the criminal group exercised a division of roles within a highly professionalized structure. In 2021, search and arrest warrants were issued against company bosses, on suspicion of trafficking in persons for the purpose of labour exploitation, withholding or embezzlement of wages, tax fraud and benefit fraud. The investigation indicated a total of 555 potential victims. At least 224 were exploited in drinks logistics. The nationalities of 397 of the victims were determined; 101 were from Ukraine, while the remainder were from other Eastern and Central European countries.<sup>252</sup>

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<sup>251</sup> Germany, Bundeskriminalamt (Federal Criminal Police Office), *Menschenhandel und Ausbeutung: Bundeslagebild 2022*, (Translation: Human Trafficking and Exploitation: Federal Crime Report), (2023).

<sup>252</sup> *Ibid.*

## Sectors of exploitation

Respondents to the survey carried out for this research in Berlin, Warsaw and Bern were working in agriculture, the civil service, construction, domestic work, transportation, finance and information technologies (IT). According to key informants interviewed for this research in Warsaw, forced labour of refugees from Ukraine takes place in warehouses, factories, construction, other types of manual work, cleaning and care services.<sup>253</sup> Respondents to IOM's survey in Poland who reported experiencing abuse, violence or exploitation were working in sectors like domestic work, agriculture, transportation and logistics, hospitality and the services sector, administration and professional services and manufacturing and construction.<sup>254</sup>

The case of a Ukrainian woman in her late forties from eastern Ukraine, who was trafficked for forced labour in Poland in 2022 by a Ukrainian female acquaintance, was recorded by IOM. She worked packing frozen meat in cold storage, had been deceived about the nature of the work and the payment, worked excessive hours, lacked access to means of communication and had her personal documents withheld, and was living in substandard conditions.<sup>255</sup>

According to a state agency working on combating trafficking for forced labour in Berlin: *"Before the war, there were a number of cases of labour exploitation of Ukrainian people in a number of sectors (construction, agriculture); they were very numerous."*<sup>256</sup> As of 2022, the same key informants from this agency consider the sectors most at risk for forced labour of Ukrainian refugees to be care work, cleaning, agriculture and hospitality.<sup>257</sup> The few potential cases of forced labour indicated by interviewees in Bern were in restaurants and hotels, care work, cleaning and domestic work, and agriculture (see, for example, Case Study 4 in chapter 7).<sup>258</sup>

Potential cases of labour exploitation or trafficking for forced labour of refugees from Ukraine in the research countries involve cleaning work in private households and hotels, often linked to the provision of accommodation. According to a key informant, in Warsaw in 2022 it was common for hotels or hostels to offer rooms free-of-charge, and refugees were asked to provide cleaning services in return, without any pay.<sup>259</sup> Ukrainians in private accommodation in Poland are vulnerable because of power imbalances vis-à-vis hosts (see section 2.4 above), according to UNHCR, leading to: *"expectations among hosts (i.e. for domestic work). While participants reported feeling obliged to perform domestic work, the extent to which such work was coerced was not elaborated."*<sup>260</sup>

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<sup>253</sup> Key informant interviews 2PL-K-03; 2PL-K-04.

<sup>254</sup> Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons in the context of the war in Ukraine: The case of Poland and Romania*, (IOM, 2024).

<sup>255</sup> IOM Ukraine. "Trafficking In Persons: IOM Ukraine Caseload (January-December 2023)," (2024).

<sup>256</sup> Key informant interview 1DE-K-02.

<sup>257</sup> Ibid.

<sup>258</sup> Key informant interview 2CH-K-02.

<sup>259</sup> Key informant interview 2PL-K-04.

<sup>260</sup> UNHCR, *Surviving as We Can: Risks of Gender Based Violence (GBV), and Sexual Exploitation and Abuse (SEA), Relating to Private and Collective Accommodation, Livelihoods, and Accessibility, for Persons Fleeing Ukraine: Poland Summary Report*, (October 2023).

A key informant from an anti-trafficking NGO in Berlin described how a Ukrainian woman was offered accommodation in a private household and then instructed to carry out domestic work, and her movement was restricted.<sup>261</sup> A similar case reported to the German anti-trafficking umbrella organization, KOK, involved a Ukrainian woman who was forced into domestic servitude by her accommodation host and was not allowed to leave the house at certain times.<sup>262</sup>

As of early 2025, police in the canton of Vaud, in western Switzerland, close to the border with France, were investigating a foreign couple who had offered accommodation to Ukrainian women in return for them carrying out maintenance work on their luxury property. The couple allegedly misappropriated the refugees' social assistance benefits and forced them to work under abusive conditions.<sup>263</sup> A key informant interviewed in 2023 in Bern also mentioned an accommodation provider requiring Ukrainian tenants to clean apartments: *"It was an owner who has many apartments for tourists, and he said the girls [two young Ukrainian women] should be cleaning all the houses, not just the one they were living in."*<sup>264</sup>

Another key informant from an NGO, interviewed in Bern in 2024, described how a Ukrainian woman had called the NGO for assistance because her daughter had applied for a job with a man who was looking for domestic workers on social media. The man had hinted that he would also expect sexual services. The NGO informed the local police, who went and checked this person and determined that he was attempting to exploit job applicants.<sup>265</sup>

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<sup>261</sup> Key informant interview 1DE-K-04.

<sup>262</sup> KOK, *Menschenhandel und Ausbeutung im Kontext des Ukrainekrieges*, (October 2022), op. cit.

<sup>263</sup> Data and information provided to UNODC by the Swiss Federal Police, via the Swiss Federal Department of Foreign Affairs, on 31 January 2025.

<sup>264</sup> Key informant interview 1CH-K-09.

<sup>265</sup> Key informant interview 2CH-K-06.

## Labour law violations

« It is very difficult to see where it is simply poor working conditions and where exploitation actually begins. »

Trafficking specialist from a Swiss authority, interviewed in 2023<sup>266</sup>

A key informant from a Berlin NGO interviewed in 2024 had not come across incidents of forced labour or trafficking, but reported that labour law violations among people who fled Ukraine in the city seem widespread, which may leave refugees more vulnerable to trafficking for forced labour.<sup>267</sup> Among the issues identified in the SAM-UKR survey of Ukrainian refugees in 2022-2023 were: earning less than a living wage; excessive working hours; demanding physical labour; abusive practices by employers; and potential for scams.<sup>268</sup>

Key informants in all three cities mentioned situations where Ukrainians refugees are not paid for their work; experience significant delays in payment; are paid less than national employees for the same work; experience poor working conditions; and are not given proper employment contracts.<sup>269</sup> One key informant interviewed described a case where two Ukrainian women complained about their employer, a business-owner running a storage facility, who had not paid them for two or three months. When they confronted the employer, the situation escalated into a physical conflict.<sup>270</sup>

The Polish Act on Assistance of Ukrainian Citizens foresees that to hire a Ukrainian citizen, employers can simply register the employment relationship with the Labour Office and no prior authorization is required.<sup>271</sup> However, an issue raised by key informants in Warsaw, that leaves refugees from Ukraine - as well as other workers - vulnerable to forced labour, is working under a civil-law contract (see section 2.4 above), or working without a contract.<sup>272</sup>

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<sup>266</sup> Key informant interview 1CH-K-12.

<sup>267</sup> Key informant interview 2DE-K-01.

<sup>268</sup> OECD and EUAA, *Voices in Europe*, (2024), op. cit., p. 50.

<sup>269</sup> Key informant interviews 2PL-K-02; 2PL-K-04; 2CH-K-02; 1PL-K-07; 2DE-K-06; 1DE-K-09; KOK, *Menschenhandel und Ausbeutung im Kontext des Ukrainekrieges*, (October 2022), op. cit.

<sup>270</sup> Key informant interview 2DE-K-06.

<sup>271</sup> Key informant interviews 1PL-K-01; 1PL-K-04.

<sup>272</sup> Key informant interviews 2PL-K-01; 2PL-K-02; 2PL-K-04; 2PL-K-05; 1PL-K-07; Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons*, (2024), op. cit.

