GLOBAL INITIATIVE
AGAINST TRANSNATIONAL ORGANIZED CRIME

THE VULNERABLE MILLIONS

ORGANIZED CRIME RISKS IN UKRAINE'S MASS DISPLACEMENT

MARCH 2023

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Cover: Evacuees fleeing the city of Irpin, north-west of Kyiv, 7 March 2022.
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INTRODUCTION: TRAGEDY AND OPPORTUNITY

On 24 February 2022, Russia launched a full-scale invasion of Ukraine that was clearly designed to bring the country to its knees. An armoured column almost 65 kilometres long headed for the centre of Kyiv, with President Volodymyr Zelensky claiming that Russian special forces had infiltrated the city and were hunting down the country's leaders. Fierce fighting was reported across the north, east and south of the country, centring on the major cities of Mariupol, Kherson and Kharkiv. Russian missiles pounded apartment blocks, schools and hospitals. The fall of Ukraine seemed inevitable.

Faced with this threat to their homeland, millions of Ukrainians fled in fear of their lives. Some moved to regions further away from the ever-encroaching front line, others headed for the border with Poland, Hungary, Moldova, Romania or Slovakia: the gateways to the EU. At crowded train stations, husbands, fathers and sons said goodbye to their loved ones, prevented from leaving by Kyiv's order to mobilize. Ukraine was on the move, at a speed and scale beyond anything witnessed in Europe since the Second World War.[1]

Behind the statistics were countless individual stories of tragedy and hardship. Often taking only what they could carry, these refugees and internally displaced persons (IDPs) struck out without knowing what awaited them. They left behind jobs and education, family and friends, unsure when they would be able to return, or what would become of their country in the interim. Henceforth, these vulnerable millions would be reliant on the kindness of strangers to survive.

But amid this tide of vulnerability, there were those who assessed the situation in a very different light. 'For predators and human traffickers,' said UN Secretary-General Antonio Guterres in March 2022, 'war is not a tragedy. It is an opportunity.'[2] This report will assess the extent to which those criminal actors succeeded in exploiting the opportunities within Ukraine and in Europe in 2022 – and where future risks may lie.

Refugees from Ukraine queue to board buses outside a train station near the Ukrainian–Polish border in March 2022. Millions have fled Ukraine since the start of the Russian invasion in February 2022.
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Crimes of the shadows: Human trafficking and smuggling

Human trafficking and human smuggling encompass an array of very different crimes, each of which requires their own responses. Human trafficking crimes are predicated on the exploitation of people to render various services under duress, using threats, violence or manipulation.[3] Trafficking may take place within a country or transnationally, in a single room or in a factory (or other large-scale place of work), where exploitative conditions are baked into business models and 'employees' have no legal recourse or viable opportunity to escape. The cyber sphere has also become increasingly significant in regard to sexual exploitation, enabling traffickers to reach a global marketplace from a fixed location.

Human smuggling, by contrast, is at heart an arrangement between client and service provider, who will assist the client in overcoming obstacles to movement, be these geographic, legal or political. (It should be noted that consent is not a discriminating factor between trafficking and smuggling: trafficking victims may give 'consent', while smuggled people may be escaping from desperate conditions with no other alternative but to move.)

Yet for all their differences, these two areas of crime are highly mutable and share several areas of overlap. The same routes, means of transportation and even criminal actors may be involved in smuggling and trafficking.[4] This mutability is reflected in the fact that one form of crime can merge into the other. Owing to their highly vulnerable situations, smuggled 'clients' may be trafficked on their journey, even at the hands of their former smugglers.

Detection of victims is also very difficult, given that traffickers work to prevent their victims from speaking out or seeking help – indeed, many victims are not even be aware that the exploitative

A father joins hands with his family through the window as he says goodbye at the central train station in Odesa on 7 March 2022. *© Bulent Kilic/AFP via Getty Images*

conditions under which they are living or working are in fact a form of human trafficking. As such, trafficking may take place in the shadows for years before trends are detected. The wide range of trafficker actor types also makes this a difficult crime to address: some traffickers may be professional criminals, highly organized and operating as part of transnational syndicates, others may be parents sexually abusing their children and uploading the footage online. Moreover, as the context of the Russo-Ukrainian war highlights, states themselves may be the direct sponsors of human trafficking, in contravention of international law.

Raising the alarm in 2022

The risks of human trafficking were quickly flagged by many in the international community in the early days in the war, for two reasons. Conflict has long been recognized as a driver of trafficking,[5] both in the shape of non-conflict forms (such as labour and sexual exploitation) and conflict-specific types (such as the recruitment of child soldiers). Indeed, such trends have been witnessed in Ukraine itself since 2014, with the outbreak of Donbas conflict and Russia's illegal annexation of Crimea. These events displaced some 1.4 million people,[6] fuelling an increase in sexual and labour exploitation in Russia, Ukraine (including the so-called people's republics of Luhansk and Donetsk – LDNR) and Europe.[7] In Russian-controlled areas, children were reportedly used in the armed conflict as fighters and to serve as guards, mail persons and secretaries.[8]

The second reason for concern is based on the deeply entrenched nature of these crimes within Ukraine before the invasion. According to the Global Initiative Against Transnational Organized Crime (GI-TOC)'s Global Organized Crime Index 2021, human trafficking and smuggling were respectively the first and second most pervasive illicit markets in Ukraine prior to the Russian invasion, with the country a prominent source, transit and destination node for various crime types, including forced labour and sexual exploitation.

It was therefore clear that swift action was required to prevent the humanitarian crisis from becoming a criminal bonanza. With unprecedented speed, the EU agreed to activate its Temporary Protection Directive (TPD) in March 2022, which granted Ukrainian refugees the right to a residence permit, access to the labour market and housing, medical assistance, and education for children in any EU country.[9] Then, in May 2022, it launched the Common Anti-Trafficking Plan to strengthen awareness on the risks of human trafficking, reinforce prevention, enhance law enforcement and judicial responses and improve the identification, support and protection of victims, as well as address trafficking risks in Ukraine and Moldova.[10] On the ground, state agencies, NGOs, civil society organizations and private volunteers sought to limit opportunities for exploitation at reception centres and other vulnerable nodes, through the provision of support and information. Vast quantities of financial aid flooded in: as of February 2023, the EU had dispersed €17 billion in support for member states hosting refugees.[11]

Yet although much excellent work has been done, it is undeniable that the war has also hindered the delivery and availability of and access to institutional support and/or domestic and state-led protection mechanisms, including child protection systems, social safety nets and anti-trafficking responses.[12] Some anti-trafficking Ukrainian and Polish civil society actors switched to providing humanitarian responses and emergency support to displaced populations, diverting attention and resources from anti-human trafficking initiatives.[13] Many NGO staff based in Ukraine reported that they too had become IDPs, impacting their ability to continue their work.[14] On 4 March 2022, Ukraine sent a communication to the UN stating that it would be 'unable to guarantee the full implementation of its obligations' under the UN Convention against Transnational Organized Crime Human Trafficking Protocol, due to Russian aggression and the imposition of martial law, until the territorial integrity of Ukraine is restored.[15] The general conditions of war have also made investigating such crimes a highly challenging task, particularly in eastern Ukraine, where the majority of IDPs are based and fighting is concentrated.

At the time of writing, the extent to which this vast new pool of vulnerability was exploited by human traffickers and smugglers in 2022 remains little understood. There were many instances of opportunistic trafficking of IDPs in Ukraine and refugees across Europe, but little in the way of hard data on trends. Given the above-mentioned difficulties in detection, however, a lack of evidence does not necessarily indicate a lack of criminal activity.[16] The fragmentary patterns seen in 2022 – outlined in the sections below – may represent the tip of the iceberg, the scale and severity of which will only reveal itself in the coming months and years. It is also true that trafficking risks are likely to increase in the coming months and years as state support is rolled back, and refugees and IDPs either allow their registrations with their host countries to lapse, relocate nationally or internationally in the search of a new life, or try to integrate into local economics in ways that risk predation and exploitation.

Overall, it can be argued that the anti-trafficking response may have greatly reduced the space for exploitation in 2022, but the issue of 'delayed risks' is now coming to the fore. How these risks manifest will depend greatly on local context, but it is too optimistic to hope that they can ever be fully contained. The issue of human trafficking in particular will be long-lasting, and states must prepare themselves for sustained levels of engagement and assistance that may prove more challenging to mount as fatigue sets in, priorities change and political will vacillates in the wake of the cost-of-living crisis and high inflation. At the same time, 2022 has proved a set of empathetic strategies to be effective, which may point the way not only for how to address the ongoing Ukrainian crisis but human trafficking and smuggling more generally.

