

Case Assessment Report

Assisting Displaced Persons from Ukraine: Indications of Human Trafficking and Labour Exploitation

Published by La Strada International, P.O. Box 15865, 1001 NJ Amsterdam, The Netherlands.

www.lastradainternational.org

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Acknowledgements: The findings and recommendations laid out in this Case Assessment Report are based on a survey and interviews conducted by La Strada International among its members, and on reports to donors related to our Ukraine prevention programme (2022 – 2024).

La Strada International would like to thank all its members who participated in the survey and interviews, in particular Pia Marttila, Katarina Iskala, Kateryna Cherepakha, Corina Panaite, Brikena Puka, Paula Filipová, Agnes Pioro, Tamara van Driel, Carmen Martinez Raposo, Irena Dawid, Tatiana Fomina, Nadia Kozhouharova, Eline Willemsen, Eefje de Volder, Mia Manaila, Marija Vukasinovic, Xhensila Murati, Abida Pehlic and Mona Chamass.

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La Strada International, February 2025.

Table of contents

Abbreviations	4
Terminology	5
Introduction	6
A summary of our findings	8
Support for displaced persons from Ukraine	10
Challenges.....	11
Methodology.....	12
Exploitation versus Human Trafficking	13
Identified (mal)practices and vulnerabilities	14
Case study findings in detail	15
Victim characteristics.....	17
Direct Reporting and Referrals	19
Requests for assistance.....	21
Types of exploitation	22
Recruitment	26
Online recruitment and exploitation.....	28
Case Studies: Online Exploitation	30
Access to temporary protection	32
Investigation and prosecution.....	35
Continued vulnerability.....	37
Recommendations	39

Abbreviations

ATTF	Anti-Trafficking Task Force
CSO	Civil Society Organisation
EC	European Commission, also referred to in this text as ‘the Commission’
EU	European Union
IDP	Internally Displaced Person
IO	International Organisation
LSI	La Strada International
NGO	Non-Governmental Organisation
TCN	Third-Country National
TPD	Temporary Protection Directive
UNHCR	United Nations High Commissioner for Refugees
UNODC	United Nations Office on Drugs and Crime

Terminology

The terminology used in this report is defined below.

Criminal exploitation	Criminal exploitation is a form of human trafficking that involves forcing people to commit crimes such as begging, shoplifting, pickpocketing and cannabis cultivation.
Internally displaced persons	Persons forced to flee their homes due to conflict, violence, persecution or disaster, however, unlike refugees, they remain within their own country ¹ .
Labour exploitation	Labour exploitation refers to the unfair treatment of workers, where their labour is undervalued or taken advantage of for the benefit of others, often for profit. This exploitation can manifest through low wages, poor working conditions, excessive hours, lack of job security, and denial of rights or benefits.
Potential victim of human trafficking	A person vulnerable to trafficking in human beings ² .
Presumed victim of human trafficking	A person with respect to whom there are indications that he or she may be a victim of trafficking. This means the victim may have already been informally identified by an NGO but not formally/officially identified by the mandated authority; there has been direct contact with the person and an individual evaluation (by the NGO), in which indicators of trafficking were detected.
Severe labour exploitation	Those forms of labour exploitation that are criminalized, including human trafficking and forced labour.
Sexual exploitation	Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.
Trafficked person	A person who has been trafficked. The term is used broadly to include individuals who have been trafficked but have not been formally identified as such.
Trafficking for labour exploitation	Trafficking for exploitative purposes in any economic sector, both in the formal and informal economy. The concept of 'labour exploitation' in the context of human trafficking is taken to cover, at a minimum, forced labour or services, slavery or practices similar to slavery, and servitude.

¹ <https://www.unhcr.org/about-unhcr/who-we-protect/internally-displaced-people>

² https://home-affairs.ec.europa.eu/networks/european-migration-network-emn/emn-asylum-and-migration-glossary_en

Introduction

Since the Russian invasion of Ukraine in February 2022, and throughout the ongoing war, La Strada International (LSI) and its members have run a variety of programmes to ensure that displaced persons from Ukraine receive adequate assistance and support, in order to reduce the risk of human trafficking among this group. Over the past three years, we have reached hundreds of Ukrainians and other persons displaced from Ukraine, and directly assisted at least 1,517 individuals showing clear indications of being trafficked or experiencing other forms of labour exploitation³.

Now, three years after the start of the war, more than 6.3 million displaced persons from Ukraine still reside in Europe⁴, many of whom are vulnerable to human trafficking. This report details the findings of a case assessment study we carried out in order to discover which human trafficking and labour exploitation practices have materialized over the past three years, and to gather more insight into risk factors and the most vulnerable at-risk groups.

For this study, we analysed 42 cases in detail, and for each we looked at victim demographics (age and gender), the forms of exploitation they experienced and the sectors in which this exploitation took place, the circumstances of their identification and referral, and their support requests and needs. In addition, we looked for information on investigations into and successful prosecutions of these cases. We also assessed whether presumptions made by us and others at the start of the war were in line with our case assessment findings.

In the first months of the war, we conducted a risk assessment⁵ with The Freedom Fund. This baseline research – published in May 2022 – identified groups who were particularly vulnerable to trafficking and exploitation, and who should therefore be prioritised in terms of our focus and actions. These included people unable to access the EU's temporary protection scheme; women and children in general⁶; children – particularly those separated from their carers and unaccompanied, and those in institutional care; people with non-Ukrainian nationality – including undocumented and stateless people who were living in Ukraine prior to the Russian invasion; chronically ill, disabled, and elderly people who in many cases had remained in Ukraine; and groups who already experienced marginalisation and discrimination such as Roma and LGBTQI+ communities.

At the time, we identified a number of factors which would likely increase people's vulnerability to human trafficking – some of which apply to all crises, and some which were specific to this particular situation. These included inadequate or misleading information; exposure to risks online; lack of money and/or access to livelihoods; the existence of criminal networks already operating in the region, and other pre-existing risk factors, including the high prevalence in Ukraine of domestic violence prior to the war, and vulnerabilities from secondary displacement or having lived in disputed territories in Ukraine from 2014 onwards.

³ Statistical data for 2024 is not yet finalised, hence we cannot confirm the total number, but only the numbers that members have provided us with so far. The number of 1517 persons, only refers to the persons assisted by the members who filled out the survey (11 members)

⁴ <https://data.unhcr.org/en/situations/ukraine?utm>

⁵ Preventing human trafficking of refugees from Ukraine - A rapid assessment of risks and gaps in the anti-trafficking response; Authors: Suzanne Hoff & Eefje de Volder, La Strada International and Freedom Fund.

⁶ Given that nearly 90% of the displaced persons arriving in Europe at that time were women and children

Working without a contract and insurance

Alexey

Alexey received temporary protection in a country neighbouring Ukraine. Despite having the right to work, he was employed without a contract in the construction sector. For more than a month, he worked 12-hour shifts and was frequently assigned to operate a circular saw without any protective equipment or training. On one occasion, he suffered a serious injury. His superiors refused to call an ambulance and instead transported him to a hospital themselves. During the car journey, he was given a back-dated employment contract to sign, and did so. Before leaving, he overheard one of his colleagues receiving instructions from the main supervisor to ensure the injury was reported as unrelated to Alexey's work. At the hospital, Alexey was unable to communicate with the medical staff due to the language barrier. He later found out that his injury had been documented as 'an accident at home while using a saw'. His wife subsequently contacted one of our member organisations for assistance. The NGO reached out to the employer, who acknowledged the injury but claimed that he was unsure 'whether it happened at work or at home'. The employer then quickly registered the person for standard medical and social insurance but continued to deny that the injury was work-related. After returning home, the employer visited Alexey and paid him in cash. He also pressured Alexey to sign one document declaring all obligations settled and another confirming safety training that Alexey did not complete. Alexey refused to sign anything despite the employer offering money in exchange. The employer never acknowledged the incident as a workplace injury and has not taken any appropriate legal steps. The NGO reported the incident to the country's labour inspectorate and connected Alexey with a lawyer, enabling him pursue a civil action against the employer.

A summary of our findings

The findings of our case assessment confirmed some of these assumptions but also highlighted some unanticipated insights. Overall, our survey revealed that at least 1,517 individuals from Ukraine were directly assisted over the past three years. As expected, labour exploitation was the most prevalent form of exploitation among those cases, including among the 42 cases we analysed in detail (24 cases). This was followed by cases of sexual exploitation (13 cases) and criminal exploitation (two cases). Of the 42 cases, only two people experienced multiple forms of exploitation, while three people were subjected to forced begging.

The high-risk sectors identified were also in line with our presumptions, with construction, domestic work and agriculture being the most reported. Other sectors included the food industry, manufacturing, cleaning services, and hospitality. This included supply chain workers.

However, our case collection does not show that women from Ukraine have been more vulnerable than men, as we presumed. In fact, while most of the persons that fled Ukraine were female, most of the people we assisted were actually male. Our case studies also reflect this – of the 42 cases, 55% of the persons concerned were male. Women still make up a significant percentage, however (45% of cases).