« [Refugees] sometimes work under civil law contracts, for which the rule that applies is the civil code and not the labour code. It creates space for exploitation because in those contracts you can put any stipulation, for instance if you come to work late, I can pay you 100 PLN [US\$25] less. »

Key informants from an international organization in Poland, interviewed in 2023<sup>273</sup>

A key informant from an NGO, interviewed in 2024, described Ukrainians in vulnerable situations, including adults and children, working without proper contracts at hotels and at a football stadium.<sup>274</sup> In Bern, according to a key informant interviewed in 2024, many Ukrainians work without a contract because of the bureaucracy attached to hiring someone with Protection Status S (temporary protection).<sup>275</sup> One Ukrainian woman working at a construction company was told by her employer that she should work 20 per cent more than her colleagues because she had Protection Status S, but that she would receive the same salary, according to a key informant.<sup>276</sup>

Key informants for the Anti-Trafficking Task Force research also mentioned Ukrainian refugees experiencing exploitative conditions – including being underpaid or earning less than national employees and working without formal contracts.<sup>277</sup> Similarly, most complaints to a Dutch NGO working on labour rights involving Ukrainians related to people not being paid or being paid less than promised, working with no contract or with fraudulent self-employment contracts, health issues and unfair dismissals.<sup>278</sup>

The role of labour intermediaries was considered a specific vulnerability factor by two key informants in Warsaw (see, for example, Case Study 3 in chapter 7).<sup>279</sup> A key informant interviewed in 2024 referred to people looking for work in EU countries before leaving Ukraine, through recruitment companies, which may deceive applicants about the nature of the job opportunity.<sup>280</sup> A key informant in Berlin mentioned the issue of employment of refugees through leasing companies. This can lead to lower wages than agreed and make it easier to terminate the contract without notice.<sup>281</sup>

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<sup>273</sup> Key informant interview 1PL-K-07.

<sup>274</sup> Key informant interview 2PL-K-01.

<sup>275</sup> Key informant interview 2CH-K-03.

<sup>276</sup> Key informant interview 2CH-K-03.

<sup>277</sup> Regional Refugee Response for the Ukrainian Situation (IOM), *Vulnerability to Trafficking in persons in the context of the war in Ukraine*, (2024), *op. cit.*; Key informant interviews 2PL-K-02; 2PL-K-03.

<sup>278</sup> Key informant interview NL-K-02.

<sup>279</sup> Key informant interviews 2PL-K-03; 2PL-K-05.

<sup>280</sup> Key informant interview 2PL-K-03.

<sup>281</sup> Key informant interview 1DE-K-09.

## 5.4 Cross-border trafficking for sexual exploitation

### Demand

« If you look on the internet, for example, pornography sites, the demand for refugee porn or Ukrainian porn has simply increased dramatically. [...] you would certainly find more women from Ukraine on erotic escort sites. »

Key informant from an anti-trafficking NGO in Berlin, interviewed in 2024<sup>282</sup>

In the early months of the mass displacement of refugees from Ukraine, there were indications of a significant increase in online demand among European men for sexual services and pornography from Ukrainian women - some of which may involve sexual abuse and exploitation - and for child sexual abuse and exploitation of Ukrainian children.<sup>283</sup> The Organization for Security and Co-operation in Europe (OSCE) cites Thomson Reuters data indicating “*huge spikes in online searches – across multiple languages and countries - for explicit content and sexual services from Ukrainian women and girls.*”<sup>284</sup> The risks of online sexual exploitation and abuse are linked to Ukrainians’ regular use of messaging apps and social media to seek support and the resulting opportunity for sex traffickers to recruit victims and advertise exploitative sexual services online.<sup>285</sup>

Social workers interviewed for this research in Bern in 2023 suggested that the pre-existing high demand for buying sex from Eastern European women has increased since February 2022.<sup>286</sup> A key informant from a women’s shelter in Berlin also pointed to demand for sex work from Ukrainian women, particularly online, as a factor of vulnerability.<sup>287</sup>

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<sup>282</sup> Key informant interview 2DE-K-09.

<sup>283</sup> Key informant interview IN-K-01.

<sup>284</sup> Organization for Security and Co-operation in Europe (OSCE), *Recommendations on enhancing efforts to identify and mitigate risks of trafficking in human beings online as a result of the humanitarian crisis in Ukraine*, 22 April 2022. On internet-based trafficking, see also UNODC, *Global Report on Trafficking in Persons 2020*, Chapter 5, (United Nations Publications, 2020).

<sup>285</sup> Key informant interviews 2PL-K-05; EUAA, IOM and OECD, *Forced displacement from and within Ukraine: Profiles, experiences, and aspirations of affected populations*, (October 2022).

<sup>286</sup> Key informant interview 1CH-K-03.

<sup>287</sup> Key informant interview 1DE-K-11.

## Sexual exploitation in prostitution

« *The crime networks existed before. This is a pre-existing factor for potential sexual exploitation. It has occurred within Ukraine, and outside of Ukraine, and victims from Ukraine have been trafficked to Europe and Dubai [United Arab Emirates]. Given the context, the risks are huge, but the scale is unknown.* »

Key informants from an international organization, interviewed in Warsaw in 2023 <sup>288</sup>

This study has found some indications of sex work and prostitution involving women who fled Ukraine in the cities under research. The reported incidence of potential sexual exploitation and risky situations in the context of sex work and prostitution was lower than the incidence of potential forced labour and labour rights violations among refugees from Ukraine. Indications of prostitution or sex work among refugees from Ukraine were mentioned by 2.5 per cent of respondents to the survey.

Knowledge of the involvement of other refugees in prostitution or sex work was mentioned by four per cent of survey respondents in Berlin (15 respondents), two per cent in Warsaw (14) and two per cent in Bern (12). Key informants also mentioned Ukrainian women involved in prostitution and sex work. Without further details, it is difficult to determine whether such involvement presents indications of trafficking for sexual exploitation, but some cases do show indications of high levels of vulnerability, as set out below.

Of the 41 respondents who mentioned knowing Ukrainians involved in prostitution and sex work, seven considered the prostitution to be forced, six of them in Warsaw. This means that 0.4 per cent of respondents reported knowledge of people in forced prostitution (potentially trafficking for sexual exploitation in prostitution). None of the 1,602 respondents to the survey reported personally experiencing sexual exploitation. This should be interpreted with caution as it is an issue that is likely to be underreported in victimization surveys and in general, due to various factors, including shame, stigma and lack of awareness of what constitutes sexual exploitation.

Among the survey respondents who knew of forced prostitution cases, two reported that the person in question had been forced to engage in prostitution by their accommodation provider, two did not know by whom and one said by friends. A further two people, who both clarified that the person in question had subsequently worked independently on pornography websites, stated that the perpetrator was “other” and did not provide further details.

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<sup>288</sup> Key informant interview 1PL-K-07.



In response to a question posed in the Berlin Senate, between February 2022 and August 2023, the Berlin Police had investigated six suspected cases of forced prostitution of Ukrainian women. The Berlin Police had been notified of a total of 62 potential cases involving Ukrainians during that period.<sup>289</sup> KOK, the umbrella organization of German anti-trafficking NGOs, was aware of less than 30 cases of sexual exploitation of Ukrainian women around the country.<sup>290</sup> Key informants from an NGO working with women and girls in Berlin noted a minor increase in the number of potential cases of sexual exploitation they identified among Ukrainian women at the time of the interview for this research in mid-2023.<sup>291</sup>

Key informants interviewed in Warsaw in 2023, including authorities, NGOs and international organizations, had documented few cases of trafficking for sexual exploitation among people who fled Ukraine.<sup>292</sup> A key informant interviewed in Warsaw in 2024 mentioned that some Ukrainian refugee women, including Ukrainian Roma women, were offered deceptive job opportunities in Poland, which ended up being in prostitution.<sup>293</sup>