FORCED FROM HOME: RISKS IN UKRAINE

Although much of the world's attention has focused on the millions of refugees heading to Europe, a comparable number of Ukrainians have found themselves internally displaced within their own country, adding to the more than 850 000 already displaced as a result of the fighting in the Donbas since 2014.[17] In addition to IDPs, the conflict has also created millions of in-need non-displaced people (a population assessed at 6.9 million in December 2022), as well as millions of returnees throughout the second half of the year.[18]

Unlike refugees, this population in Ukraine has faced no difficulty with language, but in all other respects their situation is just as serious, if not more so, for many are located in the east, where they are exposed to the dangers of active conflict. Financial hardship is widespread, with 64% of IDPs losing their jobs due to the war, leaving one in five surveyed IDPs with no income.[19] Education has also been disrupted for almost 6 million children in Ukraine,[20] with thousands of educational institutions and facilities damaged and hundreds more totally destroyed.[21] Medicine has become increasingly expensive and increasingly difficult to access in general and particularly for IDPs and those in conflict zones, according to the World Health Organization.[22] According to the UN Office for the Coordination of Humanitarian Affairs, no convoys of humanitarian aid have been allowed to cross the front line since the war began, and constraints to the provision of aid are judged high or moderate in many unoccupied areas bordering the front line.[23] In March 2023, the World Food Programme judged that some 12.7 million people in Ukraine had insufficient food consumption, concentrated in east and central Ukraine.[24]

A large number of actors, especially Ukrainian civil society, have worked to alleviate the suffering of this population in Ukraine, but millions of people have endured extreme deprivation and poverty as a consequence of the Russian invasion. Desperate for money, food and other basics of life, some may have turned to less formal work to survive, leaving them vulnerable to exploitation, or to being preyed upon by traffickers.

The picture for human smuggling is more complex, given the open borders policy of the EU, but the military draft announced by President Zelensky in February 2022 has generated a lucrative new market for conscript smuggling.

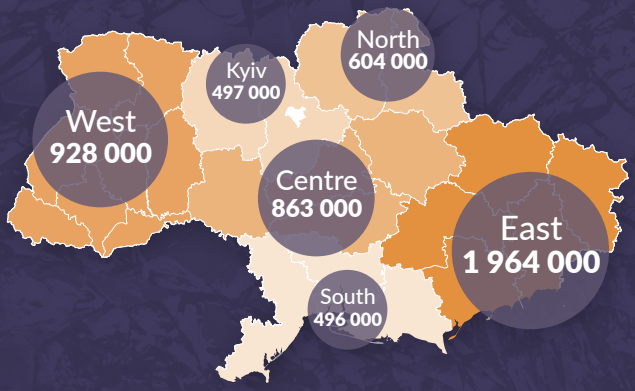
Damaged buildings in Kharkiv, March 2023. © *Jose Colon/Anadolu Agency via Getty Images*

Ukraine's IDPs and returnees as of January 2023

- 5.35 million IDPs as of January 2023.[25]
- IDPs a long-standing and dynamic issue: almost 60% of IDPs displaced for six months or more as of January 2023; 12% displaced within past two months.[26]
- IDPs concentrated in eastern Ukraine, both in terms of most IDPs originating from region and most IDPs hosted in region.[27]

5 352 000 internally displaced (est.)

5 562 000 total returnees (est.)



SOURCE: https://dtm.iom.int/reports/ukraine-internal-displacement-report-general-population-survey-round-12-16-23-january-2023.

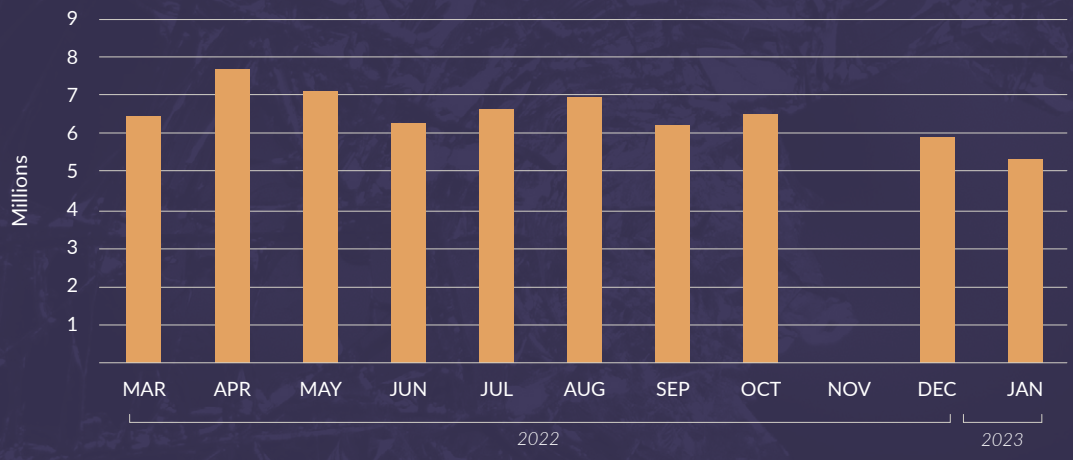


FIGURE 1 Numbers of IDPs due to conflict in Ukraine between March 2022 and January 2023.

SOURCE: IOM Displacement Tracking Matrix, https://dtm.iom.int/ukraine, accessed February 2023. No data round conducted in November 2022.

Human trafficking

As mentioned in the introduction, human trafficking was already deeply embedded in Ukraine before the 2022 Russian invasion. The country was a source, transit and destination point for human trafficking, and one of the largest countries of origin for people subject to forced labour in Europe. Ukrainian women were subject to sexual exploitation, mostly abroad (see box: 'From Odesa to Oslo'). According to the US State Department's 2021 Trafficking in Persons (TIP) report, the main destinations for Ukrainian trafficking victims were Russia, China, Kazakhstan, the Middle East and EU member states, especially Poland and Germany.[28] In addition, some foreign nationals from Moldova, Russia and Uzbekistan were subject to forced labour in Ukraine in the construction, agriculture and manufacturing sectors, and in domestic work.[29]

Overall, an estimated 46 000 Ukrainians were trafficked between 2019 and 2021, among whom 17 000 were exploited within Ukraine and 29 000 abroad.[30] Children were a particularly high-risk population, as Ukraine had among the highest rates of children in state-run orphanages in Europe during this period – over 100 000 children or 1.3% of all Ukrainian children[31] – and several children in institutional care were reportedly trafficked for sexual and labour exploitation, in some cases with the complicity of the officials caring for them.[32]

As such, there were extensive trafficking structures in place to exploit victims within the country and to transport victims abroad at the time of the Russian invasion. How conflict dynamics in 2022 have fuelled human trafficking in Ukraine is not yet clear, but in depriving millions of livelihoods, security, and social and family support, the conflict will have created the ideal conditions for sexual and labour exploitation.

Sex trafficking

Past research into trafficking trends in conflict settings suggests that sex trafficking within Ukraine will see an increase due to heightened vulnerability of women and children, economic downturn and a rise in conflict-related sexual violence. According to a report by the NGO Stop the Traffik, the invasion has fundamentally changed the balance of trafficking in Ukraine: while before the invasion labour trafficking was predominant, now sex trafficking is the foremost type of human trafficking exploitation in Ukraine.[33]

Although evidence for such an increase remains circumstantial, there are telling indicators of the direction of travel. As outlined in the GI-TOC's 'New front lines' report, the first year of the war saw the appearance of English-language listings of sexual service providers in major Ukrainian cities on a massive scale; before the war, these listings had predominately appeared in Ukrainian and Russian.[34] This new dimension suggests recognition of the growing international community in the country, which includes foreign fighters, international organizations and humanitarian agencies,[35] who may be willing to procure sexual services, a proportion of which will be rendered by women in exploitative contexts. This pattern recalls dynamics seen in other fragile contexts, such as allegations of sexual exploitation by Oxfam staff in Haiti in 2011 after the earthquake, including workers sexually exploiting children as young as 12 in exchange for food.[36]

In a superficial analysis, official statistics in 2022 seem to suggest the contrary, showing a downward trend for several forms of sexual violence that may be linked to sex trafficking. There was, for example, a decrease in reported rates of rape in 2022 (250 cases) compared to 2021 (406 cases), while instances of sexual violence remained relatively stable (94 cases in 2022 and 85 in 2021).[37] There was also a

decrease in sex trafficking-related crimes concerning the creation or maintenance of brothels (down to 59 in 2022 compared to 133 in 2021) and pimping (193 recorded instances in 2022 compared to 266 in 2021). The number of reported cases of human trafficking in 2022 (131) also declined compared to 2021 (232), as did the number of detected victims (66 in 2022 compared to 163 in 2021).