While our members received reports about the exploitation of children, we assisted only a few minors; only four of the cases assessed involved underage individuals. One possible explanation for this is that exploited minors were mostly referred to specialised childcare and child rights organisations, instead of to our members. The majority of the assisted individuals were aged between 26 and 45 years (46 persons), followed by those aged 18 to 25 and 46 to 65 years. Three cases concerned individuals over 65 years of age.

Another notable finding is that people eligible for temporary protection status remained vulnerable to severe forms of exploitation and abuse. So, despite the prevention activities conducted and their access to rights, these people were still exposed to exploitation and other harm. In 57% of cases, victims had access to temporary protection, in 21% of cases they had no access, while in 21% this information was unavailable.

In addition, while we had expected to assist quite a number of Third-Country Nationals (TCNs), due to their presumed vulnerability, only a few referrals for assistance were received from this group. Four cases concerned TCNs, including one person from Asia, one from Africa and two from the Middle East, while 97% of the 42 cases concerned Ukrainian nationals. Among these Ukrainian nationals there might have been some residing undocumented in a European country, prior to or after the start of the war, however, we have no further information about this.

One of the cases related to an LGBTQI+ person, however, we obtained no information that any other cases related to persons from a minority group.

It has not been possible to assess the degree to which inadequate or misleading information has increased the vulnerability of those exploited, their lack of money, or access to livelihoods. Overall it has been noted that people displaced from Ukraine were well informed about their rights and potential risks, even though some people lacked information or had been misinformed, for instance through social media channels. Generally it was perceived by several of our members that Ukrainians know their rights and tend to contact helplines and other support services sooner than other groups of refugees do, likely because of their greater access to assistance.

Our assessment found evidence of exposure to risks online. In total, 12 of the 42 cases involved online recruitment. This type of recruitment entailed practices such as direct contact via social media platforms (WhatsApp, Telegram, Instagram, Facebook), and job advertisements posted on these platforms and on various websites.

Three cases involved online exploitation – two involving online sexual exploitation and one involving criminal exploitation. Some cases involved more than one person, with a total of 34 persons exploited through online means.

One case related to domestic violence prior to the war. Generally we note that domestic violence cases are only reported to members which focus on this in their mandates, but it's likely that many of these cases are reported elsewhere. From our contacts within the Ukrainian community and support organisations, we often hear of domestic violence, both prior to the war in Ukraine and in host countries.

Information on vulnerabilities from secondary displacement or having lived in disputed territories could only be obtained for a few persons, hence this is not included in our assessment findings.

Support for displaced persons from Ukraine

Since the Russian invasion of Ukraine in February 2022, and the subsequent war, La Strada International (LSI) and its members have developed and implemented several programmes designed to ensure that displaced persons from Ukraine would receive adequate assistance and support, to prevent risks of human trafficking among this group. Our overall efforts focused on five key areas:

1. Expanding outreach efforts and disseminating information
2. Strengthening helpline services
3. Enhancing and extending support services
4. Conducting monitoring, data collection, and evidence-based advocacy
5. Establishing close cooperation with other stakeholders

We have prioritised awareness-raising among displaced persons from Ukraine regarding their rights and the risks of exploitation and human trafficking. This effort has involved distributing information in both online and offline formats, utilising materials such as leaflets, banners, and social media posts. Our members have also provided online and offline information sessions and workshops on human trafficking, along with training for volunteers, cultural mediators, hotline workers, and embassies, to help them recognise risks and vulnerabilities. We have also provided information via websites and online portals tailored for Ukrainians, providing essential information on international and temporary protection, housing, employment, and indicators of exploitation. This was done directly via outreach work (see below), as well as through various online platforms, including chat services, Facebook and WhatsApp. Furthermore, we have provided information for stakeholders and the general public, through webinars, media interviews and campaigns.

The direct support offered by our members spans a wide range of services, including outreach, helpline service and direct support programmes. For the outreach and the helpline services, Ukrainian and Russian-speaking consultants and mediators were contracted. Direct support included counselling, psychosocial support, shelter, referral for comprehensive medical examinations, medical support, and basic humanitarian aid, such as first-aid packages and gifts for children, as well as support with registration for international protection, housing and residence. We have also worked on screening suspicious job offers and general monitoring of job opportunities, as well as the provision of training, empowerment and vocational support to enhance access to employment.

Since the beginning of the war, we have worked closely with various stakeholders to enhance protection and assistance services for displaced individuals from Ukraine. Our contributions to research reports have helped document the situation of Ukrainian victims and potential victims of human trafficking, supporting evidence-based advocacy. We have organized or participated in more than 70 meetings with law enforcement, border police, embassies, trade unions including the European Labour Authority (ELA), and other key European and national stakeholders to strengthen coordinated responses and to ensure adequate identification of vulnerability and referral to support. Additionally, we have aligned our efforts with migrant and workers' rights groups, including self-organized groups of Ukrainians. Furthermore, we have participated in national and regional (UN) task forces on human trafficking and gender-based violence.

Challenges

Despite these extensive efforts, significant challenges were encountered in reaching – and addressing the needs of – displaced persons from Ukraine. The increased demand for assistance placed an immense strain on our work and organisations, stretching resources and capacities. Alongside this, there was a noticeable rise in requests for help from diverse groups beyond Ukrainian displaced persons, raising concerns about ensuring equal access to support for all vulnerable individuals. Furthermore, providing support for certain groups remains particularly challenging, especially for those who stayed behind in Ukraine, including the elderly, people with disabilities, and those in occupied territories. Many people residing in private accommodation also remain hard to reach, limiting their access to vital support services.

As the war continues, public and institutional support has waned, likely driven by fatigue and the shifting of attention away from the crisis. This has created a significant obstacle to maintaining the levels of awareness, coordination and assistance required. We continue to address these challenges, however, sustained attention and resources are necessary to maintain and expand these efforts.

Methodology

The data for this report was collected through a questionnaire, which underwent a review process involving several of our members. Once finalised, it was distributed to all our members for completion. The questionnaire was divided into two parts. The first part concerned general questions, such as the total number of victims helped, their vulnerabilities in general, and malpractices that members observed. The second part comprised case-specific questions, in which members were asked to provide information about a case they worked on.

The questions enquired about the demographics of the individual(s) concerned, the summary of the case, the recruitment procedure, the indicators of human trafficking, who referred the persons, and how the NGO assisted the persons concerned, as well as whether the person was officially identified as a trafficked person (if applicable) and whether there was an official investigation and/or successful prosecution.

Data collection was carried out through two primary methods: members either completed the questionnaire individually or provided interviews during which the questionnaire was filled out collaboratively. However, some members could not provide all the requested information, due to data unavailability. In such situations, they shared alternative insights, including the total number of potential victims of trafficking they had been in contact with, observed trends, and challenges encountered in their work.

Additional secondary sources were consulted to enhance the scope and reliability of the findings. These included existing reports on Ukraine and human trafficking, which provided supplementary information on broader trends and comparative data. This triangulation of sources allowed for a more comprehensive analysis and validation of the information gathered from LSI members.

In total, 11 (out of 32) member organisations provided us with cases by filling out the questionnaire, including those members who assisted people from Ukraine in particular. As some of our members did not receive referrals for support requests related to this group, they did not contribute to the survey. 18 of the 42 collected and assessed cases are included in this report as case studies, to further illustrate case findings and give greater insight into the reported exploitation and assistance requests. While the cases presented are genuine, names and locations have been changed to protect those involved.

Exploitation versus Human Trafficking

It should be noted that, in terms of the response to human trafficking and exploitation, there are many differences across countries, including the way in which the definition of trafficking is interpreted and applied. While in some countries indicators of labour exploitation can be investigated as human trafficking, this might not be the case in other states. Moreover, countries in Europe, including in the EU, use varying approaches with regards to the formal identification of victims.

In several countries there is no formal victim status granted to victims, and only a successful prosecution defines whether or not the person is a victim of human trafficking. If investigations or prosecutions fail, a person – even if human trafficking indicators or practices are acknowledged – might never be granted victim status or the rights to which that victimhood would entitle them.

The absence of a clear definition of exploitation makes it difficult to draw the line between exploitation in terms of violation of labour rights on the one hand, and extreme exploitation amounting to severe forms of exploitation, such as human trafficking or forced labour, on the other. Experiences of persons differ, and situations change; what can begin as an acceptable work situation can deteriorate into a case of severe labour rights violations and even human trafficking over time.

Another challenge is that most European countries only criminalise human trafficking, and criminal offences related to forced labour or other forms of labour exploitation are lacking, hence the need to prove human trafficking in order to criminalise perpetrators for malpractices and ensure access to justice for their victims. Administrative fines, sanctions and civil procedures are sometimes attainable following violations of labour rights and other misconduct, but give victims far fewer access to rights.