During 2022, the protection programme for victims of trafficking in German-speaking parts of Switzerland supported 13 newly identified cases involving Ukrainians. Further details on these cases are not available, but among 259 people of all nationalities identified by FIZ as victims of trafficking in persons, 86.5 per cent were female, 8.5 per cent were male and 5 per cent were of diverse genders. 75 per cent were exploited in sex work.<sup>294</sup> The Swiss authorities reportedly paid specific attention to Ukrainians working at brothels at the beginning of the crisis, as risks of sexual exploitation were identified as a major concern. The police had identified Ukrainian sex workers before the crisis but did not identify any new sex workers from Ukraine in brothels during the period February 2022 to April 2023.<sup>295</sup>

A key informant from a Berlin NGO, interviewed in 2023, mentioned potential cases involving Ukrainian women looking for work, who were put in touch with intermediaries. These intermediaries discouraged them from registering for temporary protection and social welfare, and instead offered them opportunities in sex work and prostitution. Some of these women were officially registered as sex workers and some were not, and some of the women were recruited in Ukraine. Reportedly the intermediaries also confiscated their passports and pressured them to take clients. However, the key informants could not provide details of any specific cases: *“The exploiters are from Ukraine, they are not big networks. Individuals get in touch through knowing somebody and then recruitment happens through acquaintances, but there are no big groups.”*<sup>296</sup>

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<sup>289</sup> Marius Gerards, “Zwangsprostitution von Ukrainerinnen: Berliner Polizei ermittelt gegen mutmaßliche Menschenhändler” (Translation: Forced prostitution of Ukrainian women: Berlin police investigate suspected human traffickers), *Tagesspiegel*, (6 October 2023).

<sup>290</sup> KOK, *Menschenhandel und Ausbeutung im Kontext des Ukrainekrieges*, (October 2022), *op. cit.*

<sup>291</sup> Key informant interview 1DE-K-04.

<sup>292</sup> Key informant interviews 1PL-K-01; 1PL-K-06; 1PL-K-07.

<sup>293</sup> Key informant interview 2PL-K-05.

<sup>294</sup> FIZ, *Jahresbericht 2022 (2023)*, *op. cit.*; key informant interview 2CH-K-07.

<sup>295</sup> Key informant interviews 1CH-K-01; 1CH-K-12.

<sup>296</sup> Key informant interview 1DE-K-04.

Ukrainian journalists interviewed in Warsaw in 2023 had identified job offers in Poland implying the provision of sexual services in locations such as massage parlours. When the journalists answered some of those offers as part of their investigation, they were reportedly free to leave when they realized the sexual nature of the job. However, in a few cases, the journalist was offered a contract abroad, with travel expenses covered. This included several non-disclosure agreements but no real explanation of the position.<sup>297</sup>

« One Ukrainian woman told me she wanted to start working at a massage parlour. It was proposed like a normal job, but when they came to the interview, the people there said: 'we are not interested in your certificate and skills but your body.' When she gets a contract, there is nothing about guarantees, payment, etc., but only about a confidentiality agreement. She could not talk about the place. »

Journalists interviewed in Warsaw in 2023<sup>298</sup>

Large accommodation centres in the cities where field research was carried out presented specific indications of sexual exploitation, as well as risks of sexual exploitation and abuse. There were indications of abusive and exploitative situations at the first arrival centre for refugees in Tegel (a decommissioned airport) in northwest Berlin. According to a key informant interviewed in 2023, groups and chats on messaging apps were set up for young Ukrainian women residing at the centre to offer sexual services. Refugees are accommodated at Tegel for between a few days and a few weeks, while their temporary protection registration is being processed.<sup>299</sup>

A key informant interviewed in Ukraine in 2024 reported a potential case of trafficking of young Ukrainian women who fled to a country in Eastern Europe, for sexual exploitation at a brothel.<sup>300</sup> Similar cases were reported by the media in July 2022, when the Ukrainian authorities investigated a suspected case of sex trafficking of at least ten Ukrainian women abroad. The National Police of Ukraine (NPU) intercepted a 21-year-old Ukrainian woman, allegedly being trafficked for sexual exploitation in prostitution. The investigation led to the arrest of a suspected trafficking organizer in Kyiv, Ukraine. The 30-year-old man allegedly led a group of men who moderated channels on a messaging app to recruit victims.<sup>301</sup>

<sup>297</sup> Key informant interview 1PL-K-03.

<sup>298</sup> *Ibid.*

<sup>299</sup> Key informant interview 1DE-K-07.

<sup>300</sup> Key informant interview UA-K-02.

<sup>301</sup> Lorenzo Tondo, "Ukraine prosecutors uncover sex trafficking ring preying on women fleeing country", *The Guardian*, (7 July 2022).

## Trafficking for sexual exploitation in southern Spain

The Spanish National Police, supported by Europol, investigated a criminal group trafficking mostly Ukrainian women, but also Belarusian women, for sexual exploitation in prostitution in El Ejido in the province of Almeria in southern Spain. The women were recruited online with false job offers, promising work in Spain as hostesses or entertainers. The criminal network used the services of online agencies specialized in providing women to clubs in Spain for prostitution. On arrival in Spain, the Ukrainian women were instructed by the group to apply for temporary protection. They were then sexually exploited in prostitution at a brothel in El Ejido. The victims were accommodated in three locations managed by the same person who managed the brothel.

The case came to the attention of the Spanish authorities when it was reported to the Victims of Trafficking in Human Beings Service of the National Police. Five suspects were arrested (one Spanish, two Ukrainian and two Russian) in May 2024, including the alleged leader of the group, and fourteen victims were identified. The Police seized two vehicles, €2,495 (US\$2,670) in cash, phones and documents. The suspects are accused of crimes related to prostitution, crimes against foreign citizens' rights and against workers' rights, and membership of a criminal organization. The investigation was ongoing as of June 2024.<sup>302</sup>

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<sup>302</sup> Spain, Ministry of the Interior, "Desarticulada una organización criminal dedicada a la explotación sexual de mujeres del este de Europa" (Translation: Criminal organisation dedicated to the sexual exploitation of women from Eastern Europe dismantled), press release, (21 June 2024); Europol, "5 arrests for sexual exploitation of Ukrainian refugees in Spain", press release, (21 June 2024).

## Risks in the context of sex work and prostitution

Sex work is legal in the three cities covered by the research, though according to a key informant, it has not been cantonal practice for the Bern authorities to authorize this for people with temporary protection status.<sup>303</sup> According to the German Federal Statistical Office, as of the end of 2023, 30,635 people were officially registered for prostitution work across the country, including 1,760 people in Berlin.<sup>304</sup>

Risk factors for sexual exploitation in prostitution are evident from the sources analysed for this research.<sup>305</sup> A key informant from an NGO in Berlin, interviewed in 2024, had conducted 11 outreach visits in brothels, where they met a total of 150 women, 38 of whom were Ukrainian. These Ukrainian women generally did not speak German and were not aware of their rights. Most lived at the brothels, and some were monitored by security guards on cameras. The key informant mentioned two 'erotic massage parlours' (see, for example, Case Study 1 in chapter 7) that almost exclusively employ women from Ukraine: *"When we go there, there's almost always a woman who is there for the first time. [...] Suddenly it was almost all Ukrainian women or one from Moldova, but also of Ukrainian origin, and so on."*<sup>306</sup>

« As soon as the [Ukrainian women] leave the camp, they can do whatever they want. If I see another car taking them alone, I start thinking, another one doing this. [...] They are self-assigned, I cannot see any organization behind it. »

Manager of an accommodation centre in Bern, interviewed in 2023<sup>307</sup>

Several key informants mentioned Ukrainian women becoming involved in sex work and prostitution - including online -, and transactional sex, due to their urgent need for accommodation and the difficulty of finding work in other sectors (see, for example, Case Studies 1 and 2 in chapter 7).<sup>308</sup> A report by UNHCR in Poland on risks of gender-based violence and sexual exploitation and abuse highlighted the power imbalance between refugees and providers of accommodation as a key risk.<sup>309</sup>

<sup>303</sup> Key informant interview 2CH-K-07.

<sup>304</sup> Germany, Federal Statistics Office (Destatis), "Gültig angemeldete Prostituierte in Deutschland am 31.12.2023 nach Bundesländern" (Translation: Validly registered prostitutes in Germany on 31.12.2023, by federal state), (12 July 2024): [www.destatis.de/DE/Themen/Gesellschaft-Umwelt/Soziales/Prostituiertenschutz/Tabellen/prostitutionstaetigkeit2023.html](http://www.destatis.de/DE/Themen/Gesellschaft-Umwelt/Soziales/Prostituiertenschutz/Tabellen/prostitutionstaetigkeit2023.html).