These declines are especially noteworthy given the rise in the overall number of crimes in 2022 (from 321 443 in 2021 to 362 636 in 2022), yet war-related crimes may be distorting the reporting picture. Murders soared from 3 191 in 2021 to 21 460 in 2022; firearms-related offences increased ten-fold to over 7 000. Dramatic increases in the number of crimes against national security (17 422 in 2022 from 520 in 2021) and against peace, human security and international legal order (62 128 in 2022 compared to 253 in 2021) also confirm the 'war bump' in the statistics.

From Odesa to Oslo: Transnational sex trafficking

The reach of some sex trafficking operations involving Ukrainian victims was revealed by one investigation in late 2021. In the investigation, Norwegian police uncovered a Norwegian–Ukrainian criminal group that was recruiting women from Ukraine, transporting them to Poland and then Sweden before finally smuggling them across the border into Norway through the forest at night. Once in Norway, the women would work in brothels. Although many of the women came voluntarily (and, the organizer alleged, signed an employment contract), several women claimed they were forced to have sex, and others said they were threatened to prevent them from leaving.[38] A similar network was also uncovered in Sweden in 2021 through the police investigation 'Operation Odessa'.[39]

If law enforcement priorities have aligned with the trend in statistics, it may be that domestic and localized forms of exploitation have been able to operate with less attention and intervention than in past years. As such, fewer cases may not indicate decreased activity. It is also worth reflecting that in a highly volatile context, reporting is fraught with difficulty and complexity, and the published figures cannot hope to be comprehensive. For example, although rape and sexual violence crimes decreased, prosecutors reported in December 2022 that they had documented over 100 cases of sexual crimes as a result of Russian aggression.[40] Subtracting this from the published cases of sexual crimes creates an even larger fall for non-occupied Ukraine in 2022. In addition, there is no data on the territories newly occupied by Russian forces in 2022 (where numbers are likely to be very high). These territories were included in the statistics before the invasion.

As such, it appears that the reporting picture for crimes related to sex trafficking is fragmented and incomplete – not least because human trafficking in general remains a drastically underreported crime in Ukraine. Moreover, the issue of conflict-related sexual violence will only exacerbate the discrepancy between statistics and the true situation.[41] Statistics in wartime are therefore of limited use: as UN Special Representative on Sexual Violence in Conflict Pramila Patten commented, 'If we wait for hard data and statistics [to guide action], it will always be too late.'[42]

A better indication of the trends, prevalence and modus operandi of sex trafficking in 2022 and early 2023 may arguably be found in the reporting of law enforcement interventions, which disrupted several sophisticated schemes of sex trafficking, many of which were based in the capital, Kyiv.

Displaced Ukrainians at the Medyka border crossing in Poland, March 2022. *© Nick Paleologos/Bloomberg via Getty Images*

In November 2022, an investigation in Kyiv detected a criminal group that targeted women who had participated in beauty contests, presented television shows or blogged on Instagram, and offered them modelling work in Morocco. In reality, the women were destined to be sexually exploited in Marrakesh. The group was broken up when police intercepted two traffickers attempting to take 20 women across the border.[43] Another transnational exploitation operation run by a Kyiv resident since 2022 sent women to Lithuania, the UAE and Monaco to render sexual services.[44] In December 2022, an organization headed by a woman who rented some 17 premises for sexual services in Kyiv was broken up. The organizer sought women and girls (including minors) in difficult financial situations, then advertised online for clients.[45]

It is also likely that the trafficking of Ukrainian women has continued to the Gulf states, which were a significant destination for Ukrainian victims before the invasion.[46] Exploitation has also taken place in Israel, where 15 000 Ukrainian refugees without Jewish ancestry have been able to claim only the most limited benefits and are not officially recognized as refugees in the country, leaving them unable to open bank accounts or find legal work.[47] Since sex work is illegal in the UAE and (since 2020) in Israel, the level of criminal involvement is likely to be higher than in countries where sex work is legal.

Not all forms of sexual exploitation will involve such organized arrangements, however. For example, one woman who escaped from occupied territory with her child came to Ternopil Oblast in western Ukraine, where she was offered accommodation in exchange for domestic work. The owner of the house then threatened to evict her unless she paid rent, but the woman had no money and was forced to provide sexual services to be able to stay.[48] This type of 'transactional' arrangement may become increasingly common as desperation increases. A 2022 report by UN Women highlighted that for many women, transactional sex may be one of the few ways they can source food or money for food in the desperate circumstances of war.[49] This carries high risks, given that these women and girls 'are more likely to be sexually exploited and abused and/or trafficked in search of employment or food, exposing them to associated risks, including unintended pregnancies, sexually transmitted infections and HIV, among others'.[50]

Given Ukraine's trafficking history, children will be especially vulnerable to sexual exploitation. According to a government official in August 2022, almost 3 200 children had been left without parental care since 24 February 2022, with 541 cases directly related to the war.[51] Another at-risk group are the thousands of Ukrainian children who have been forcibly deported and sometimes adopted in Russia (see box: 'Conflict-related exploitation').

Other exploitation risks involving children may play out within the home itself, as parents exploit children, either out of extreme desperation or in pursuit of criminal profit. One such instance of the latter came in February 2023, when a woman in Cherkasy was found guilty of trafficking her young daughter, whom she had forced to create pornography with an adult man, which she later sold.[52]

International adoption of orphaned or abandoned Ukrainian children may also be a future risk. According to Ukrainian law, the Ministry of Social Policy[53] is the only legal adoption body in Ukraine: Ukrainian adoption organizations and brokers are illegal, although such organizations and brokers operate internationally to help would-be adopters through the process in Kyiv. According to a Ukrainian researcher on adoption, corruption helps facilitate the placement of many children out of the country, especially in the US, with babies more expensive to secure than older children.[54] US religious organizations play a significant role in helping arrange the transport of Ukrainian children to the US.[55]

International adoption has been banned since the outbreak of the war, but a prominent case emerged in March 2022 of a far-right American pastor, and former state representative, being put under investigation for allegedly attempting to bring 63 Ukrainian children to the US for adoption. The pastor claimed to have worked with a US non-profit that rescued the children from Mariupol, with the children then brought to Poland. But it emerged that the non-profit, which the pastor described as having helped Ukrainian orphans settle in the US for several years, was not registered with the relevant US adoption authorities, raising suspicions that the 63 children were at risk of being illegally adopted into the US.[56]

Forced labour

Before the Russian invasion, 90% of identified Ukrainian victims were reported as being trafficked for labour, the majority in Russia and Poland.[57] Foreign nationals were also brought into the country as forced labour: according to an underworld source, for example, Vietnamese nationals were imported to work in textile factories in Kharkiv and Odesa, where they have been reported sewing fashion labels on counterfeit clothes.[58]

As a result of the conflict, it is likely that many of the routes for the import and export of forced labour have been disrupted, at least in regard to flows to Russia. But the route to Europe will have remained open, with the millions of refugees providing a large pool of potential forced labour (see below: 'Risks outside Ukraine').

Within Ukraine, the risks of forced labour remain acute, although as with sexual trafficking, statistics related to crimes that may be associated with forced labour witnessed a decrease in 2022 compared to 2021. There were decreases in the recorded number of violations of labour legislation (217 in 2022 compared to 296 in 2021) and violations of safety rules during high-risk work (448 in 2022 compared to 874 in 2021), although these categories also do not necessarily imply evidence of forced labour.

Yet setting aside this fall (which, as above, may reflect changing law enforcement priorities), it is clear that the latent conditions for forced labour have only become more pronounced due to the conflict. Some 2.4 million people lost their jobs in 2022 either through displacement or the economic impact

of war, and national income dropped by between 35% and 45%.[59] Ukraine's unemployment rate, which skyrocketed in 2022, is projected to remain high for several years (see Figure 2). IDPs have suffered acutely, having lost both jobs and homes.