Our member organisations assist both people with experiences of labour rights violations and those with indications of more severe exploitation and abuse, including forced labour and human trafficking. The varying scale of exploitation was also noted from the cases we analysed. Many of these cases were or will never formally be identified as trafficking cases. For some of these cases the outcome is still unknown, and there are also cases for which we have received no further information on the outcomes, either from the victims assisted who left our services or the authorities.

Identified (mal)practices and vulnerabilities

Overall vulnerability of displaced Ukrainians

Since the beginning of the war in Ukraine, several vulnerabilities, risks and exploitative practices have emerged across various countries. The findings show regional differences in these practices, as well as in vulnerabilities, legal frameworks, and protection measures, while also revealing some common patterns. Across all countries, Ukrainians still seem vulnerable to (severe) exploitation practices, despite benefiting from temporary protection. Misinformation, lack of awareness and knowledge about their rights still remains, and the desperation to find work and a place to stay, along with vulnerabilities created by the war situation and the limited access to livelihood, are recurring issues that create ongoing vulnerabilities. Generally displaced persons are at risk of exploitation and abuse.

Exploitative practices related to employment

There are several recruitment companies operating in multiple EU Member States targeting Ukrainians through false information about self-employment and deceptive recruitment practices, including in Ukraine, which exploit available support systems for Ukrainians. Additionally, there has been an increase in exploitative practices by various job agencies.

Some of these agencies, mostly from Poland but operating across the EU, are currently under investigation for violating workers' rights. For example, many Ukrainians in the Netherlands are recruited through Polish employment agencies, and end up working under fraudulent self-employment schemes. Exploited workers frequently believe they have signed legitimate contracts, only to later discover that they have been registered as self-employed without their knowledge. These individuals endure low wages and poor living conditions while being exposed to health risks due to the lack of adequate equipment in the workplace. The sectors most commonly affected include transport, logistics, hospitality, and agriculture.

Regardless of the need for labourers, we frequently also see practices of informal work, work without a contract, and work without labour rights protections for Ukrainians. Previously, most Ukrainians working in EU countries needed a work permit before they could obtain a visa. This entailed the signing of a formal employment contract between the employer and employee. However, the removal of this requirement has made it easier for individuals to work informally, often without contracts, as there is no longer any oversight. This likely benefits both employers and employees financially, as taxes and social insurance contributions are avoided. Unfortunately, however, it also increases workers' exposure to exploitation, as employers can stop paying wages at any time without consequence. This situation has been reported in the Czech Republic and Poland, however, it is likely that it occurs in other countries as well.

A sobering limitation of support

As we enter the fourth year of the war, some countries are restricting their support for Ukrainian nationals. While the TPD has been extended until 2026, restricted access to housing and financial support is becoming more common. Furthermore, coordination structures have been dissolved in several European countries, including Belgium and the Netherlands, with people left to navigate administrative hurdles on their own.

Case study findings in detail

We analysed 42 cases from 11 different countries relating to a minimum of 90 persons – while most cases involved only one person, a few concerned multiple individuals. Overall, our survey revealed that at least 1,517 individuals from Ukraine were directly assisted over the past three years by these 11 organisations. Most of the persons assisted – 97% – were Ukrainian nationals, while only three cases concerned TCNs. These involved one person from Asia, one from Africa, and two people from the Middle East.⁷

One possible reason for the low number of cases involving non-Ukrainian nationals is that relevant stakeholders might not have regarded TCNs fleeing from Ukraine as a vulnerable group, which meant they were not categorised as at-risk in the same way as Ukrainian nationals. Moreover, from media sources and information published by the International Organisation for Migration (IOM), we know that many TCNs quickly returned to their countries of origin after the outbreak of the war, especially where those countries were safe. Indeed, some returned via the IOM voluntary assistance programme.

While in several EU countries TCNs were allowed to stay temporarily – until requested to leave or apply for international protection – EU Member States were free to set conditions for this group. Some states only allowed TCNs access to temporary protection if they already had access to international protection in Ukraine – for example as a recognised refugee – or if they had some other form of temporary (national) protection due to a lack of safety in their country of origin. Persons with a valid permanent Ukrainian residence permit at the time the war broke out, could also qualify for temporary protection, unless they were not formally registered in Ukraine.

Other third-country individuals may have been funnelled into the asylum system, rather than anti-trafficking or victim protection services, and not identified as trafficked. While there were many TCNs residing in Ukraine who fled to other parts of Europe⁸, very few were identified as victims of trafficking and referred for support, despite potentially being exploited and abused. Those without proper documentation or those with irregular status may have avoided authorities for fear of deportation and not reported these experiences. The lack of information targeted at TCNs, the lack of safe reporting mechanisms, and the lack of awareness among first line responders likely played a role as well.

⁷ These instances only concern cases from members who filled out the questionnaire. Some of our members also reported cases involving only exploitation; however, most cases involved trafficking as well.

⁸ When the war started, Ukraine hosted significant numbers of people who were not Ukrainian citizens but were lawfully in Ukraine for work or study. This includes students from, among others, the Democratic Republic of Congo, India, Morocco, Pakistan, the Philippines, Tunisia, Azerbaijan, Tajikistan and Kyrgyzstan. While estimates vary, the number of people involved is in the hundreds of thousands. According to the IOM, as of 5 May 2022, more than 241,000 people who do not have Ukrainian nationality were estimated to have fled Ukraine. Source IOM, Regional Ukraine Response Situation Report #17, 5 May 2022, <https://reliefweb.int/sites/reliefweb.int/files/resources/iom-regionalukraine-response-external-sitrep-04052022-final.pdf>

Third-Country Nationals

Abdel and Hafiz

Abdel and Hafiz, two male individuals, originally from a Middle East country, lived in Ukraine for over 15 years before relocating to a different country due to the war. Here they were recruited through an acquaintance in the construction sector, but misled about the working conditions: they were promised legal employment, free housing, and safe working conditions. However, they were only paid a small amount of 'pocket money', housed in a shared room, and not receiving adequate safety equipment or instructions on safety measures. As non-Ukrainian citizens ineligible for temporary protection in the new country, they were assured the possibility of legalising their stay through the job, but no steps were taken by their employer to apply for their residency. When they began inquiring about their salaries and residence, the employer became hostile, dismissed them immediately, and ordered them to vacate the apartment.

The police initiated an official investigation, which was later discontinued due to lack of evidence. The individuals were not formally recognised as victims of trafficking.

Third-Country Nationals

Grace

Grace was originally from a non-European country, where homosexuality is severely persecuted to this day. She had been imprisoned for some time because of this in her home country, and when she got out, she turned to a family friend who sexually assaulted her. In self-defence, she did hurt the respective individual and had to flee the country, so she would not be imprisoned again. With the help of a friend, she arranged to move to Ukraine. In Ukraine, she was picked up by a person who took her passport and brought her to an apartment. Upon arrival, she was informed that she had a remarkable debt to pay off and was forced into prostitution. It was only when the war broke out in Ukraine and her perpetrator had to flee, that Grace could escape the exploitative situation. She managed to reach a Western European country, where her legal representation in the asylum process referred her to one of our member organisations.

However, Grace was never formally registered in Ukraine, therefore, she could not prove her Ukrainian residence and not obtain protection status. Furthermore, she was unable to assert her victim's rights in the host country because her exploitation occurred solely abroad. Grace is currently undergoing an extended asylum procedure and risks deportation to her home country.

Victim characteristics

The majority of the assisted individuals were aged between 26 and 45 years (46 persons), followed by those aged 18 to 25 and 46 to 65 years. Additionally, there were four cases involving underage individuals and three cases involving individuals over 65 years old. For an overview, see *Figure 1*.

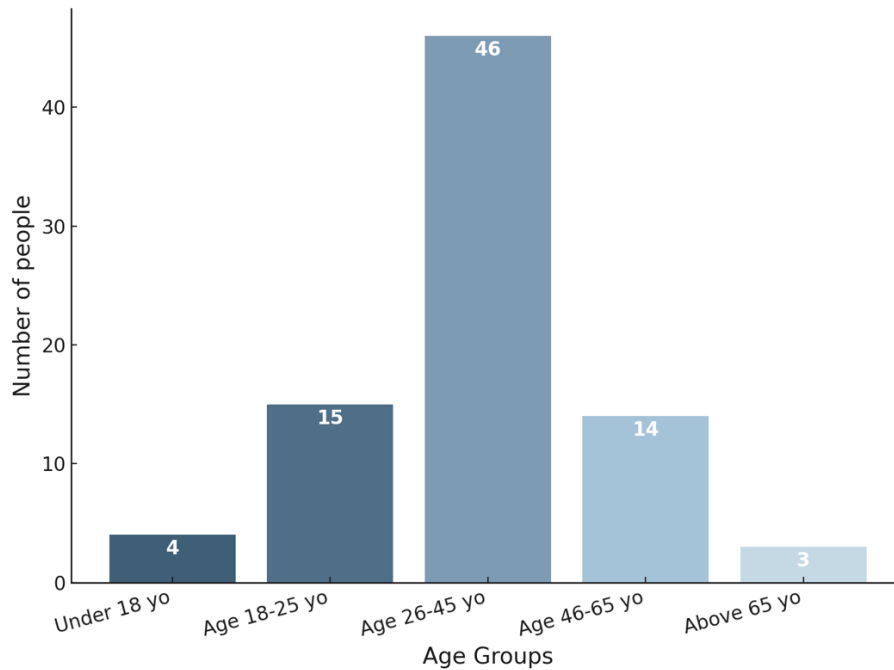


Figure 1: Age Distribution

It is interesting to note that, while most of the persons who fled Ukraine were female, most of the people we assisted were male (55%) – however, women still make up a significant percentage (45%) of the persons assisted. See *figure 2* below.