<sup>305</sup> Key informant interviews 2DE-K-5; 2DE-K-07; 2DE-K-08; 2DE-K-09; 2PL-K-01; 2PL-K-05; 1CH-K-03.

<sup>306</sup> Key informant interview 2DE-K-08.

<sup>307</sup> Key informant interview 1CH-K-03.

<sup>308</sup> Key informant interviews 2PL-K-01; 2PL-K-05; 2DE-K-05; 2DE-K-07; 2DE-K-09; 1CH-K-03.

<sup>309</sup> UNHCR, *Surviving as We Can*, (October 2023), *op. cit.*

## 5.5 Cross-border child trafficking

While no children were interviewed or surveyed for this research, key informants mentioned indications of potential hazardous child labour<sup>310</sup> and child trafficking. For example, a group of Ukrainian children were reportedly working on farms close to an accommodation centre in Poland, and in construction, exposed to extreme temperatures and dangerous equipment (see also Case Study 4 in chapter 7).<sup>311</sup>

Other key informants mentioned teenage Ukrainian girls carrying out domestic work for host families or for their own family members in coercive conditions.<sup>312</sup> Another key informant had observed Ukrainian children aged around 12-14 years begging, with donation boxes with a Ukrainian flag and documents indicating the organizations they were purportedly collecting money for - not legally registered charities.<sup>313</sup>

In March 2022, the Hague Conference on Private International Law (HCCH) called for a prohibition on inter-country adoptions from Ukraine because of the conflict-related cross-border displacement.<sup>314</sup> A key informant from a state authority in Ukraine considered that cross-border trafficking for illegal adoption and sale of children had decreased because of the increased difficulty of crossing Ukraine's air, land and sea borders.<sup>315</sup>

However, there are indications of cross-border trafficking for illegal adoption from Ukraine. One case that was prosecuted involved a former school principal at an orphanage in Zakarpattia oblast in western Ukraine, who convinced an impoverished woman in Zhytomyr oblast in northwest Ukraine to sell her infant boy to him for around US\$5,000.<sup>316</sup> The State Migration, Border Guard and Security Services of Ukraine investigated the case and the man was arrested by the NPU in June 2023, just after he had crossed the border into Slovakia, together with the woman and her baby.<sup>317</sup> The man was using documents identifying him as a volunteer from a charity, with authorization in the *Shlyach*<sup>318</sup> system to exit Ukraine. He had planned to give the woman the money after exiting Ukraine, and he intended to sell the baby in an EU country for \$25,000. Criminal proceedings under article 149 (trafficking in persons) of the Ukrainian Criminal Code were initiated.<sup>319</sup>

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<sup>310</sup> Hazardous child labour is defined in article 3 of ILO Convention No. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, 1999, as: “work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.” See: Halshka Graczyk, Towards the urgent elimination of hazardous child labour, (ILO, 2018).

<sup>311</sup> Key informant interview 2PL-K-05.

<sup>312</sup> Key informant interviews 1CH-K-10; 1CH-K-11.

<sup>313</sup> Key informant interview 2PL-K-01.

<sup>314</sup> Information Note from the Permanent Bureau of the HCCH, “Children deprived of their family environment due to the armed conflict in Ukraine: Cross-border protection and intercountry adoption”, (16 March 2022). The HCCH is an intergovernmental organization with the mandate to work on the harmonization of the rules of private international law in the area of international family and child protection law, among other areas.

<sup>315</sup> Key informant interview UA-K-04.

<sup>316</sup> *Ibid.*

<sup>317</sup> Ukraine, Ministry of Internal Affairs, NPU, “Поліція Закарпаття затримала чоловіка, який намагався купити у матері 11-місячну дитину та продати за 25 тисяч доларів в родину з Європи (Translation: Transcarpathian police detained a man who tried to buy an 11-month-old child from his mother and sell it for 25 thousand dollars to a family from Europe), (26 June 2023).

<sup>318</sup> The “Shlyach” system allows for Ukrainian men to travel abroad in order to transport humanitarian aid or cargo for the Ukrainian Army. See section 4.2 on Paying for facilitation of irregular border crossing by Ukrainian men.

<sup>319</sup> Ukraine, Ministry of Internal Affairs, NPU, (26 June 2023), *op. cit.*

In the early months of the war, the European Parliament expressed concern about the risks of trafficking of women and babies for surrogacy and illegal adoption, calling on:

*“the EU and its Member States to pay particular attention to the protection of surrogate mothers during pregnancy, childbirth and puerperium and to respect all of their rights, as well as those of the newborns” and stressing “the cross-border implications of this practice, as has been the case for the women and children affected by the war against Ukraine.”*<sup>320</sup>

Surrogacy is legal in Ukraine and has continued since February 2022. As an indication of the extent of surrogacy in the country, the CEO of one of the largest companies providing surrogacy services in Ukraine is quoted in an April 2023 media article stating that around 30 babies had been born per month at their clinics through surrogacy since the beginning of 2022 – equating to around 360 babies born through surrogacy per year.<sup>321</sup> In 2022, the Ukrainian authorities reported to Europol about a criminal network operating in Ukraine and the EU, facilitating illegal adoptions for EU nationals through surrogacy programmes.<sup>322</sup>

According to a key informant in Ukraine, Ukrainian law enforcement identified an organized group of 12 traffickers in mid-2023, operating in Kyiv and Kharkiv, who induced women to become pregnant in order to sell the babies in countries where surrogacy is prohibited. The women were recruited in impoverished locations that had been recently liberated by Ukrainian forces, paid around €7,000 (\$7,640) for one baby and threatened and intimidated. They were either subjected to artificial insemination from a donor or implanted with a fertilized embryo. The organized crime group received €50-70,000 (\$55-76,000) per baby and was made up of doctors, other medical staff, administrators and a lawyer. Ukrainian law enforcement prevented the removal of one child abroad, confirmed the removal of seven more children, and was investigating around 40 more cases.<sup>323</sup>

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<sup>320</sup> European Parliament, European Parliament Resolution on the impact of the war against Ukraine on women (2022/2633(RSP)), (5 May 2022).

<sup>321</sup> Anette Dowideit, Dmytro Drabik, Ilya Gridneff, Emily Schultheis, and Alfred Hackensberger, “Die Babyfabrik von Kiew” (Translation: The baby factory of Kyiv), *Welt*, (6 April 2023).

<sup>322</sup> Content analysis of Europol Monitoring Team Reports (EPMT) March – November 2022. Europol Unclassified – Basic Protection Level.

<sup>323</sup> Key informant interview UA-K-04.

## 6. Conclusions and Policy Implications

The mass displacement of Ukrainians and others across borders and within the country, in response to the full-scale invasion of Ukraine in February 2022 and the ongoing war, triggered an unprecedented refugee protection response. The refugee response in EU and non-EU European countries – maintaining visa-free entry for refugees from Ukraine and facilitating rapid access to temporary protection or equivalent legal residence statuses – largely prevented smuggling of migrants. This was in a situation where over 6.7 million people from Ukraine sought refuge abroad.

Regular journeys due to visa-free travel, and the resulting low levels of migrant smuggling, combined with rapid access to the rights attached to temporary protection status, ensure that refugees from Ukraine remain resilient to exploitation and trafficking in persons. Targeted information campaigns, increased efforts to identify victims of trafficking, law enforcement cooperation and other anti-trafficking policies and actions by state and non-state actors, in Ukraine and in countries of transit and destination, may have further strengthened resilience. The findings of this research suggest that these responses contributed to preventing and mitigating trafficking in persons in the context of the conflict in Ukraine.