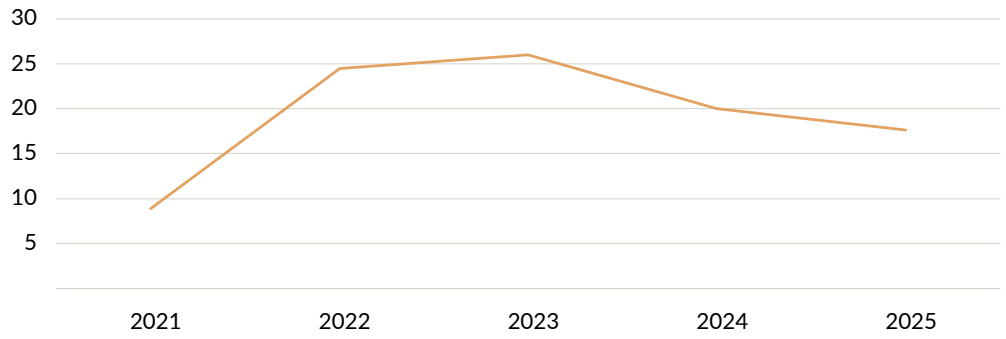


FIGURE 2 Ukraine's unemployment rate, 2023–2025 (projected).

SOURCE: Tatyana Bogdan, Analysis: 2022 Economic Results for Ukraine, Prospects for 2023, *Kyiv Post*, 30 December 2022, https://www.kyivpost.com/post/6264; Interfax, NBU forecasts unemployment in Ukraine to remain at around 26% in 2023, 3 February 2023, https://interfax.com/newsroom/top-stories/87623

In this economic context, offers of quick cash for informal work may be difficult to resist. According to a survey conducted by the International Organization for Migration (IOM), 59% of Ukrainians in 2022 were willing to accept at least one risky offer of work. There was also an increase in the percentage of people who would willingly accept work that clearly constituted forced labour, with 13% of respondents willing to accept 'work in confinement without a possibility to leave the workplace freely' – up from 8% of such respondents in 2021.[60] Such decisions may also be influenced by Ukraine's long-standing tradition of 'undeclared work', with a third of survey respondents in 2017 estimating that at least half of all Ukrainians engaged in undeclared work.[61]

Construction workers rebuild a roof on an apartment building destroyed by Russian shelling. Ukraine's construction sector will be at high risk of forced labour and other exploitative practices.
© Paula Bronstein/Getty Images

The state has been attempting to warn people of the risks involved in such work through an extensive information campaign (see Figure 3). In partnership with the National Police and Ministry of Social Policy, the SURGe project (under the President of Ukraine) has produced dozens of information campaigns and materials.[62] Labour inspectors have also worked to increase the awareness of IDPs regarding searching for safe work, including through the State Labour Service's creation of the www.pratsia.in.ua portal to provide information on employment in war conditions (including on how to recognize forced labour), which had registered 250 000 views by November 2022.[63] But despite such warnings, economic necessity will be the deciding factor for many. A job – any job – will be seen as better than nothing.

The real risks of forced labour may only manifest when reconstruction begins in earnest. The size of the works will be vast and centred on the highly vulnerable construction sector. Under pressure to deliver value for money – particularly if corruption claims a slice of the funds – managers may put increased pressure on desperate workers to work harder, longer and under worse conditions than in peacetime, justified by the shining ideal of rebuilding the country.

Another issue connected to reconstruction will be to find and attract the necessary workforce, given that Ukrainians can earn at least three times as much in neighbouring Poland for the same work in better conditions. This means that local companies may try to use other, informal, incentives such as undeclared 'envelope' salaries. That would mean more risks and less social guarantees for the works, increasing the potential risk of labour exploitation.

FIGURE 3 Official information about the risks of forced labour in Ukraine. For many, however, the urgent need to make a living may impel Ukrainians to set aside such considerations.

SOURCE: Ostroh City Council, Примусова праця: як розпізнати та уникнути, 6 June 2022, https://ostroh-rada.gov.ua/news/469-prymusova-pracia-iak-rozpiznaty-ta-unyknuty.html

A group of Ukrainian women demonstrate in Brussels against war rape in May 2022. © *Thierry Monasse/ Getty Images*

Conflict-related exploitation in Ukraine

Some Ukrainian communities, particularly those close to the front line, will be highly vulnerable to conflict-specific exploitation, including a dramatic increase in sexual violence perpetrated by soldiers (as was seen in the Donbas after 2014).[64] Soldiers in Ukraine are well paid by Ukrainian standards: at the start of the conflict, monthly pay for front line soldiers in Ukraine was increased to 100 000 Ukraine hyrvnias (UAH) (US$3 400 at the time), giving them significant spending power in a country where the official average salary in September 2022 was UAH14 500 (US$360) per month.[65] As well as fuelling a nascent drug economy at the front line, this elevated spending power may give soldiers the financial ability to pay for sex with highly vulnerable women. Foreign mercenaries are particularly likely to seek sexual services, given their lack of national ties that might otherwise act as a restraining measure. The greater use of drugs and alcohol among soldiers will also increase risks of sexual violence and abuse.

There is already evidence of Russia using Ukrainian children as 'spotters' of Ukrainian military movements[66] and engaging in forced adoption of thousands of Ukrainian children into Russia.[67] This issue also emerged post-2014 in the LDNR, when according to Amnesty International, all children in orphanages and institutionalized children with disabilities were transferred to Russia.[68]

Reports have also emerged of civilians being forced by the Russian occupiers to demine and clear rubble in the city of Mariupol, at risk of losing access to humanitarian aid if they refused. If true, this instance of conflict-related forced labour would be a violation of international humanitarian law.[69] Again, there is already precedent for such activity in Ukraine during the Donbas conflict between 2014 and 2022, when there were reports of forced labour of prisoners and civilians in the LDNR.[70]

There are also risks of Ukrainians in occupied territories being forcibly conscripted to fight against Ukraine, especially in the LDNR, where, since 2014, many civilians have been issued Russian passports while de facto being denied Ukrainian citizenship. This is a legal situation that makes them eligible for Russia's draft and therefore potentially forced to fight against what they may consider their true homeland.[71] ■

Human smuggling

Human smuggling was a pervasive illicit market in Ukraine before Russia's invasion in 2022. The country was both a migrant origin country and transit point along the migration route from South East Asia and the Middle East, en route to EU countries, with Poland and Slovakia the main entry points to the EU. Countries of origin for those irregular migrants transiting Ukraine included Afghanistan, Bangladesh, India, Iraq, Morocco, Pakistan, Sri Lanka, Turkey and Vietnam; migrants from former Soviet Union countries, such as Moldova, were also increasing in the period before the invasion.[72]

With entry to Europe facilitated by the EU TPD, demand for human smugglers to arrange passage into the EU for Ukrainian nationals reduced in 2022.[73] The impact on the human smuggling economy may have been substantial: in 2021, more than 3 000 Ukrainians were detected with fraudulent documents at EU borders – accounting for 43% of all detections of fraudulent documents[74] and a clear sign of the scale of human smuggling services before the invasion.

This market will by and large have disappeared, with one significant exception: Ukrainian conscripts. Under Ukraine's general mobilization order in February 2022, all men aged between 18 and 60 were barred from leaving the country. For various reasons, many Ukrainian men were desperate to escape enlistment, and human smugglers were on hand to help service this lucrative new market. Some smugglers also took advantage of the provisions of temporary protection to help smuggle third-country nationals into Europe in 2022.

Conscript smuggling

Many Ukrainian men attempted to flee before they could be conscripted following the February 2022 draft. Moldova, Romania, Hungary and Poland emerged as the preferred exit routes, and demand has been high: between February and October, more than 8 000 conscripted men tried to cross the border, with 245 attempts made to bribe border guards.[75] The early days of the war saw particularly large numbers: in April 2022, the *New York Times* reported that more than 1 000 Ukrainian men had been intercepted and more than 20 smuggling gangs broken up by Moldovan authorities in less than two months.[76] Such is the demand and revenue on offer that some smugglers of alcohol and tobacco have reportedly switched to smuggling conscripts.[77]

The smuggling may be undertaken by one or more facilitators providing a means of transport to conscripts to cross the border (such as a boat[78] or truck), but more sophisticated schemes have also arisen. There has been a brisk trade in falsified documents produced by various official and non-official parties asserting that the bearer is exempt from military service.[79] In February 2023, an organization was exposed that included members of medical institutions and medical commissions who were producing fake documents of military unfitness.[80] Others have sought to exploit loopholes in the conscription law[81] – for example, by organizing a fictious marriage with a women with a disability (as those who engage in constant care are exempt)[82] or by falsifying evidence of a large family (including with photos of children).[83] Details of one sophisticated internal scheme emerged in March 2023, when the Security Service of Ukraine blocked 26 Telegram channels that were helping eligible men avoid conscription without having to leave the country. Using information from local residents, the channels published areas where conscripts were being called up, allowing men in those areas to hide from military officials. After attracting 400 000 subscribers, the channels began offering spots for advertisers.[84]

Corruption is a key enabler of conscript smuggling, with reports of border officials and police being bribed.[85] False data is also entered on to the Shlyah system,[86] which authorizes 'drivers' of humanitarian aid to leave the country for a limited period – smugglers often arrange for two drivers to leave the country but only one returns.[87] Yet while many Ukrainian men are fleeing from a certain danger, their choice is not without risk. One conscript, for example, died in the mountains of Transcarpathia after the smuggler had left his clients to navigate their own way to Romania in April 2022.[88] A longer-term risk is that of social ostracization in Ukraine, where such men have been and will continue to be vilified in some quarters for abandoning their country.[89] For some, return may be impossible; for others, reintegrating will be a steep challenge.