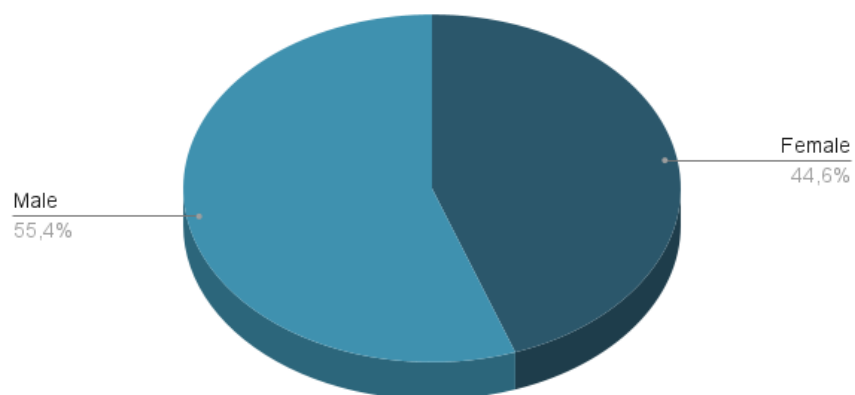


Figure 2: Gender Distribution

Suspected trafficking of a minor

Bogdana

Bogdana, 15 years old at the time, arrived in a country neighbouring Ukraine in December 2024, accompanied by an unrelated man nine years older than her. When they arrived at the immigration office for their temporary residence documents, employees notified the organized crime office and the child assistance and protection department of the situation.

The girl did not speak the local language or English. An investigation was opened concerning the suspected trafficking of a minor at the beginning of January 2025. However, at the beginning of February 2025, both the man and the victim disappeared. So far, they have not yet been found.

Direct Reporting and Referrals

The outreach and awareness work conducted by NGOs and others appears to have been a crucial source of information and support for many vulnerable individuals. Those who faced exploitation often contacted our members directly, which is likely a positive outcome of the information campaigns they organised. Exploited persons were also detected by other frontline actors, who then referred cases to our member NGOs. These included law enforcement actors (including border police) and other NGOs, as well as social workers, reception centres, municipalities, managers of shelters, and individuals.

Several members reported that Ukrainians sought help more frequently than other groups or than they did before the war. Some of our members believe this is likely due to greater access to assistance under the Temporary Protection Directive (TPD), and to the enhanced protection measures, information campaigns, and the availability of services. In comparison with other refugees, they have a legal right to stay and therefore feel safer in asking for information and support. Another factor mentioned, for example in Finland and Albania, was the establishment of new services specifically aimed at assisting Ukrainians playing a significant role in this.

In the Netherlands, before the war, there were very few reports of exploitation reported by Ukrainians. However, following the onset of the war, and the increase in the number of displaced persons from Ukraine, there has been a significant increase in complaints. In 2023, the Dutch Labour Inspection recorded 34 reports, up from 12 in 2022 and only two in 2021. One clear reason is that now – according to UNHCR data – there are 121,645 Ukrainian refugees⁹ registered in the Netherlands. Before the war this number was much lower; on 1 January 2022, around 21.000 persons with Ukrainian origin lived in the Netherlands.

Ukrainians seem also more empowered to ask for their rights, and several situations with likely indicators of labour exploitation were resolved. For example in Romania, Ukrainians demanded their rights (i.e. to be paid) from their employers, indicating they would contact the national anti-trafficking authorities if the employer did not comply. However, this trend is not universally evident across all countries. In Switzerland, our member remains uncertain as to whether Ukrainian nationals are more inclined to contact the authorities than people from other countries. While there has been an increase in the number of Ukrainians seeking assistance, reported by NGOs, this may also be attributed to the overall increased population of vulnerable Ukrainians in the country, as in other European countries.

Another contributing factor could be the restrictions on sex work for people with temporary protection, despite sex work being legal in Switzerland. This has created vulnerabilities, leading to more Ukrainians working in this sector reaching out for help. This is further evidenced by the fact that most cases from our member in this country involved individuals contacting the ‘Support for Migrant Women and Sex Workers’. Moreover/ Additionally, in Spain no significant difference in the willingness of Ukrainians to contact authorities compared with other nationalities was reported by NGOs.

⁹ UNHCR Portal, <https://data.unhcr.org/en/situations/ukraine?utm#> (data of 15 January 2025)

Referral by the border police

Olga

In the autumn of 2022, border police contacted one of our member organisations in a European (non-EU) country via their hotline. They explained they had stopped a man and a girl at an airport that morning. They were both due to fly, but the girl was in an inadequate condition and could not talk, which seemed suspicious to the border police. Therefore, the police detained them for investigation. However, the man managed to escape and left the girl alone.

After the call was received, the NGO sent a special mobile team to the airport. In the meantime, the girl's condition improved, and she informed them that she was from Ukraine and had met a man in the country of stay, who drugged her. The girl was frightened and did not know how she had ended up at the airport. She was accompanied to a specialised shelter for trafficked persons and received assistance.

An investigation was conducted but it was not successful, and the police could not find the individual, so the case was not followed up. Olga did not benefit from temporary protection because, at that time, the country was not yet granting this status.

Requests for assistance

From the cases we collected, the most common type of assistance requested and offered was legal information (37 of the 42 cases), followed by various other types of assistance such as material assistance, overall case management and filing an official complaint (28), and legal aid (15). Often, organisations provided multiple forms of assistance, resulting in some overlap among the categories presented in *Figure 3*.

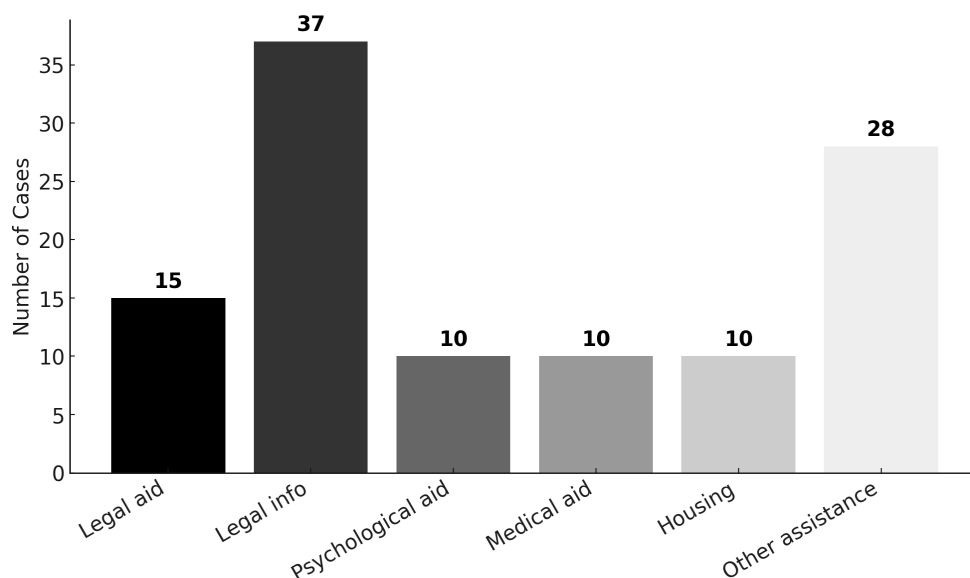


Figure 3: Distribution of the Type of Assistance Provided by NGOs

For most individuals concerned (38 out of 90), support was offered for a short period of less than one month. However, some Ukrainians (17) received support for a longer period – from six months to a year or more. Cases of less than a month involved one-off calls through hotlines, disrupted assistance due to loss of contact with the potential victim, or a rapid resolution to the issue (e.g. the individual was compensated for their work after the NGO contacted their employer).

At the time of writing this report, there were also 14 individuals who were still receiving assistance from the NGOs, primarily because these cases were more recent or an official investigation was being conducted by the police. *Figure 4* below offers an overview.