Certain vulnerabilities remain, however. The specific situation of Ukrainian men subject to martial law and mobilization provisions prohibiting their departure from the country makes them more likely to engage migrant smugglers to facilitate their journeys if they decide to travel to a country of refuge. Such men may cross Ukraine's borders at an unofficial land border crossing point, to evade interception by the Ukrainian authorities, and enter another country unofficially, usually across rivers or mountains. Others use fraudulent or fraudulently obtained documents to qualify for an exemption from the departure ban and cross at official border crossing points.

Both situations may involve engagement with criminal actors to facilitate irregular exit from Ukraine, but migrant smuggling according to international law is only committed if a third party facilitates irregular entry to another country or provides fraudulent travel documents for the purposes of irregular entry.

This research identified a limited – though significant – incidence of Ukrainian men paying for facilitation of irregular border crossings, with considerable sums of money changing hands (around US\$1,000-10,000 per person). This is an issue that requires a tailored response, to ensure that this criminal industry can be dismantled, and a legal, policy and protection response that ensures safety for refugee men who experience these dangerous journeys.

Ukraine has a comprehensive legal, policy and institutional framework for combating trafficking in persons. The Government has placed an increased focus on the issue since February 2022, though the ongoing war poses obstacles and challenges. The numbers of identified cases of internal trafficking for forced labour, forced criminal activities and exploitation in armed conflict have increased, while the overall number of trafficking cases identified in Ukraine has decreased.

Many identified and potential cases of trafficking in persons victimize internally displaced people (IDPs) and residents at accommodation centres for vulnerable groups, such as drug-users, homeless people and orphaned children. Some trafficking cases involve organized groups operating under the guise of charitable organizations serving humanitarian needs. Children from Ukraine are particularly vulnerable to trafficking for forced labour, domestic servitude and illegal adoption, both in Ukraine and abroad. Surrogacy continues to take place in Ukraine, which presents vulnerabilities to trafficking for expectant mothers, other young women and for infants.

The humanitarian and protection response should be supported and expanded in Ukraine, particularly for groups especially at risk of trafficking, including children, IDPs and residents at accommodation centres for vulnerable groups. The capacity of Ukrainian anti-trafficking stakeholders needs to be supported and built to ensure that domestic and cross-border trafficking can be effectively identified and referred, including forms of trafficking specific to or exacerbated by the war. Ukrainian stakeholders should be supported to protect children from forced labour, domestic servitude and illegal adoption, and to identify and refer potential cases.

Precarious employment situations in host countries make refugees from Ukraine vulnerable to trafficking for forced labour. Refugees may work without a contract or with a contract that does not adequately protect their labour rights. They may be underpaid or not paid at all, or have their rights further eroded through sub-contracting or labour intermediaries. Indications of forced labour are concentrated in certain sectors, such as domestic work, cleaning, agriculture and factory work. Online tools such as social media and messaging apps may be used to recruit refugees for forced labour.

Monitoring and enforcing the labour rights of refugees from Ukraine in host countries is of crucial importance, ensuring that risks of trafficking for forced labour are mitigated and potential cases are identified and referred, with a particular focus on sectors such as domestic work, cleaning, agriculture and factory work.

The provision of accommodation to Ukrainian refugees by private hosts – often free-of-charge - has been a welcome demonstration of solidarity in general, but the relationship of dependency between refugees and their hosts has been abused by some hosts for the purposes of labour exploitation and sexual abuse. Systems for the provision of accommodation to refugees by private hosts should be regulated and monitored to ensure that individual accommodation providers do not abuse the situation of dependency of refugees on their hosts for the purposes of forced labour or sexual exploitation.

The involvement of Ukrainian refugee women in prostitution and sex work in host countries also presents indications of vulnerability and sexual exploitation. This research uncovered several potential cases of trafficking for sexual exploitation in prostitution, a phenomenon that is likely to be underreported. There are also risks of sexual exploitation in online prostitution and sex work, linked to high internet usage among the refugee population and demand from men in host countries. The situation of Ukrainians sexually exploited in host countries – offline and online – should be given proper attention to ensure that risks of trafficking are mitigated, and potential cases of sexual exploitation are immediately identified and referred.



While the overall figures for the incidence of smuggling of migrants and trafficking in persons in the context of displacement due to the war in Ukraine remain relatively low as of the time of writing, there may be many reasons for non-reporting, underreporting or delayed reporting of trafficking cases. Data and information that become available after the publication of this study may alter the picture. This underlines the urgency of continuing to monitor smuggling and trafficking affecting refugees from Ukraine, and trafficking of IDPs and others in Ukraine, to ensure that the war does not claim additional victims of abuses, and that smuggling and trafficking as potential forms of war profiteering are prevented.

The continuation of the legal and policy framework of maintaining visa-free travel and rapid access to temporary protection - most recently extended in the EU at the time of writing until March 2026 - together with the comprehensive anti-trafficking response, can hopefully continue to mitigate the risks of trafficking in persons and smuggling of migrants, though more attention should be given to vulnerable groups. These measures also show significant potential for adaptation and application to other refugee displacements and migration movements in Europe and elsewhere.

## 7. Case Studies

### Case Study 1 – Ukrainian woman's experience of sexual exploitation at a massage parlour in Berlin, Germany

**Olena\*** is a young woman from Kyiv who moved to Warsaw a few years before 2022, learned Polish, had a job and was accepted for a university programme:

*"On 23 February 2022, I talked with my mom. They called me early in the morning, they thought that something had started."*

It became more difficult to rent accommodation in Warsaw after February 2022 and Olena could not work full-time, as she had a student residence permit. She dropped out of university and lived in shared flats while she waited for her application for a work permit and permanent residence status to be processed. It was repeatedly rejected. She decided to move to Berlin and apply for temporary protection: *"I needed to have rights in another country. I can't be illegal in another country. If they didn't help me in Germany, I would have apply for a visa to Canada."*

Olena travelled by regular bus service to Berlin and applied for temporary protection. In order to remain in Berlin and not be moved somewhere else in Germany, she needed to rent accommodation in the city and obtain official registration of her address (*"Meldebestätigung"*). This proved difficult and she was running out of savings:

*"Then on [social media], I saw photos of a woman I knew, but not well. She was in Berlin. I texted this woman to see if she could help, if she was renting out a flat or if she could host me. I explained the situation and she told me that she could help me with the certificate of residence from a landlord [*"Wohnungsgeberbestätigung"*].*

*"[...] This woman gave me an address in Berlin and told me they can help me. [...] There I met the owner of the erotic massage place. [...] She said I needed to work there. I said I would work there in order to sort out my documents. [I thought:] it's not real prostitution, and if someone tries to force me, I will protect myself.*

*"I had to pay [US\$106] a month for a certificate of residence at another address in Berlin, [\$319] a month to live and work there, and a [\$213] deposit in case I broke a mirror or something. [...] At this massage place, there were women and girls with drug addiction problems. I'm just one example. I spent my first night at this place, I cried and I was afraid. [...]. I didn't want to be somewhere illegal. I knew I needed to have some rights. I just wanted to make it right, step by step. I was waiting for the Immigration Authority but the volunteers at Tegel [first reception centre] had made a mistake in my email address so I didn't get the email for the appointment.*

*"Staying at the place was mentally very hard, you have no right to a normal life. I worked every day. I saw 5-7 clients a day. The official working hours were from 10am to 10pm. But even at night they woke me up if there were clients, at 1am or 3am. And in the morning, if there had been a client at night and you didn't do it, you had to pay money - [\$128].*

*"We earned about [\$3,195] a month. But they always deducted money from our wages. From the [\$319] we earned each day, the boss easily took [\$213]. For one girl [young woman], the boss earned around [\$10,652] a month. The boss has many flats in Berlin and some cars.*

*"[...] It was not that they forced the women to stay, others were okay with it. Many girls [young women] were addicted, others needed money. [...] They want you to buy expensive things, so you need money. They don't want to see that you are saving money. It's not a place to talk about your rights. It can be really dangerous; they can put drugs in your drinks or get angry.*

*"[...] I left for five days to go on a trip. After this trip, the boss was very angry that I was not working 24/7. She said I wasn't allowed to leave the place without asking her. After that they took my passport, my money and my laptop. They said the room where I was sleeping and working was not safe, they would put it in a safe and they didn't let me access the safe. I didn't know the combination. After two days, when I asked for it back, they said I didn't need the passport. [...] That I can't leave this place.*

*"When the boss left, I asked the cleaner, please give me my passport, my stuff, I will leave this place right here and right now. We had a good relationship. I took my stuff and I left the place. The boss tried to contact me several times, but I blocked all the phone numbers."*

With assistance from NGOs, Olena was registered for integration and professional courses:

*"I have money from the job centre, my bank account, maybe a registration address and a place to live. [...]"*

*I understood that I'm with good people. I plan to finish my degree remotely that I started in Poland. I just want to live a normal life with my rights."*

Refugee interview 2DE-M-01, Berlin, May 2024

\*Name changed to protect anonymity.