Smuggling of third-country nationals

Although the TPD offered a clear path for Ukrainian refugees to leave the country, other populations in Ukraine faced a more difficult journey to Europe. Unless they enjoyed international protection or held permanent residency in Ukraine, third-country nationals (numbering some 80 000 before the invasion, including asylum seekers and refugees without documents) were not eligible for temporary protection, while even non-Ukrainian refugees with documents faced lengthy delays in obtaining temporary protection.[90] Mixed couples (one Ukrainian and one Russian) from Ukraine also faced obstacles accessing temporary protection in some jurisdictions.[91] Many Roma refugees faced discrimination in reception countries, and many also lacked official documents, which hindered their access to humanitarian aid.[92] There were also reports in the early days of the invasion of Black Nigerian and South African nationals living in Ukraine being denied admittance to Poland in the early days of the war (although these claims were denied by the Polish authorities, who later clarified that Poland accepts 'all refugees at the Ukrainian border, regardless of their nationality').[93]

A tented camp set up along the Ukrainian–Moldovan border. Moldova is one of the preferred exit routes for those fleeing the war in Ukraine. *© Christophe Archambault/AFP via Getty Images*

But these obstacles were gradually resolved in many places, enabling the vast majority of those fleeing Ukraine to access Europe. This in turn provided an opportunity for smugglers to bring new clients into Ukraine, as they could then merge these clients into refugee flows into Europe. In the immediate aftermath of the invasion, there were reports that some smuggled migrants of Vietnamese nationality were reportedly asked to pay between US$4 000 and US$5 000 in order to be smuggled into Ukraine (and then on to EU countries), but were then left stranded in a conflict zone by their smugglers.[94]

The new modus operandi appeared a fruitful one. In February 2023, an in-depth investigation by Átlátszó reported that Hungarian authorities had allegedly (and illegally) banned all non-EU and non-Ukrainian people from crossing into Hungary due to human smuggling concerns. The investigation further found the existence of a purported smuggling scheme that involved would-be migrants applying (often via intermediaries) to universities in Ukraine, who would in turn issue a letter of invitation enabling the applicant to apply for a visa. Migrants would then make their way to Ukraine via Kyrgyzstan and Moldova before crossing into Hungary, with their letter of application acting as sufficient proof of their student status in Ukraine and enabling their transit into the EU under the TPD.[95]

Looking ahead, people smugglers may 'offer migrants currently stranded in Belarus [as a result of the 2021 migrant crisis] viable options to resume their journey or to deflect toward Ukraine to blend in as legitimate workers/residents in the country to move to the EU', according to FRONTEX. Foreign fighters currently in Ukraine and wishing to enter/re-enter Europe also may be another potential client group, say FRONTEX – a flow that may have severe destabilizing effects for internal EU security.[96]

Surrogacy: A grey market

Formally legalized in 2002,[97] Ukraine's surrogacy industry saw an estimated 2 000 to 4 000 births via surrogate mothers every year before the Russian invasion, and before the invasion was the second-largest surrogacy market in the world behind the US, with Ukraine's share estimated at about a quarter.[98] Worth an estimated US$14 billion in 2022, the global surrogacy market is projected to increase in value to US$129 billion by 2032, making Ukraine's share of the industry highly significant in a country where pre-invasion (2021) GDP was approximately US$200 billion.[99]

Yet while commercial surrogacy is legal in Ukraine, unlike in most European countries, surrogate women and the children they give birth to can be highly vulnerable. Surrogate women have reported experiences of poor care in the hands of surrogacy agencies (and are paid a fraction of the agencies' price for the service), and there have also been instances of babies being abandoned by their biological parents or being taken back with the intended parents who later discover that they share no DNA link with the child.[100] Children have also been smuggled out of Ukraine in the face of other countries' refusal to recognize children born to surrogate mothers,[101] while a 2020 investigation exposed a Kyiv gang selling Ukrainian babies to buyers in China.[102] The director of the largest surrogacy agency in Ukraine, BioTexCom, was briefly placed under house arrest in 2019 after suspicions arose of tax avoidance, document forgery and human trafficking, although no charges were ultimately levelled.[103]

Surrogate-born babies, along with the surrogacy centre's nursing staff, live in a makeshift basement shelter in Kyiv after Russia's invasion of Ukraine made it unsafe for the babies' foreign parents to retrieve them. *© Anastasia Vlasova/Getty Images*

This industry has been profoundly disrupted by the conflict, and many surrogates have had to endure extreme stress, hardship and uncertainty.[104] Many new-born babies were housed in bomb shelters, their biological parents unable to come to Kyiv and other cities due to the war.[105] Surrogates have sometimes been forced to move into new legal contexts that criminalize certain aspects of the surrogacy arrangement. In Poland, for example, the birth mother of the child is the legal mother – unlike in Ukraine, where biological parents are legally recognized from the moment of conception. This has resulted in legal complications in cases in which refugee Ukrainian surrogates gave birth in Poland.[106]

How the conflict will affect longer-term trends in surrogacy is as yet unclear. There were concerns that the economic downturn following the outbreak of war in the Donbas in 2014 was pushing vulnerable women with few economic alternatives into the industry,[107] and a similar trend may apply to this phase of the conflict, especially given the above-mentioned rising value of the industry. However, international demand may be supressed, given that many potential foreign clients will be deterred by the volatile situation. ■

A PEOPLE ABROAD: RISKS IN EUROPE

The Russian invasion precipitated a vast movement of Ukrainians and third-country nationals out of Ukraine. More than half a million people fled in the first four days after the invasion;[108] the total number for 2022 was over 8 million. Faced with this wave of human need, the EU was swift in implementing a range of measures to alleviate the crisis. As of February 2023, some 4.8 million Ukrainians had registered for the temporary protection scheme or similar, giving them the right to financial assistance, accommodation, healthcare, education for children and the right to work.[109]

But despite such assistance, Ukrainian refugees still find themselves in a highly parlous state. The dislocation into foreign cultures and languages, lack of funds and a social network, the temporary nature of accommodation and the limitations of a new political identity all serve as powerful impediments to integration. The trauma of escaping war, the trajectory of the conflict in Ukraine and uncertainty over their own future also carry a heavy psychological burden.

In such circumstances, offers of help from strangers might seem a blessing out of the blue. But among the many well-intentioned, there are also those who seek to take more from people who have already lost everything.

Human trafficking

As millions of refugees fled Ukraine, there was a high degree of awareness of how human trafficking risks might manifest.[110] It was, for example, widely recognized that the first arrivals would be most vulnerable to traffickers, given that state agencies and NGOs were still scaling up their response and establishing coordinating mechanisms. In March 2022, EUROPOL issued an early warning notification calling for heightened attention to be paid to border crossing points, reception areas and transit and destination hubs in the EU.[111] The large numbers of unvetted volunteers rushing to fill the capacity gap were a particular concern: Gillian Triggs, the UN High Commissioner for Refugee (UNHCR)'s Assistant High Commissioner for Protection, commented that 'while the generosity and solidarity towards Ukrainian refugees has been inspiring, states must prevent predatory individuals and criminal networks from exploiting the situation'.[112]

This assessment corresponded with reported incidents in the early days of the war of refugees being targeted by individuals offering food, accommodation or transport who would then attempt to exploit