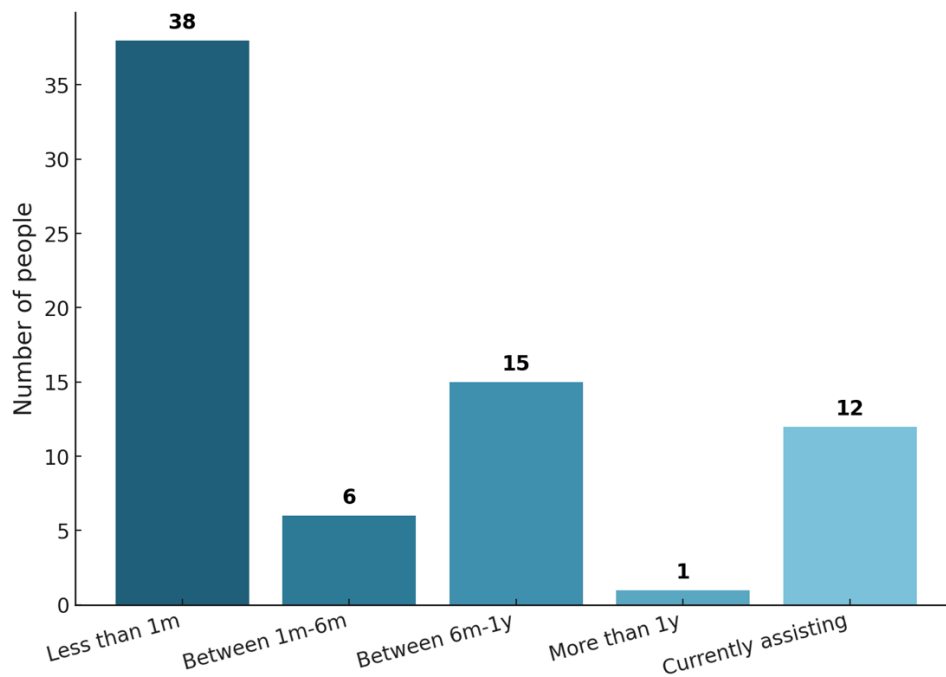


Figure 4: Period of Assistance Provided by NGOs

Types of exploitation

Labour exploitation was the most prevalent form of exploitation among the cases we collected, followed by sexual exploitation and criminal exploitation. Two people were involved in multiple forms of exploitation and three were subjected to forced begging. For six of the collected cases, the form of each person's exploitation was not specified, however, these involved, amongst others, trafficking in minors, child pornography, and physical and sexual violence. A visual representation of this can be seen in Figure 5.

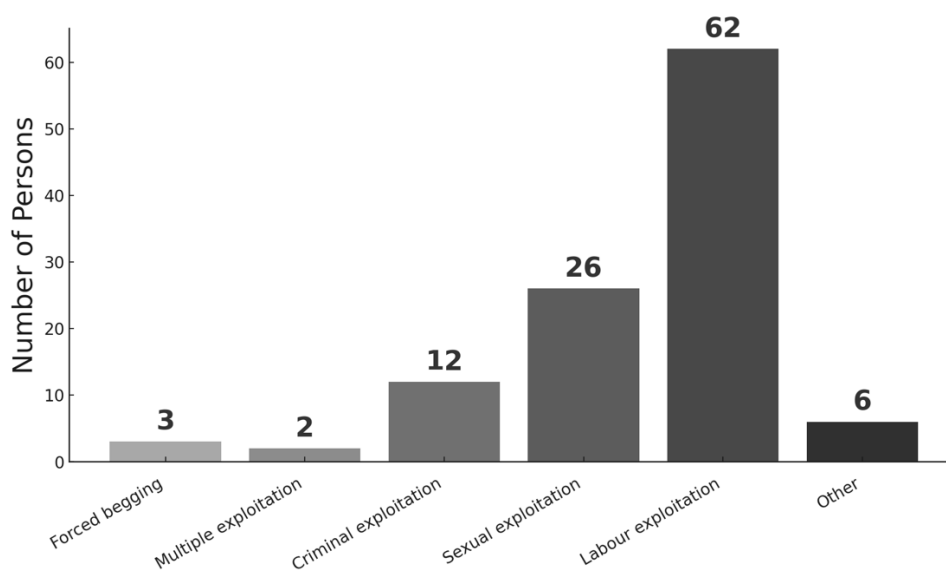


Figure 5: Prevalence of the Exploitation Type

The prevalence of labour exploitation can be attributed to the malpractices of employers, who often employ individuals without a contract. This leaves many unprotected and also impacts people’s willingness to reach out for help as they do not want to be punished for working irregularly. Another cause is that some of those leaving Ukraine need to send money home and employers lure them with false promises of a high salary and accommodation. However, these salaries never reach the employees and the employers often threaten to evict them if they refuse to work.

The assisted persons from Ukraine were exploited in various labour sectors, with construction, domestic work and agriculture being the most prevalent. Other sectors included the food industry, factory work, cleaning services, supply chain, and hospitality. In the Netherlands, for example, exploitation of Ukrainians often occurred in factory work, particularly in the poultry sector. An overview of the number of cases for each sector can be seen in *Figure 6 below*.

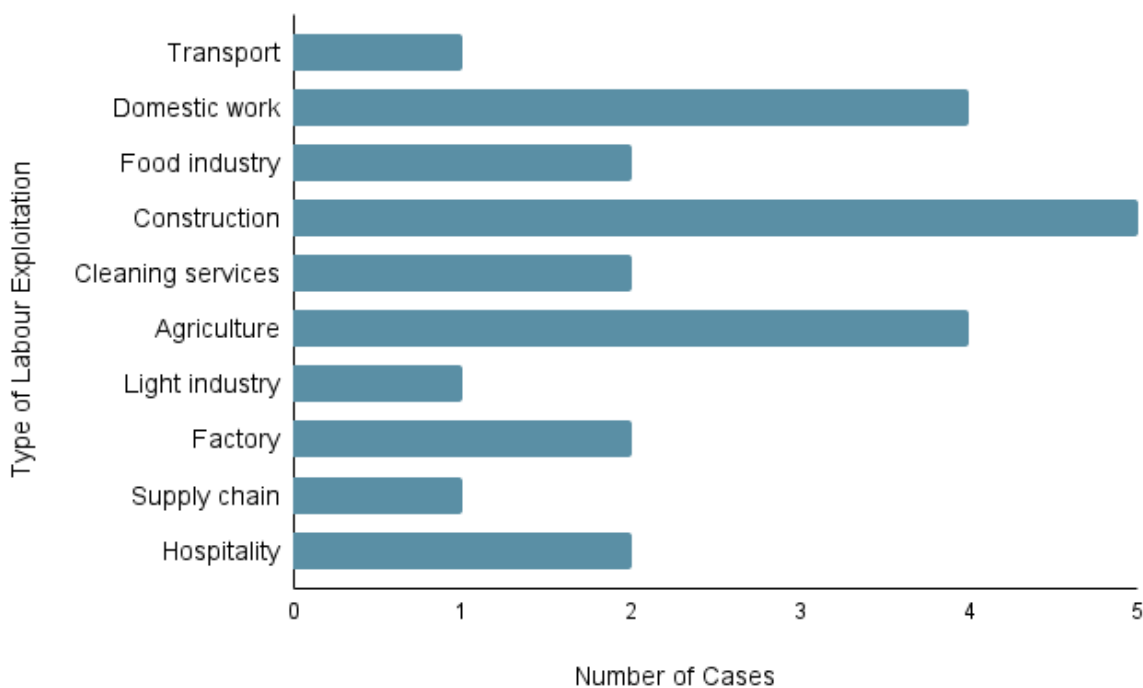


Figure 6: Types of Labour Exploitation

Forced into begging

Anna

After losing all her belongings due to the war, Anna moved in with a man in Ukraine who later took her to a neighbouring EU country to work. She was housed by him in a dormitory with five to six others and forced to work in the food service industry, but only received enough money to buy food and had no personal belongings.

After some time, she was moved to a different country, where she was forced to beg in the subway to pay for housing and food. For 11 hours a day, Anna could not leave her designated area. She did not speak the language and was not aware of how much money she earned. Each day, the perpetrator collected her earnings, while she only received limited food.

Her identity documents and phone were stolen, likely by the perpetrator. She faced verbal and physical abuse for not earning enough and had no way in which to contact her family. During a meeting with an outreach worker, she expressed a desire to return to Ukraine but was afraid of the consequences of leaving. After several interactions with outreach workers, she agreed to accept their help.

Initially, Anna did not have access to her rights under the Temporary Protection Directive as the perpetrator had smuggled her into the country. However, after accessing the services of our member organisation, she benefited from residency support and humanitarian aid. Anna also went through the formal identification process, which had a successful outcome. There has been an official investigation, but this was acquitted. At the time of writing this report, an appeal is ongoing.

Sexual Exploitation

Nadya

The police arrested Nadya while investigating residence offences. In the conversation that followed, her story showed clear indicators of trafficking for sexual exploitation. The police then put her in contact with our member organisation in the respective country.

The presumed perpetrators were from an agency that Nadya never got to know personally. The contact with the perpetrators took place over social media platforms and phone calls. She was lured with false promises, received less than 50% of her earnings, and could not decide for herself which clients and practices she accepted. Nadya was under extreme pressure to send money to Ukraine, so she was in great financial need. Her family was in danger of losing their home if no money came. Nadya had only worked in the host country for a few days and had a tourist visa; before that, she had already been to a different country, where she received temporary protection. It is possible that she had already been in contact with the police and other NGOs there. After staying at our member's for a few days, Nadya left the country.