## Case Study 2 – Ukrainian woman’s experience of sexual exploitation by her accommodation host in Berlin, Germany

**Oleksandra\***, a young Ukrainian woman, fled to Germany in the early months of the full-scale invasion. She is university-educated and speaks English but not German. She arrived at the main train station in Berlin with thousands of other women and children. She was approached by a man, Carl\*, who spoke English and said she could be standing there for days because there was no online registration system in place. He offered her a place to sleep and said he would have a job for her and would help with the residency papers.

Oleksandra had left her young child in Ukraine with her mother, who had fallen ill. Carl did not help Oleksandra to apply for temporary protection or for social assistance at the job centre. As soon as she moved in with him, Carl started pressuring her, asking her how long she was going to live with him without paying anything. In the end, she paid him, under pressure, with sexual services, for being allowed to stay there.

Then Carl started to exploit her in prostitution. He demanded: *“now you should pay rent, now you should pay for the shopping, the cleaner just came”*. She started engaging in prostitution as she felt there was no alternative. He frequently physically assaulted her. She had nowhere else to live and Carl kept taking her money.

At some point, Oleksandra told Carl that she was going to take the money she earned to return to Ukraine to get her son. Carl physically assaulted her and she ended up homeless. She continued to work in prostitution. During a police check, she was arrested, as she did not have an official registration certificate to work in prostitution in Germany. The police confiscated her cash, took her passport and her details at the police station, and referred her to a women’s shelter. NGOs and the women’s shelter organized financial help for her. Oleksandra ultimately decided not to press charges against Carl.

Case described by a key informant who supported the victim, 2DE-K-09, Berlin, April 2024

\*Names changed to protect anonymity

### Case Study 3 – Ukrainian woman’s experience of forced labour in Warsaw

**Galina\*** is a Ukrainian woman, originally from eastern Ukraine, who had been living in Kyiv for years when the full-scale invasion began. She financially supports her children, who have health issues, and her grandchildren. After three months living in state-provided accommodation in Warsaw, an acquaintance offered Galina a room in the accommodation where he was living.

Galina found an employment agency on social media, which found her a job in cleaning services at a private medical clinic. She works under a civil-law contract with the employment agency. She earns around US\$7.20 gross - \$4.20 net - per hour. Galina’s contract stipulates that she should work a maximum of 250 hours per month. She was working additional hours, around 350 altogether. A manager at the employment agency forced her to sign additional papers stating that she also works as a volunteer and threatened to fire her if she did not sign the contract. They pay her for the additional hours in cash.

She works 15-16 hours a day to earn minimum wage. She arrives at 5:30am and cleans and disinfects the entire clinic. After a surgery has taken place, she runs over immediately to clean and prepare everything for the next procedure. She often has to run from cleaning up after one surgery to another and does not have time to change her cleaning gloves in between. Chemicals then enter through the gloves and injure her hands.

Many Ukrainian women working for this employment agency experience the same working conditions as Galina. They are threatened and verbally harassed by the same person at the employment agency, who tells them: *“you should be grateful for what you have, you are in Poland and not in Ukraine”*. Those who complained about their rights were fired immediately. They are grateful to be employed, so they accept the fact that the employment agency is likely deceiving them about their wages.

Galina is certain that she is not being paid the full amount for the 350 hours she works per month. She does not feel that she can claim the wages owed to her because she would get fired. All the Ukrainian workers earn the same gross pay per hour, but the net pay differs from person to person. Galina believes that the representatives of the employment agency split whatever wages they withhold from them among themselves.

Galina wants to bring her case to a lawyer, but she cannot afford to pay for it.<sup>324</sup> She does not know what her rights are or where to go and she does not have time to seek assistance, with the hours she is working and her family caring responsibilities.

Refugee interview, 2PL-M-02, Warsaw, February 2024

\*Name changed to protect anonymity

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<sup>324</sup> According to information provided to UNODC by Permanent Mission of Poland to the United Nations Office and the International Organisations in Vienna on 31 October 2024, there are options to access free legal aid in Poland, also for foreign citizens, which is offered by various NGOs.

## Case Study 4 – Ukrainian family’s experience of forced labour on a farm in Switzerland

**Helga\***, a widowed Swiss farm owner, was hosting Yulia\*, a Ukrainian woman, and her three children aged 16 and under. Helga showed Yulia and her children around the farm. She showed them how to milk a cow and carry out other tasks. Helga then went away on holiday and left Yulia and her children in charge, saying that they already knew how to milk the cows and run the farm, so they could take care of everything.

Yulia and her children worked on the farm for a whole summer and were not paid for their work. Helga told Yulia that since the family received social welfare payments, they would not receive any wages. The working day was usually from 5am until the evening, sometimes until 9pm. Some hired workers came during the summer to work on the farm, but mostly, Yulia and her children were on their own.

Yulia was scared of being held liable in case there was any damage to the farm or if they did not take care of it properly, so she felt like they had to work that summer. Eventually, Yulia found a way of moving out of the farm. She was scared to be truthful about their experience. Host families give recommendations about Ukrainian guest families, and this is then attached to each family’s dossier. Yulia did not want to receive a bad recommendation.

Case described by key informant who supported the victim, 2CH-K-03, Bern, January 2024

\*Names changed to protect anonymity

## Case Study 5 – Trafficking of IDPs for forced labour in Ukraine

The head of an NGO managing an accommodation centre for IDPs in Lviv oblast in western Ukraine referred a Ukrainian IDP couple, **Viktoria\*** and **Yury\*** to his own farm for work. Viktoria is alleged to have milked goats in harsh conditions, without proper protective clothing, leading to a severe skin condition. Despite her deteriorating health, she received no medical support or medication. Subsequently, Yury also began working on the farm, while they sent their children to a boarding school due to the lack of local schools.

Because of their working hours, Viktoria and Yury lived on the farm, in a dilapidated space with no shower, toilet or proper kitchen. Their belongings were damaged by moisture and rodents. Besides tending to the goats, they looked after other animals on the farm, guarded the farm premises, and secured fishponds from fishers who did not have a permit. Viktoria and Yury are reported to have worked from dawn until dusk, often without holidays or days off on weekends, for twelve months. They were alleged to not have been paid and received leftovers from a hotel kitchen or took eggs and goat milk from the farm to sustain themselves.

This was allegedly justified as payment for the room that had to be kept for Viktoria and Yury's children during their school breaks, though they were living at the boarding school. The situation escalated when the couple demanded wages owed them and the return of Viktoria's bank card, leading to a heated conflict. The family's circumstances finally came to the authorities' attention after an altercation prompting the involvement of the police in August 2023, followed by a court case in November 2023. As of June 2024, a criminal case was ongoing before a Lviv court.

Court records; additional information provided by key informant UA-K-02 in March 2024<sup>325</sup>

\*Names changed to protect anonymity

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<sup>325</sup> The account is based on key informant interview UA-K-02 and on court records for criminal case no. 12023140000001007 of 1 September 2023. See the original indictment in: Ukraine, Halych District Court in Lviv City, case no. 461/9758/23, 20 November 2023: <https://reyestr.court.gov.ua/Review/115023810>. The details of the case described in the interview match those of the court proceedings.

## 8. Methodological Annex

This UNODC research study applied a phased, mixed-methods approach to analyse the evolution of trafficking in persons and smuggling of migrants since the beginning of the full-scale invasion of Ukraine in February 2022. Field research was conducted in three cities – Berlin, Warsaw and Bern. The approach combined collection and review of relevant statistics, data, official records and literature, with a survey and two phases of in-depth interviews with key informants and refugees, culminating in the triangulation and analysis of the data and information obtained through the different methods.