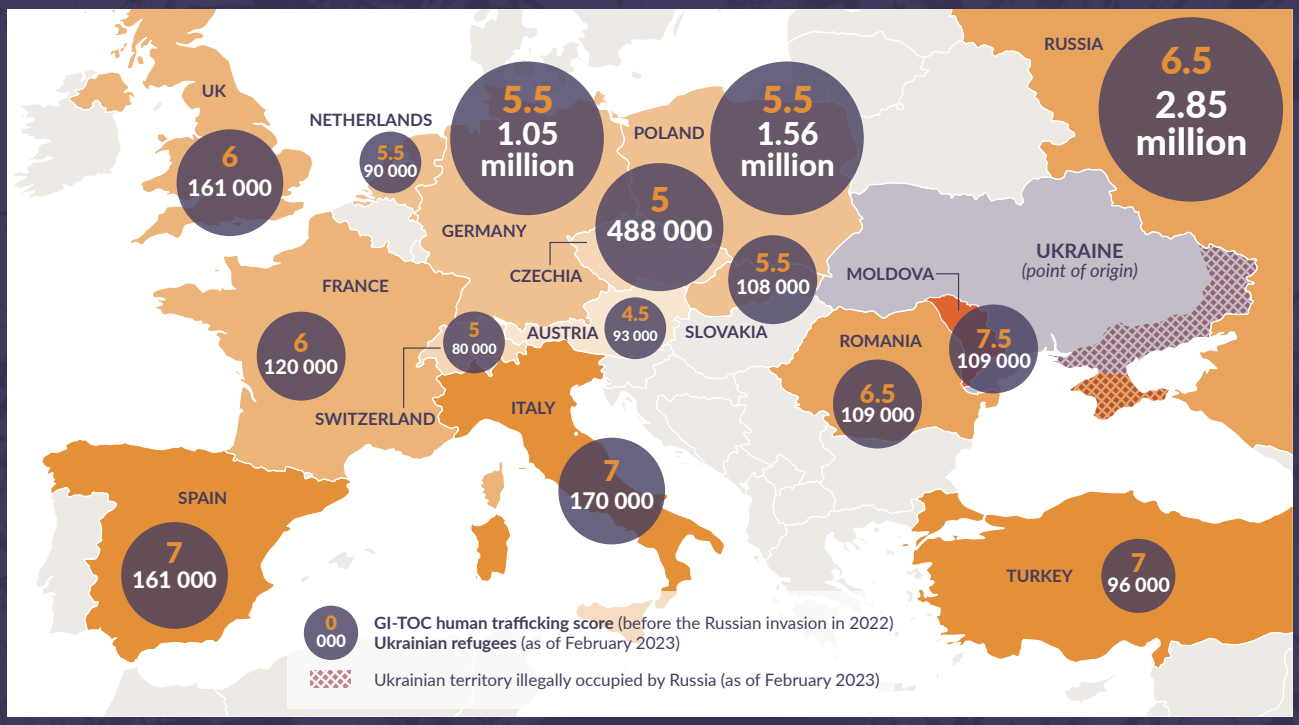


FIGURE 4 Ukraine's refugees and the European human trafficking landscape.

SOURCE: UNCHR, Operational Data Portal, Ukraine Refugee Situation, https://data.unhcr.org/en/situations/ukraine, accessed 13 February 2023; GI-TOC 2021 Organized Crime Index.

the refugees. INTERPOL, for example, received 'reports of human traffickers and smugglers waiting at various border control checkpoints to prey on vulnerable populations arriving from Ukraine' in the early days of the invasion, and deployed a team to Moldova in March 2022 to help manage these risks.[113] In Poland, a Ukrainian refugee reported being offered accommodation in return for housework and sex, while another said she had only been paid a fraction of her wages while working for a Polish company as an undocumented cleaner.[114]

Yet such reports were notably in the minority, and the overarching story of 2022 regarding human trafficking appears to be one of effective prevention, political coordination, information dissemination and broad-based assistance. In Spain, for example, high-level and frequent coordination between various stakeholders helped open large reception centres within days of the invasion; address emerging vulnerabilities (such as those regarding third-country nationals applying for temporary protection); produce information for refugees about the risks of human trafficking; and provide assistance with accommodation, language training and access to work.[115] Across Europe, the establishment of 'Blue Dot' hubs created a network of safe places with support and information.[116] Monitoring of the evolving risk was also high: EUROPOL produced five risk assessments of the potential impact of the war on serious and organized crime in the year following February 2022, including the risks of migrant smuggling and human trafficking.[117] Solutions were quickly found to many challenges faced by refugees in the early months, such as refugees being unable to convert hryvnias into local currency, which was addressed by mid-April,[118] or assisting non-EU and non-Ukrainian refugees to return home.[119]

Yet despite the energy and merits of the approach of many state and non-state actors, which undoubtedly have helped drastically reduce the vulnerability of refugees to human trafficking, a note of caution must be sounded. Although there appear to be few confirmed cases of human trafficking of Ukrainian refugees in Europe, a lack of evidence does not necessarily suggest a lack of activity. Given the challenges of detecting human trafficking, the isolated incidents and activity reported in 2022 (see below) may indicate a much larger base of exploitation, the extent of which will not be known for years to come.

It is also important to note that despite the broad EU stamp on many refugee initiatives – as facilitated by the EU's Ten Point Plan[120] – the benefits on offer to refugees differ from country to country, and these benefits change over time.[121] The financial aid available to many refugees is in some countries very limited and its purchasing power has been eroded by high inflation in 2022. Even in the most generous countries, those refugees who arrived in the immediate aftermath of the invasion are now seeing levels of state aid reduced. Many refugees who are accommodated in private homes (such as in the UK) are also finding that the warm reception has started to cool in the face of local cost-of-living crises and host fatigue. As the refugees are phased into the 'normal' economy, many will find work hard to come by; accommodation difficult to secure; and the trauma of war, language barriers and ongoing financial hardship profound impediments to integration, both economic and social, which will, in turn, heighten isolation and vulnerability.

FIGURE 5 Flyers warning of the risks of human trafficking distributed on the Ukrainian side of the border with Moldova, December 2022.

In addition, as was seen with the Syrian refugee crisis, refugees' calculations become different in the transition to a longer-term view. The war has gone on far longer than expected, the destruction is manifold and many will have lost partners in the fighting. As they realize that they may not return for years, if ever, refugees will start to consider secondary moves, either within the country they are in currently, or to other countries, possibly to reunite with other diaspora family members or to places where they think they will have a better quality of life. It is at this point that they often drop out of the registration system, because there is less value to registering (if refugee benefits have reduced significantly, for example) or because the administrative hurdles of re-registering are too high. The fact that savings will also be running low by this time is also a risk factor.

These secondary movements will force the refugees to endure the psychological impact of dislocation all over again, breaking what fragile ties they may have managed to construct in their initial places of residence and once again raising their vulnerability to exploitation. In unfamiliar landscapes, untracked and with little in the way of financial resources, these refugees will be much more susceptible to entering informal or illegal economies.

These factors all underpin the 'delayed risks' of human trafficking in Europe that may start to manifest in 2023 and beyond – and Ukraine's own recent history may point the way. The true extent of the impact of the 2014 Donbas crisis, for example, only became clear in 2016, when the UN Office on Drugs and Crime (UNODC) recorded a quadrupling of Ukrainian victims in Western Europe (although the usual caveats must be made over increased detection rates versus increased actual incidence of trafficking).[122] Citing this precedent, the UNODC said that human trafficking cases are likely to increase in the near term, and predicted a 5% rise in detections.[123]

Taken as a whole, the human trafficking risks faced by Ukrainian refugees in Europe are not uniform, nor are they static – and the real risk is still to come.

Sex trafficking

The fact that 90% of Ukrainian refugees in 2022 were women and children[124] meant that the risk of sexual exploitation (the most prevalent form of trafficking in Europe in 2021)[125] was a high priority for many stakeholders. The subsequent response may have been effective in reducing such risks – confirmed cases of sexual exploitation of Ukrainian refugees in 2022 have been few and, for the most part, opportunistic – but there have been several incidents that may suggest broader trends.