Exploited in factory work

Katya

Katya fled Ukraine at the beginning of the war. She did not benefit from temporary protection in the host country but had a visa for leave to remain. She found work in a food production factory through an acquaintance who promised her four euros per hour and free accommodation.

Katya worked 16-hour shifts starting at 4am, and was not provided with an employment contract. If any of the workers requested a contract, shorter shifts, or inquired about their wages, the agent's co-worker would threaten them or evict them from the dormitory, even in the middle of the night. Moreover, the agent allegedly deducted 100 euros each month for health insurance, even though Katya already had health insurance covered by the state. She only received a small allowance, which was insufficient to purchase food. Being constantly at work, she had no time to seek help for her situation. After two months, Katya was admitted to the intensive care unit of a hospital for sepsis caused by bed bugs in the accommodation. While there, she contacted the police and the refugee assistance centre for help with accommodation. She was provided with the contact information for our member organisation. At the time this report was written, civil proceedings for unpaid wages were ongoing.

Recruitment

From our assessment of those cases with indications of exploitation and abuse, we see that perpetrators used different recruitment techniques, which mainly distinguish between:

1. Individuals recruited in person, including through the 'loverboy' technique¹⁰
2. Persons recruited online

Most cases involved direct contact between the perpetrator and the victim, with the exploiter also being the recruiter. For example, in some cases, perpetrators visited shelters where the individuals were hosted, luring them with a job offer.

Of the cases we collected, four involved the so called 'loverboy recruitment technique'¹¹. In two of these cases, the victim met the perpetrator after leaving Ukraine, for example, an underage girl who met an older man in Poland and was coerced into smuggling individuals across the German border. In two cases, the perpetrator trafficked the person out of Ukraine.

On other occasions, the manager of such shelters or one of their acquaintances recruited the victim, or they were recruited by hosts in private homes. For instance, there were several instances in which displaced persons were forced into work by their host, who convinced them they must work to cover their accommodation costs. Other instances involved persons who received accommodation from their employer and were threatened with eviction if they wanted to leave or asked for a pay cheque. One example was the case of Denys, whose employer promised him proper accommodation and assistance under temporary protection. Despite this, Denys only received a small cash advance and, when he decided to end his employment due to health issues, the employer evicted him.

¹⁰ Generally we sustain from using the term 'loverboy', as it is not a legal term and the crime remains human trafficking. Moreover, it trivializes the issue by evoking associations with romance, obscuring the serious criminal intent behind it, while it imposes limitations by focusing on young girls, disregarding that this method is also used to exploit adult women. Furthermore, it might reinforce stereotypes and sensationalize the issue, that do not align with the reality. Lastly, it frames human trafficking as an individual problem, failing to address structural factors such as poverty and restrictive migration policies.

¹¹ Idem

Recruited from a shelter

Andrej

The case involved Andrej and five other displaced individuals (three women and two other men) who were recruited from their shelter for displaced Ukrainian persons in an EU country. They all benefited from temporary protection. The employer visited the shelter and presented them with a job offer in the poultry industry, loading trucks and transporting goods to various EU countries. The signed contract specified that the employees would be paid per delivery and not hourly. The individuals were not provided with suitable clothing and were entirely reliant on the employer for transport. After delivering the products, they sometimes had to wait for many hours to be picked up and returned to the shelter. When three of the workers fell ill, they reported this to their manager, who subsequently fired them without pay.

Three of the affected individuals contacted our member organisation and, together, they initiated a procedure against the employer and reached out to the labour Inspectorate. At the time of writing proceedings were still ongoing, however, the individuals contacted the NGO, and asked for the proceedings to cease. The NGO is not certain of the reason for this and whether the former employer had any involvement or had pressured them.

Recruited by own partner

Olena

Olena, a mother of two children, was pregnant with her third child when she came to a country neighbouring Ukraine with her partner. They all benefitted from temporary protection and the man was looking for work. A person who saw Olena (still pregnant at that time) begging on the subway contacted the national anti-trafficking authority of the country via its hotline. A formal complaint was filed and law enforcement authorities started an investigation. The case was referred by the authorities to our member organisation, who also asked the NGO to be present at Olena's hearing. It was believed that Olena's partner forced her to beg. However, the law enforcement authorities did not find enough evidence and the victim stated that she was not coerced into begging. Thus, the case was dismissed.

Online recruitment and exploitation

In total, 12 of the 42 cases involved online recruitment. Some of these cases involved more than one person, and a total of 34 people were exploited through online means. This type of recruitment entailed practices such as directly contacting people via social media platforms (WhatsApp, Telegram, Instagram, Facebook) or posting job advertisements on these platforms and other websites. In eight of the collected cases, it was not known if online recruitment took place. See figure 7.

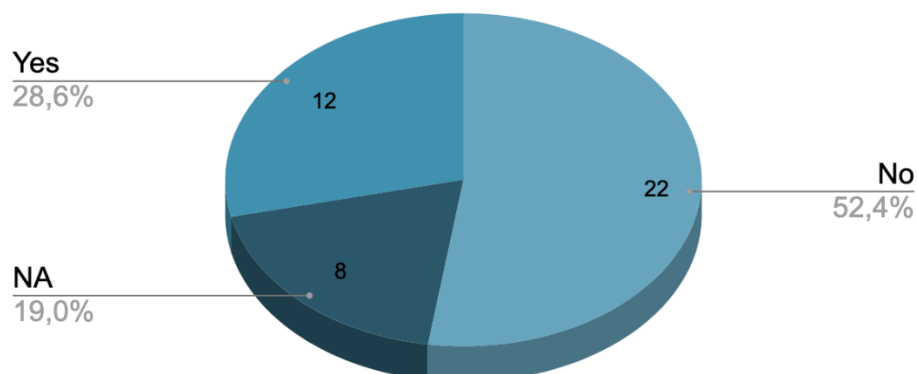


Figure 7: Prevalence of Online Recruitment

Three cases involved online exploitation, two of which involved online sexual exploitation and one of which involved criminal exploitation. For two of the collected cases we do not have any information about online exploitation and, for the rest of the cases, we know it did not take place. See Figure 8.

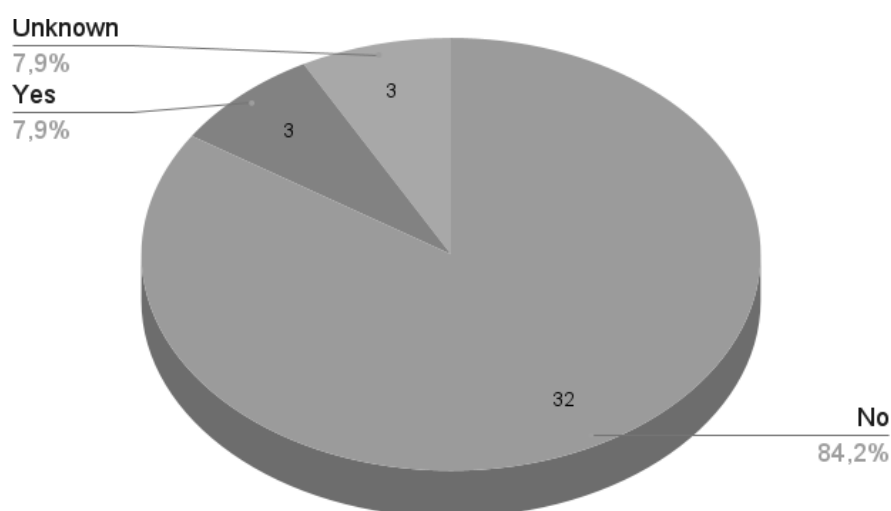


Figure 8: Cases Involving Online Exploitation

Online recruitment through Facebook

Anastasia and Ania

Anastasia and her sister Ania contacted our member's hotline after arriving in the host country. They found work through a Facebook group at a food production factory, via an employment agency. Their employer forced them to work long shifts and carry heavy loads, but they received little pay in exchange. Eventually, the sisters decided to escape at night to avoid being seen. They found new work through another Facebook advertisement and paid the new employer to pick them up. They then began working as cleaners at a different location. The new employer never provided them with a formal agreement. The two sisters worked for two months, often for 10 to 18 hours a day, including weekends, nights, and public holidays, for up to 300 hours per month. They were constantly monitored and were denied breaks for food. The employer frequently yelled at them, demanding more work and assigning extra cleaning duties. Moreover, one of the sisters was also physically assaulted when she refused to take on another cleaning task.

The sisters received a small advance payment, enough to buy food. However, their wages were constantly postponed and, finally, the employer informed them they would not be paid at all. The women later learned that the employer routinely hired new cleaners every two to three months, only to evict them without pay and hire replacements. Eventually, the employer evicted them, too, and the sisters decided to seek help.