Figure 13: Research methodology for the study



1. The overall **research methodology** and approach, and the individual research tools: sampling strategy, in-depth interview guidelines, focus group guidelines, code of conduct (research ethics) and referral protocols in the case of protection issues, were co-developed by UNODC and the implementing partner Mixed Migration Centre (MMC). The methodology and tools apply UNODC quality standards for research, as well as ethical principles and actions for conducting research with vulnerable groups.



2. UNODC conducted a comprehensive **literature review** of sources relevant to the research topic. During the period March 2022 – September 2024, many organizations, institutions and researchers published relevant research, which informs and contextualizes the analysis of available statistics, and the field research data.

3. **Data and information** on Ukrainians identified as trafficked since 2022 were collected through UNODC’s regular global data collection exercise on trafficking in persons. Administrative data on trafficking and smuggling were also obtained from regional and national statistical reports and public databases. UNODC also collected data on trafficking inside Ukraine and on the national anti-trafficking response, in cooperation with the specialized unit for the investigation and prosecution of trafficking in persons cases at the Office of the Prosecutor General (OPG) of Ukraine, set up in 2022.

Table 1: Field research overview

	Bern/CH	Berlin/DE	Warsaw/PL	Regional	Ukraine	Total
Ukrainian refugees surveyed in 2023	584	332	507	-	-	1414
Non-Ukrainians surveyed in 2023	9	78	102	-	-	188
<b>Total survey respondents</b>	<b>593</b>	<b>400</b>	<b>609</b>	<b>-</b>	<b>-</b>	<b>1602</b>
Key informants 2023	16	14	13	4	-	47
Key informants 2024	9	11	7	4	5	36
Refugees interviewed 2024	3	1	2	-	-	6
<b>Total interviewees</b>	<b>28</b>	<b>26</b>	<b>22</b>	<b>8</b>	<b>5</b>	<b>89</b>

4. For the **survey** conducted for this research, the implementing partner MMC used a non-randomized, purposive sampling approach for quantitative data collection, monitoring for gender and age. The sample was non-probabilistic and aimed to achieve diversity. Respondents were identified primarily through social networks and access to targeted and diverse places of residence such as hostels, shelters and private accommodation.

Surveys were conducted with 1,602 people in Germany, Poland and Switzerland. The surveys were conducted face-to-face during the period 31 January – 26 April 2023 in Berlin, Germany (400), Warsaw, Poland (609) and Bern, Switzerland (593) with people who left Ukraine after January 2022. 1,414 of the survey respondents (88%) are Ukrainian citizens, from various regions (oblasts - *області*) in Ukraine: Kyiv (city) (23%) and Kyiv Oblast (9%); Kharkiv (9%); Dnipropetrovsk (7%); Odesa (5%); Zaporizhzhia (5%); Lviv (5%); and Vinnytsia (4%). 96 per cent of the Ukrainian citizens surveyed identify ethnically as Ukrainian, six per cent as other ethnicities and one per cent as Russian (multiple responses possible).

183 survey respondents are from other non-EU countries – nine in Bern, 99 in Warsaw and 75 in Berlin. They were living in Ukraine prior to 2022 and comprise 103 Belarussians (mostly surveyed in Warsaw), 17 Moldovans, 13 Azerbaijanis, 11 Armenians and seven Russians, and less than five people from each of: Morocco, Georgia, Syrian Arab Republic, India, Islamic Republic of Iran, Türkiye, Israel, Tajikistan, Turkmenistan, Nigeria, Iraq and Kyrgyzstan. An additional six respondents, surveyed in Berlin and Warsaw, are EU citizens who had been living in Ukraine in February 2022. They are from Romania, Hungary, Latvia and Czechia.

Survey respondents comprise 1,209 women (75%), 391 men (24%) and two other/NA/refused (1%). Half the respondents are aged 25-44 years, with the remainder aged 45-64 (23%), 18-24 (19%) and over 65 (7%) years old. 37 per cent of respondents are married, while 48 per cent of men and 36 per cent of women are single. 11 per cent (170/1,602) are separated or divorced, seven per cent (106/1,602) are widowed and seven per cent (106/1,602) are in a domestic partnership. Most respondents who answered the question identify as heterosexual (1,412/1,460 or 97%), while three per cent (42) identify as LGBTIQ+. <sup>326</sup> Just over half (53%) began their journey within the first two months of the full-scale invasion.

The vast majority of respondents completed secondary school (96%) and the majority have a university degree (60%), with the next largest group having completed vocational training (23%). A higher percentage of women surveyed have a university degree compared to men (62% vs. 53%). Around one-third (30%) of survey respondents travelled from Ukraine to the country where they were surveyed with their children; another one-third (30%) travelled alone; 24 per cent with family members; 21 per cent with their partner; and 11 per cent with friends (multiple responses possible). A slightly higher proportion of men travelled alone (34%) or with partners (35%). More women (34%) than men travelled with their children. Women also accounted for the majority of people travelling with other people's children (85% or 29/34).

**5. Sixty-four key informant interviews** were carried out with 78 individuals in the three cities of study, in Ukraine, and at regional level (remotely), identified on the basis of their relevant expertise and experience. The interviews were carried out in two phases, during December 2022 to May 2023 and January to June 2024. Key informants include representatives from national and local government authorities, local, Ukrainian diaspora and international NGOs, UN agencies, community leaders, researchers and journalists. Five key informants identified as having significant expertise were interviewed twice, once in each phase, allowing for a deeper exploration of key themes and how they evolved over time.

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<sup>326</sup> LGBTIQ+ refers to people who self-identify as lesbian, gay, bisexual, transgender, intersex, queer or other minority sexual orientations or gender identities. See: [www.un.org/en/lgbtiq-people](http://www.un.org/en/lgbtiq-people).

Figure 14: Key informant interviews

Interview Code	Country of interview	Type of key informant	Date of interview
1. 1CH-K01	Switzerland	Local authority	20.04.2023
2. 1CH-K03		Accommodation centre	20.04.2023
3. 1CH-K04		Civil society	19.04.2023
4. 1CH-K05		Civil society	26.04.2023
5. 1CH-K06		NGO	26.04.2023
6. 1CH-K07		Accommodation centre	21.04.2023
7. 1CH-K08		NGO	21.04.2023
8. 1CH-K09		NGO	24.04.2023
9. 1CH-K10		Psychologist	21.04.2023
10. 1CH-K11		NGO	21.04.2023
11. 1CH-K12		Federal authority	27.04.2023
12. 2CH-K01		NGO	30.01.2024
13. 2CH-K02		Ukrainian social worker	30.01.2024
14. 2CH-K03		NGO	31.01.2024
15. 2CH-K04		Ukrainian social worker	01.02.2024
16. 2CH-K05		NGO, repeat interview	21.02.2024
17. 2CH-K06		NGO	29.02.2024
18. 2CH-K07		NGO	27.03.2024
19. 2CH-K08		Ukrainian community	20.03.2024
20. 1PL-K01	Poland	Expert/analyst	03.05.2023
21. 1PL-K02		Academic	04.05.2023
22. 1PL-K03		Journalists	24.04.2023
23. 1PL-K04		Research centre	06.12.2022
24. 1PL-K05		NGO	27.06.2023
25. 1PL-K06		NGO	05.05.2023
26. 1PL-K07		International organization	06.05.2023
27. 1PL-K08		Independent stakeholder	05.05.2023
28. 1PL-K09		Civil society	26.06.2023
29. 2PL-K01		NGO	14.02.2024
30. 2PL-K02		NGO, repeat interview	15.02.2024
31. 2PL-K03		NGO	15.02.2024
32. 2PL-K04		NGO	16.02.2024
33. 2PL-K05		International NGO	20.02.2024
34. 2PL-K06	Academic, repeat interview	27.02.2024	
35. 1DE-K01	Germany	NGO	26.04.2023
36. 1DE-K02		NGO	26.04.2023
37. 1DE-K03		NGO	27.04.2023
38. 1DE-K04		NGO	28.04.2023
39. 1DE-K05		Researcher	27.04.2023
40. 1DE-K06		NGO	07.12.2022
41. 1DE-K07		Local authority	28.04.2023
42. 1DE-K08		Federal authority	04.05.2023
43. 1DE-K09		NGO	25.04.2023
44. 1DE-K10		Ukrainian community	31.03.2023
45. 1DE-K11		NGO	18.05.2023