It was clear, for example, that traffickers were swift to spot the potential opportunity for sexual exploitation of refugees, and took to the cybersphere in an attempt to lure victims. A EUROPOL hackathon in May 2022 that monitored posts regarding transportation, accommodation and work – the three key logistic vulnerabilities of refugees – and various sites focused on either dating, sexual services or job recruitment found 'a significant number of suspicious job offers' targeting Ukrainian women, with some specifying 'photo shoots'.[126]

Another trend that was quickly identified was the phenomenon of fetishizing refugees for sex as a result of their victim status. One widely shared statistic was the 600% spike in Google searches for 'Ukrainian porn' in the early days for the war, but the significant of this metric is difficult to ascertain: the rise may have come from a low base and been distorted by researchers attempting to track trafficking trends, or it may reflect an increased interest that will not necessarily translate into greater demand for sexual services from Ukrainian refugees.[127]

More suggestive of a rise in active demand was a statistic reported by Stop the Traffik concerning a '200% increase in Google searches for the term "Ukrainian escorts" in the United Kingdom between February 27th and March 5th compared to the previous six months'.[128] Further evidence came in May 2022, when Valiant Richey, Special Representative and Co-ordinator for Combating Trafficking in Human Beings at the Organization for Security and Co-operation in Europe, said that one of Ireland's largest escort sites was offering 'men the opportunity to live out their "war-inspired fantasies" with Ukrainian women'.[129] (According to Ireland's *Independent*, the website also claimed that using Ukrainian escorts was a better way of showing 'solidarity' with Ukrainian refugees than watching Ukrainian porn.)[130] While Ukrainian refugees in Ireland may conceivably engage in such sex work voluntarily, the desperation of their situation must be factored in when considering issues of 'consent'. Others will clearly have been trafficked, as shown by an investigation by the Northern Irish police in October 2022, which revealed that cross-border gangs had been targeting Ukrainian refugees for sexual exploitation.[131]

Concrete evidence of this trend of men seeking Ukrainian refugees for sex – and the desperation of refugees being forced into sex work – came in Sweden in March 2022, when a police sweep of 38 men arrested for soliciting sex discovered that 30 had paid for sex with women from Ukraine.[132] Before the invasion, professional Ukrainian sex workers had operated in Sweden, but Swedish police stated that the women now involved in the sex trade had arrived after the invasion – and all had said that the war had driven them into prostitution.[133] According to Swedish media, Ukrainian women made up the majority of all cases of sexual exploitation in the south of Sweden, from five Ukrainian women per year before the invasion to 40 in 2022.[134] In a November 2022 letter to the Swedish prime minister on this phenomenon, MP Annika Hirvonen highlighted that Ukrainian refugees lacked sufficient funds and job support, which could be driving them into exploitative work. Furthermore, Hirvonen's letter warned that stripping those convicted of prostitution of their residence permit (as specified under the Tidö Agreement) and returning them to Ukraine would only further exacerbate their vulnerability.[135]

The trafficking of Ukrainian women in host countries may also have knock-on effects in those countries. According to a sex worker in Moldova, since the Russian invasion, several groups of Ukrainian women have begun selling sexual services in Chisinau.[136] The Ukrainian women are organized by pimps, who are not common in the sex industry in Moldova, as most sex workers are independent operators. If it is perceived that Ukrainian women working under pimps obtain a competitive advantage in the sex industry (for instance, through pimps intimidating other women, 'protecting' women from abusive clients or charging higher prices), then more pimps may emerge in Moldova – and trafficking risks in turn increase.

Finally, exploitation may be taking place in close domestic quarters, as exploiters attempt to leverage offers of accommodation in return for sex. Such activities may have been enabled by loopholes and informalities in state-supervised accommodation schemes that were set up at pace, such as the UK's 'Homes for Ukraine', which matched host families with Ukrainian refugees. Although the British government required adults in a house hosting families with children to undergo an enhanced Disclosure and Barring Service check, there was initial uncertainty surrounding the responsibility of local councils, which at first were only required to make 'best endeavours' over checks.[137] (A June 2022 investigation by Children & Young People Now reported that several councils had raised safeguarding risks over potential sponsors to government authorities, with 29 people flagged on the Police National Computer.)[138] Then in April 2022, the UNHCR warned the UK government that the scheme to was open to abuse over its reliance on the sponsor and refugee making contact over unregulated social

media, such as Facebook, which one NGO said put the scheme at risk of becoming 'Tinder for traffickers'.[139] A report by the British Red Cross in February 2023 also alleged that refugees were being exploited through forced labour and 'debt bondage' by British hosts in the scheme, although cases were reportedly 'small in number'.[140]

Forced labour

In line with the broader trend, there have been few confirmed cases of forced labour among Ukrainian refugees. The European Labour Authority reported no cases of human trafficking or labour market violations in Finland, Italy, Hungary, Lithuania, the Netherlands or Slovakia. No data was available for Germany, as the relevant authority had 'not initiated any criminal investigation procedures of this kind'.[141] One case was reported in Portugal of two Ukrainian women working night shifts and 'not satisfying all contract requirements', and six cases of labour exploitation were reported in Belgium (in a clothing shop and a butchery).[142] There were 22 cases of illegal work of Ukrainian citizens in Czechia, although the majority of these cases referred to administrative irregularities, such as failing to comply with Employment Act registration requirements.[143]

The low incidence of reported forced labour may be due in some part to the fact that many Ukrainians have successfully integrated in many local economies, especially Denmark,[144] the Netherlands, Estonia, Lithuania and the UK.[145] This success may be a result of their high education and skills levels: according to the International Labour Organization, two-thirds of previously working refugee groups have an advanced level of education (tertiary), while 49% and 35.5% were employed in highly skilled and medium-skilled occupations respectively.[146]

But for every success story, there will a refugee whose skills are not recognized, whose trauma makes them vulnerable and who cannot master a new language. Indeed, this last was the main issue cited by Ukrainian refugees (52% of women and 45% of men) who had not worked since the invasion, according to a survey by the EU Agency for Fundamental Human Rights. The same survey found that almost half of Ukrainian refugees (47% men and 49% women) had not worked since leaving Ukraine.[147]

For these refugees, struggling to survive on a minimal state allowance (further eroded by inflation), daily life is hard and getting harder. According to a survey by the Norwegian Refugee Council in February 2023, seven out of 10 Ukrainian refugees in Poland, Romania and Moldova said the income and support they are receiving are not enough to cover their basic needs, with almost half saying that they had skipped meals or cut back their food intake.[148] Assistance is being stepped back in many countries, most notably Poland – host to the largest number of refugees – which amended its Special Act to share costs with refugees. From 1 March 2023, refugees who stay in Poland for over 120 days will be required to cover 50% of their accommodation cost in collective shelters, a share that increases to up to 75% for refugees remaining in the country for over 180 days (effective after 1 June).[149] In other countries, refugees will have to seek accommodation within the often highly expensive private sector – and landlords are likely to refuse to rent to refugees with uncertain income or credit. According to the British Red Cross, homelessness is a key risk facing Ukrainian refugees in the UK in 2023, with government figures highlighting that 4 000 Ukrainian households in England had been homeless or at risk of homelessness at some point in the 12 months following the invasion.[150]

With refugees struggling with financial hardship and new languages, unable to break into the formal labour market, forced to move from one location to another in search of a home, the ideal circumstances for traffickers looking for labour to exploit have been set.

Refugees from Ukraine seeking work at a Polish government organization in Warsaw on 21 March 2022.
© Annabelle Chih/NurPhoto via Getty Images

And the warning signs can already be heard. While the European Labour Authority's figures may have returned few results of law enforcement cases, the word among Ukrainians tells a different story. The EU Agency for Fundamental Human Rights survey found significant experience of forced labour practices among refugees in Europe, with 16% of respondents reporting to having worked very long hours, and 8% saying they had worked without a contract (or one that did not cover all working hours). Exploitation among women had taken place mainly in manufacturing and tourism/hospitality, while most cases of exploitation among men had taken place in construction, manufacturing and transport/logistics (although it should be noted that women accounted for 91% of respondents, given the Ukrainian military draft banning men from leaving the country).[151]

Monitoring these at-risk sectors will therefore be an essential measure, although exposing other forms of forced labour – such as domestic work and forced begging – will prove more challenging. In addition, it may be worth conducting further research in areas with significant Ukrainian diasporas. In these areas, established Ukrainians may act as labour 'brokers' for refugees looking for work, which may potentially lead to labour exploitation.

Human smuggling

As highlighted above, the relaxation of border controls and activation of the TPD will have removed many of the usual drivers of human smuggling activity of Ukrainian nationals in 2022. But there is no shortage of potential international clients for European-based Ukrainian smugglers, who have long had a presence in Europe and the broader region. Before the invasion, highly organized Ukrainian groups arranged for the transport of migrants by yacht from Turkey to Greece and Italy.[152] Police statistics also confirm that Ukrainians were the most-represented smuggler nationality in Czechia in 2022.[153]

It is likely that these networks continued operating in 2022, although there is little available evidence. It should also be noted that Ukrainians may be only low-level operators, such as truck drivers or sailors, who have no real stake in the criminal organization and who may themselves have been tricked into

the trade (reportedly the case for many sailors on the Turkey–EU yacht route). In December 2022, for example, EUROPOL reported that Ukrainian drivers were transporting migrants from Belarus to the EU, but the heads of the network were mainly Syrian and Turkish nationals.[154]

Opportunities for Ukrainian smugglers, and indeed smugglers more generally, are likely to increase in the near future, as the EU attempts to bolster border security to counteract rising irregular migrant flows (see, for example, the EU Action Plan on the Western Balkans that was formulated in December 2022 in response to the 2022 spike in attempted illegal border crossings in the Western Balkans).[155] As history has shown, higher barriers to movement usually have the result of sending more migrants into the hands of smugglers, who may employ riskier methods to deliver their clients to their destinations. Similarly, pushbacks on the Belarus–Poland route may drive migrants to enter the EU via Ukraine.[156]

FUTURE RISKS

It is widely agreed that the best measures to combat human trafficking as a result of the conflict in Ukraine will centre on the continuation and expansion of public awareness, monitoring of high-risk employment sectors, support for vulnerable populations (including gender-sensitive approaches)[157] and assistance to facilitate the integration of refugees. Amid the turmoil of the past year, a diverse set of actors have demonstrated the efficacy of such approaches. Levels of expertise and coordination are high, and there is an extraordinary sense of mission among a broad group of stakeholders. According to one Spanish anti-trafficking NGO, political will to combat human trafficking of Ukrainian refugees will remain strong in the near future.