The two sisters were officially recognised as victims of trafficking. When this report was written, civil proceedings for unpaid wages were ongoing.

Online exploitation

Ruslana and others

Over the past three years, one of our member organisations in a non-EU country has assisted 12 cases of Ukrainians trafficked and exploited after the war began. In one particular instance, the police identified and referred 11 Ukrainian citizens (nine men and two women) to our member organisation for assistance.

All individuals, including a woman called Ruslana, were recognised as victims of trafficking and were exploited for forced criminal activity. The legal procedure for prosecuting the crime of human trafficking was still being pursued by the Prosecutor's Office. There were suspicions that the individuals were trafficked by an organised foreign criminal group. After they were discovered, all received temporary protection as presumed victims of human trafficking.

All individuals were recruited through the Telegram platform and they each received a job offer in the form of an online link. After responding to the job offer, the individuals travelled to an EU country, where they were subjected to a polygraph test under duress. The test confirmed that these individuals did not use drugs and did not have criminal records. After successfully passing the polygraph test, the individuals underwent a three-day training programme, in which they learned the true nature of the 'job'. They were later transferred from this country to another country, where they were exploited through online work.

The persons had to send online messages through computer programs to various people. These messages appeared as job offers, and those accessing these links were recruited and forced to work in the distribution and transportation of narcotics. The entire process was carried out through Telegram.

Online Exploitation

Tatiana

Tatiana was living in a private apartment with other women, some of them from Ukraine, which they found via a platform on which private individuals can offer free temporary accommodation to Ukrainian displaced persons. However, after arriving, they were forced to work in prostitution. The perpetrators took their passports and their phones, and violence and threats were used. Some of the women were allowed to leave for a few hours at a time. If they did not return, the other women would suffer the consequences.

Tatiana managed to steal a laptop from a client and contacted one of our member organisations. The NGO tried to accompany one of the injured women to the doctor, bring medicine, and provide shelter for all of them. The women were frightened and did not believe the police could help, as they previously had to provide services to police officers and were poorly treated.

Our member managed to arrange an online appointment to speak with the women. However, before the appointment, contact was severed and nobody answered further calls. Later, the NGO decided to inform the police but they closed the case, saying it was a scam. The NGO was uncertain about the situation, as similar patterns of contact were made with other LSI members around the same time.

Access to temporary protection

Of the total number of 42 cases assessed, slightly more than half (57%) involved individuals benefiting from temporary protection. See Figure 9. Twenty-one percent involved individuals who did not fall under temporary protection, either because they were in the host country before the onset of the war or they were there only for a brief period, before returning to Ukraine. Another reason can be that people who lived in Ukraine might not have been formally registered here. While reasons were not always known for those having no access, in 21% of cases, no information was available at all about access or not to temporary protection.

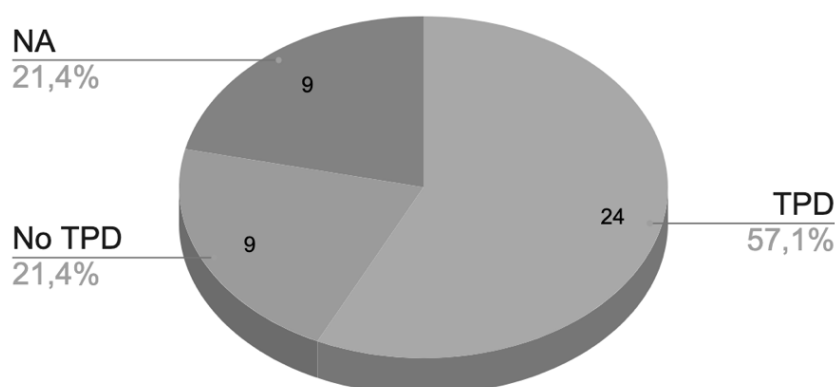


Figure 9: Persons under Temporary Protection

We had presumed that people who were able to access the EU's temporary protection scheme would be less at risk of trafficking and exploitation. While this is likely to be largely true, our survey findings show that other vulnerabilities continue to pose a risk even for those who benefit from temporary protection. One reason for this might be that, despite temporary protection and access to the labour market, many Ukrainians still work informally and their labour rights are therefore not adequately protected.

For instance, our member in Poland noted that, with work permits no longer necessary, many Ukrainians started to work without an employment contract or agreed labour conditions in place. Prior to the war, Ukrainian nationals needed to obtain residence and work permits in order to work in Poland, but both requirements are no long in place with the temporary protection for Ukrainians. Consequently, hiring Ukrainians without providing them with an employment contract has become a common practice for employers and recruitment agencies in the country. The prevalence of informal employment arrangements leaves many workers unprotected and vulnerable to abuse. Other members reported that this is common in other countries, too.

Access to temporary protection

Maksym and others

The case involved seven men, some recruited in Ukraine and others in Poland through friends or email. None of the people involved were registered for temporary protection. They signed a contract with an employment agency, and it was through this company that the men were hired to work in the harbour of a different European country. The agreement stipulated that they would be paid 16 euros per hour, however, they received no payslips and worked very long hours. They requested payment from their employer, but it was not forthcoming.

The workers were deceived by their employer into registering with the Chamber of Commerce as self-employed, without understanding what they were doing. As a result, those involved were not aware they had to pay taxes and accrued a substantial debt to the tax authorities.

They contacted our member organisation in the country separately, and the NGO filed a report with the labour inspectorate. In parallel, they initiated court proceedings. Meanwhile, the employment agency was declared bankrupt. It was attempted to lodge complaints against the company that hired the men through the agency, but this company claimed it was not responsible, stating that it had paid the agency. However, according to national law, the company can indeed be held responsible.

Many Ukrainians seeking temporary protection in Europe still have family in Ukraine. In some instances, individuals need to support those who stayed behind and, as a result, begin working as soon as they can find a job. This renders people more vulnerable, even if they benefit from temporary protection, as perpetrators can lure them in exploitative situations promising large sums of money in exchange. This vulnerability also applies to individuals who left Ukraine prior to the war and were already working in Europe. Some employers, knowing about the pressure their employees are under to send money home, take advantage of this by demanding long shifts in exchange for little money.

A Ukrainian living abroad before the war

Lyuda

Lyuda, born in 1963 in Ukraine, left her country to escape her violent ex-husband and arrived in an EU country in February 2020. In 2021, she began working for an elderly couple and moved in with them. She had to take care of the man, who suffered from Alzheimer's, and was required to work from 8am to 9pm without a break. In the mornings and evenings, she would accompany the man from one room to another, changing him, washing him and feeding him, while also preparing meals and doing the cleaning, gardening, and shopping. At times, she was woken during the night to change the man's sheets and clothes after he'd wet his bed. His wife often yelled at her, threatening to evict her as soon as she refused to comply with a request, insisting that the room was expensive.

The situation worsened, and at one point Lyuda no longer had access to her passport and house keys, and had to seek permission to leave the house. Her living conditions were poor – she was permitted to shower only once a week and was prohibited from using the oven or the washing machine. On one occasion, she broke her arm, yet she was compelled to continue working. Furthermore, her services went unpaid for months, and when she finally secured a contract with an agency, she received only two payslips totalling a few hundred euros. Eventually, she left the severely exploitative situation with the support of our member organisation when she found shelter elsewhere (December 2022). Because of living abroad, when the war broke out, she did not benefit from temporary protection. However, she managed to obtain independent housing and can now legally work in the (EU) country she resides, as she obtained administrative protection (asylum as a victim of domestic violence in Ukraine).

Investigation and prosecution

When analysing the 42 cases, we saw that, in general, investigations are often dropped or unsuccessful, leaving victims with little access to assistance and support. Moreover, in most instances, there was no official investigation (12 cases). In 10 cases, we were informed that there was an official investigation, however, we are not certain whether the outcome from these investigations was successful. See *figure 10* below.

When a labour inspectorate was involved and informed about the exploitative labour situation, administrative procedures were started, or a civil procedure, while, in other instances, criminal proceedings were more often initiated. Furthermore, two of the cases involved parallel proceedings, including both a criminal and administrative procedures. From what we have seen, the labour inspectorate does not usually address the exploitative situation. In two cases, the investigation was put on hold because the victim and the perpetrator disappeared or the victim left the country.