Interview Code	Country of interview	Type of key informant	Date of interview
46.	2DE-K-01	NGO, repeat interview	06.03.2024
47.	2DE-K-02	NGO	12.03.2024
48.	2DE-K-03	Research centre	12.03.2024
49.	2DE-K-04	NGO	13.03.2024
50.	2DE-K-05	NGO, repeat interview	13.03.2024
51.	2DE-K-06	NGO	13.03.2024
52.	2DE-K-07	NGO	14.03.2024
53.	2DE-K-08	NGO	20.03.2024
54.	2DE-K-09	NGO	05.04.2024
55.	2DE-K-10	NGO	09.04.2024
56.	UA-K-01	Ukraine NGO	17.03.2024
57.	UA-K-02	NGO	27.03.2024
58.	UA-K-03	Lawyer/human rights defender	06.06.2024
59.	UA-K-04	National authority	20.05.2024
60.	UA-K-05	International development project	20.06.2024
61.	IN-K-01	Regional Journalists	03.05.2023
62.	IN-K-02	International organization	16.05.2023
63.	NL-K-01	Netherlands National authorities	13.06.2024
64.	NL-K-02	NGO	14.06.2024

A total of 47 key informants participated in 34 interviews for this research during December 2022 to June 2023. The key informants are based in Bern (16), Berlin (14), Warsaw (13), and regional. During the period February to June 2024, 36 key informants participated in 30 interviews (five of which were repeat interviews of the same person interviewed in phase 1) carried out in Berlin (10), Bern (7), Warsaw (6), Ukraine (Lviv and online) (5) and The Hague, Netherlands (2). The key informants comprise 60 women and 18 men.

Six **in-depth interviews** were carried out with five Ukrainian women and one Ukrainian man in the cities under study, who experienced situations that present indicators of potential trafficking in persons cases (see Case Studies in Chapter 7).

While every effort was made to ensure that the research was as comprehensive, representative and objective as possible, some limitations should be noted. The survey respondents were selected non-probabilistically, as a convenience sample, which presents limitations in terms of the extent to which the analysis can be generalized to the entire refugee population. Due to the ethical and practical implications of such research, no children (anyone aged under 18 years) were interviewed or surveyed. This means the information and analysis regarding children in this study is at one remove from children themselves, and drawn from surveys and interviews with adults, as well as from data and literature.

While around two-thirds of the population of adult refugees from Ukraine in Europe are women, around three-quarters of the survey respondents are women, meaning that women are slightly over-represented in the sample. In addition to Ukrainians, the research also covers the experiences of non-Ukrainians who fled Ukraine since February 2022. In Berlin, diversity in this sample was achieved, while in Warsaw, this group mainly comprised Belarusians and in Bern this was not achieved. Efforts were also made to include the experiences of Ukrainian Roma people who were displaced, directly through the survey and indirectly through key informant interviews, but these cannot be taken as representative due to the low numbers involved.

The research methodology initially foresaw a higher number of interviews with people who directly experienced trafficking in persons and/or smuggling of migrants, but significant challenges were experienced in achieving this. This is due to a combination of the difficulty of contacting a vulnerable and mobile population and the welcome fact that there are relatively few people in the study countries who have experienced trafficking or smuggling.

Finally, the administrative and criminal justice data on trafficking in persons included and analysed in the study mainly date from the year 2022. At the time of writing, data for 2023 and 2024 was not generally available. Indeed, some of the data reported for 2022 refer to trafficking cases identified prior to that year and therefore do not relate to the experience of people who fled the full-scale invasion. This means that data for 2023-2024, as and when they become available, may indicate a different incidence of trafficking cases than is reflected in this analysis, based on the sources available in late 2024.

In terms of the scope of this study, the research covers trafficking in persons and smuggling of migrants outside Ukraine, and trafficking in persons inside Ukraine, in territories under the control of the Ukrainian Government.

## 9. Annex: Information provided to UNODC by the Government of Ukraine on actions taken to combat trafficking in persons

– as of 5 December 2024 -

According to the National Police of Ukraine (NPU), the Migration Police Department has been participating in the work of the European Multidisciplinary Platform against Criminal Threats (EMPACT)<sup>327</sup> since 2022, which is a key EU tool in the fight against organized crime. As a result of the full-scale military invasion of Ukraine by the Russian Federation, the implementation of the EMPACT Operational Plans to combat human trafficking, illegal migration and child sexual exploitation has become a priority area in combating these types of crime, protecting Ukrainian citizens from falling victim to human trafficking and establishing inter-institutional and international cooperation in these areas.

At the initiative of representatives of the NPU, in 2023, item 8.5 of the EMPACT Operational Plan to Combat Human Trafficking for 2024-2025<sup>328</sup> included the collection of information regarding the deportation of Ukrainian children to the Russian Federation. In 2023, the NPU participated in the implementation of 20 out of 24 points of the Operational Plan, particularly on combating human trafficking in the Eastern Partnership countries,<sup>329</sup> with an emphasis on Ukrainian citizens who moved to other European countries due to the full-scale invasion of Ukraine, as well as on the points of the Operational Plan providing for holding Joint Action Days: “global chain”, “against labour exploitation linked to agricultural sector” and “labour exploitation”. In 2024, Ukraine continued to ensure its participation in the implementation of the Operational Plan. During 2023-2024, NPU representatives continued to participate in monthly meetings of the UATF taskforce, established in 2022 under the auspices of Europol to combat trafficking of Ukrainians who fled to other European countries in connection with the full-scale invasion.

The Government of Ukraine has also put in place measures to provide administrative services and issue passports to Ukrainian citizens outside the country, including a pilot project (Resolution No. 648 of the Cabinet of Ministers of Ukraine dated 4 June 2024, which entered into force on 30 June 2024 and was in effect until the entry into force of the Draft Law of Ukraine No. 3709-IX dated 9 May 2024 “On Amendments to Certain Laws of Ukraine Regarding the Provision of Certain Administrative Services to Citizens of Ukraine, Including Abroad”).<sup>330</sup> The Ukrainian State Migration Service has developed a draft Resolution of the Cabinet of Ministers of Ukraine to implement the law (“Some issues of registration (including in place of a lost or stolen one) and exchange of a passport of a citizen of Ukraine and a passport of a citizen of Ukraine for traveling abroad, including those residing abroad”). The registration and issuance of a passport for a citizen of Ukraine is carried out in accordance with the Procedure for registration, issuance, exchange, transfer, seizure, return to the state, invalidation and destruction of a passport of a citizen of Ukraine (Resolution of the Cabinet of Ministers of Ukraine No. 302 dated 25 March 2015).

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<sup>327</sup> See European Commission, “EMPACT Fighting Crime Together”, (25 June 2024):

[https://home-affairs.ec.europa.eu/policies/law-enforcement-cooperation/empact-fighting-crime-together\\_en](https://home-affairs.ec.europa.eu/policies/law-enforcement-cooperation/empact-fighting-crime-together_en).

<sup>328</sup> Council of the EU, “Operational Action Plan 2024-2025: Trafficking in Human Beings”, (23 November 2023):

<https://data.consilium.europa.eu/doc/document/ST-14544-2023-REV-1/en/pdf>.

<sup>329</sup> The six countries participating in the EU's Eastern Partnership are: Armenia, Azerbaijan, Belarus, Georgia, the Republic of Moldova and Ukraine: [www.eeas.europa.eu/eeas/eastern-partnership\\_en](http://www.eeas.europa.eu/eeas/eastern-partnership_en).

<sup>330</sup> The Law is available in Ukrainian at: <https://itd.rada.gov.ua/billInfo/Bills/Card/43720>.