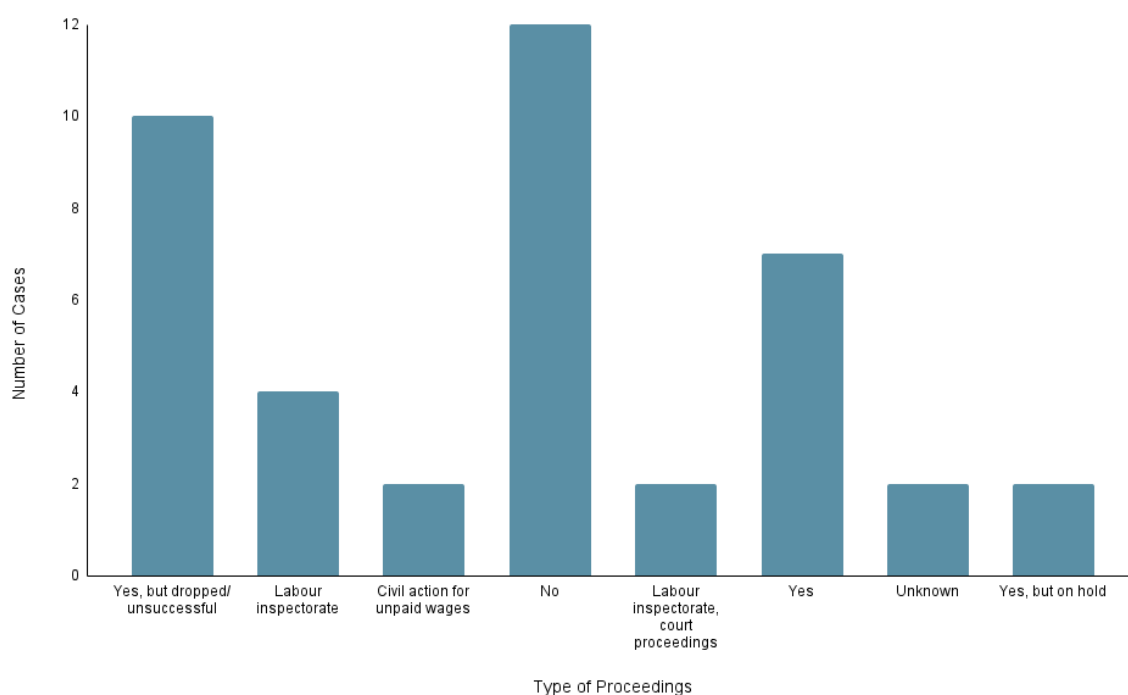


Figure 10: Investigations Regarding the Exploitation

Successful court decision

Vitaliy and others

The case involved seven individuals (five females and two males) recruited through Facebook by a Foreign company. The individuals had to travel at their own expense from Ukraine to an EU country and were required to pay for a BSN number. None of them received a contract. The individuals then travelled to a different European country, but when they arrived at their designated accommodation, they found they were not expected and the living conditions were poor. Moreover, their working agreement stipulated payment of 9 to 10 euros per hour – below the minimum wage in the country. Nearly every day, they worked in different locations and no longer knew who was responsible for their payment.

After six weeks, they were dismissed and not compensated. They contacted one of our member organisations, which reported the issue to the Labour Authority and to the company (which never responded). The NGO also initiated a claim for the individuals' payment and hired a lawyer for this purpose. After one year, the court decided that the company should pay; prior to the court session, The company informed the NGO that they would pay and kept to their promise. Subsequently, the court ruled that the case involved a severe form of human trafficking and labour exploitation.

Continued vulnerability

The full-scale war has significantly increased vulnerability among Ukrainians. Many individuals, driven by desperation, accept jobs or assistance without proper verification or legal documentation, leaving them open to exploitation. Data from Ukrainian police indicates that the majority of identified victims within Ukraine are women subjected to sexual exploitation¹², while the Ukrainian National Social Service reports that most individuals receiving formal trafficking survivor status are men, primarily exploited in armed conflict or captivity. Individuals from occupied territories are often reluctant to report exploitation due to fear of being accused of collaboration with the aggressor.

Initially, the displacement of Ukrainians was driven by a sense of urgency, humanitarian responsibility, and broad solidarity across Europe. However, as the war has continued and enters its fourth year, political momentum has weakened in some countries, leading to policy shifts that restrict protection and, in turn, increase the risk of exploitation.

One such example is Switzerland. Initially, the country implemented effective safeguards against human trafficking, including legal migration routes, facilitation of transportation, and accelerated labour market access under Swiss protection status. These measures reduced vulnerability to trafficking and were recognised as a best-practice model. However, political support for these protections has waned. Recent restrictions on protection status for Ukrainians fleeing 'less intensely disputed areas' undermine their safety and increase their risk of exploitation. This shift also highlights growing distrust and political resistance toward Ukrainian displaced persons. And in the occupied territories of Ukraine itself, systemic issues such as fear of reporting and lack of formal recognition of trafficking cases remain significant barriers. The intersection of conflict and exploitation highlights the importance of comprehensive legal and support mechanisms for survivors.

With the war entering its fourth year, concerns and uncertainty remain, particularly regarding the continuation of assistance and protection. This calls for a robust and sustained response by states and all actors to prevent further exploitation and abuse.

¹² In contrast to this, based on the survey we conducted, most of the cases involve labour exploitation.

Vulnerable for labour exploitation

Dima and others

This case involved five Ukrainians, including a person called Dima, who had worked for the same company for several years. They all benefited from temporary protection in the host country and worked in the construction sector. They were recruited through a job advertisement, spoke only their native language, and had very little understanding of the contracts they had signed or their rights as employees. At the outset of their employment, the employer provided accommodation. The working hours varied but, in general, the tasks and hours increased over time, culminating in shifts of up to 16 hours per day, six to seven days a week. They all received salaries, which were often paid many weeks late, and various amounts were deducted for random expenses. The employees were required to use their own vehicles and cover expenses for work-related travel.

There were no direct threats from the employer, but the employer was well aware of the war in Ukraine and that the employees needed to send money to relatives at home. If employees refused to come to work when ordered, they faced financial penalties, meaning they were not paid at all.

At the time of writing this report, an investigation into the situation was ongoing, but it was not characterised as involving human trafficking.

Recommendations

- To continue to reduce vulnerability to human trafficking and other forms of exploitation, as well as people's reliance on nefarious individuals, states should ensure effective assistance and protection is provided – and continued - for all refugees and internally displaced people without discrimination. Such measures should include safe and sustainable housing and access to decent work.
- The fundamental needs of displaced persons and refugees, including reception, integration and psychological needs, must be met by ensuring immediate access to healthcare, including reproductive healthcare services, psychosocial support, and trauma care, while also addressing access barriers to assistance and protection. Moreover temporary state refugee facilities and shelters must be safe and well protected, particularly from access by unauthorised persons.
- The Temporary Protection Directive should be adequately applied, and its extension beyond March 2026 must be secured, should the war continue, including pathways to long-term residence. For refugees who fall outside the temporary protection system, access to international protection must be ensured.
- States should continue to provide centralised official information, including awareness raising on the risks of human trafficking, not only for displaced people from Ukraine, but for all refugees and migrants. Moreover states should invest in and reach out to vulnerable groups and recognise their specific vulnerabilities to human trafficking. This should include online outreach, providing information and support to refugees and migrants about employment offered online.
- Decent employment for displaced people and refugees should be promoted with government assistance and states should monitor, collect and analyse data related to online employment offers in order to reduce the risk of labour exploitation. Government agencies tasked with labour regulation in European countries should devote specific resources to monitoring recruitment of TCNs, including displaced persons.
- Cooperation with trade unions and migrant rights groups should be established and strengthened to ensure adequate referral of exploited refugees and other migrants. Moreover the outreach and assistance work of CSO should be funded.
- More efforts are needed to ensure the private sector is better informed of the risks of trafficking in human beings and contributes to awareness raising, especially in high-risk sectors, such as agriculture, the meat sector, construction, hospitality, cleaning services, care work and domestic work, amongst others.
- Labour inspectorates should ensure they have sufficient capacity to check the labour situations of displaced persons and refugees, and recognise that high-risk labour sectors need checking more frequently.
- The upcoming EU Strategy on Combating Human Trafficking and national action plans and strategies should include emergency measures to be taken in case of war, conflict or other emergencies, and should ensure provisions for large groups of displaced persons.

Exploited Lorry Drivers

Vania and others

Three Ukrainian lorry drivers, Vania and two others, residing in a country neighbouring Ukraine, contacted our member organisation because of unpaid wages. They all benefited from temporary protection and found the job through an advertisement. The drivers reported that their employer continued to hire new staff while making hollow promises to pay former and current workers, blaming late payment from a client for his inability to give them their wages.

While gathering the necessary paperwork, the NGO learned that their clients were already working with a local integration centre. The centre informed them that the same company had stranded dozens of drivers and that it was already preparing a mass proposal for insolvency proceedings against the company. However, the situation for the drivers was critical, given that they had not been paid for months. In some cases, those who had no place to live were sleeping in their trucks without any money for food. Moreover, some of the Ukrainian drivers had signed agreements (reportedly 'skills enhancement agreements') stipulating they must pay the employer 3,370 euros if they left before completing two years' of employment. Our member organisation was also informed that some drivers were stranded without resources while delivering goods throughout Europe. The employer had blocked their fuel cards, leaving them without access to fuel, food, or accommodation, and they lacked both the resources and means to return home.

When some employees formally resigned, they were either evicted from their accommodation or had their trucks (where some of them were also sleeping) confiscated. At the time this report was written, there was no ongoing investigation, however, the labour inspectorate was examining the case, and insolvency proceedings had begun.