But it is also widely acknowledged that the situation is highly dynamic and that much depends on the trajectory of the conflict in Ukraine, which will shape criminal risks both within the country and in Europe.

The best-case scenario sees the conflict ending in the near future on terms that are favourable to Ukraine, including at least the LDNR and potentially also Crimea returning under Kyiv's control. With Western backing for reconstruction and Zelensky commanding a victor's support, the urgent repair of Ukraine's social and economic fabric can begin. Billions of dollars in reconstruction will enter the country, providing jobs, homes and upgraded infrastructure, including schools, hospitals and road/rail links. Although, as flagged above, the grand scale and urgency of reconstruction may bring risks of forced labour, in general the restoration of Ukraine will help put a people back on their feet and reduce opportunities for trafficking. Institutional reform may help improve Ukraine's response to human trafficking, which has been consistently cited as failing to meet the minimum standards for the elimination of trafficking in the United States' TIP reports (Tier 2).[158]

A peaceful, stable and economically resurgent Ukraine will not only allow IDPs to return home but is also likely to galvanize the return of more refugees, reducing their vulnerability (although returnees also face trafficking risks, given that they may be returning to destroyed homes and a lack of work, and may have few resources). Vital aid will be able to reach those populations in eastern Ukraine that have suffered the most from lack of services and essentials during the war, including in the former LDNR. Yet these improvements will not eliminate trafficking risks: recovery will take time, and there will be an ample window of opportunity for the exploitation of the millions affected by war.

If conflict protracts, then trafficking risks both within Ukraine and in Europe will increase drastically. Within Ukraine, populations in the eastern battlefield regions, especially women and children, will continue to suffer unimaginable hardship and deprivation. Access to healthcare (including affordability

Zelensky delivers a speech during the international conference of experts for reconstruction in Ukraine, Berlin, October 2022. The conference brought together political and world finance leaders to set groundwork for Ukraine's eventual post-war reconstruction effort. *© Omer Messinger/Getty Images*

of medicines), food, money, accommodation and energy will be daily struggles. The IDP population will remain large and may increase; it may also continue to move, suffering at each juncture the increased vulnerability spike of dislocation. More women will be widowed, leaving them the sole wage earners while in many cases also looking after dependants; more children will be orphaned or lose contact with their parents. But the risks will also be general: as the war continues, Ukraine's economy will suffer more and jobs will become more scarce. Indeed, if fighting on the ground remains localized in the east, then more refugees may return to the western and central regions, putting additional pressure on services and increasing competition for the few jobs available.

The continuation of the conflict will also have a profound impact on refugees in Europe. As mentioned above, the support of states is beginning to recede, leaving refugees to make their own way in unfamiliar landscapes. In highly competitive Western economies these refugees may struggle to translate their pre-invasion skills into fitting employment, forcing them to work lower-paid jobs that either veer into exploitation or do not pay enough to secure private sector accommodation and buy essentials that increasingly rise in price. Homelessness, repeated movements and a hardscrabble existence will force many to the brink – where traffickers will be waiting – so the need to ensure continued and sustained generosity and proactivity to the challenges refugees face will be important for hosting states. This generosity cannot expire too fast.

Domestically, indirect measures to reduce vulnerability to exploitation are likely to be far more meaningful than direct and 'traditional' counter-trafficking initiatives. In the best-case scenario, Ukraine's reconstruction could offer incentives to its returning and internal citizens that directly address basic needs and safeguard self-respect – a guaranteed job and a home – though this will pose obvious implementation challenges in a post-conflict state. Reform of law enforcement and the judiciary will

help improve the country's image both internally and abroad, drawing more investment and improving the quality of life for millions of people on a day-to-day level. Efforts to root out corruption will also help remove protection for organized criminals and exploitative industries alike, as well as ensuing that the state is able to deliver on its reconstruction promises. All these efforts will help reduce vulnerability to trafficking.

But if levels of support and attention fail to keep pace with rising vulnerability; if Ukrainians cannot make headway at home or abroad; if corruption remains a corroding influence on rule-of-law, private sector business and state governance, then opportunities for trafficking are likely to drastically expand.

Finally, it is essential to acknowledge that although this report has considered the risks within and outside Ukraine separately, refugees, IDPs, returnees and non-displaced people in need all share a common vulnerability. Exploitation ultimately knows no boundaries, personal or national: if trafficking rises in Ukraine, those problems will be Europe's problems too.

NOTES

1 Statement by Osnat Lubrani, UN Resident & Humanitarian Coordinator in Ukraine, 'The war has caused the fastest and largest displacement of people in Europe since World War II', UN, 24 March 2022, https://ukraine.un.org/en/175836-war-has-caused-fastest-and-largest-displacement-people-europe-world-war-ii.

2 Inter Press Service, War on Ukraine also an assault on world's most vulnerable people & countries, Global Issues, 15 March 2022, https://www.globalissues.org/news/2022/03/15/30334.

3 The UN Protocol to Prevent, Supress and Punish Trafficking in Persons defines trafficking in persons as 'the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.' See Trafficking-related definitions, Toolkit to combat trafficking in persons, UNODC, https://www.unodc.org/documents/human-trafficking/Toolkit-files/08-58296_tool_1-1.pdf.

4 UNODC, Human trafficking and smuggling: Differences and commonalities, https://www.unodc.org/e4j/zh/tip-and-som/module-11/key-issues/differences-and-commonalities.html.

5 Ella Cockbain and Aiden Sidebottom, The war in Ukraine and associated risks of human trafficking and exploitation: Insights from an evidence-gathering roundtable, Office of the Independent Anti-Slavery Commissioner, 2022, https://www.antislaverycommissioner.co.uk/media/1801/ucl-iasc-2022-roundtable-report-the-war-in-ukraine-human-trafficking-and-exploitation.pdf; Thi Hoang, Human trafficking in the Afghan context: Caught between a rock and a hard place?, SOC ACE Research Paper No. 10, University of Birmingham, 2022, https://www.birmingham.ac.uk/documents/college-social-sciences/government-society/publications/human-trafficking-in-the-afghan-context-paper.pdf.

6 US Department of State, 2021 Trafficking in Persons Report: Ukraine, 2021. https://www.state.gov/reports/2021-trafficking-in-persons-report/ukraine.

7 US Department of State, 2021 Trafficking in Persons Report: Ukraine, 2021. https://www.state.gov/reports/2021-trafficking-in-persons-report/ukraine; 'Slave labour' in the prisons of eastern Ukraine, BBC, 3 October 2016, https://www.bbc.co.uk/news/magazine-37512356; Ukraine: Rebels subject civilians to forced labor, Human Rights Watch, 4 September 2014, https://www.hrw.org/news/2014/09/04/ukraine-rebels-subject-civilians-forced-labor.

8 US Department of State, 2021 Trafficking in Persons Report: Ukraine, 2021. https://www.state.gov/reports/2021-trafficking-in-persons-report/ukraine.

9 European Parliament, Temporary Protection Directive, Briefing, https://www.europarl.europa.eu/RegData/etudes/BRIE/2022/729331/EPRS_BRI(2022)729331_EN.pdf.

10 European Commission, 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, May 2022, https://home-affairs.ec.europa.eu/system/files/2022-05/Anti-Trafficking%20Plan_en.pdf.

11 Infographic - EU solidarity with Ukraine, European Council and Council of the European Union, https://www.consilium.europa.eu/en/infographics/eu-assistance-ukraine.

12 Interviews with anti-trafficking NGOs in Ukraine, April 2022, online, and in person in Warsaw, Poland.

13 All of the interviewed Ukrainian NGOs reported having to switch to offering emergency support, especially regarding providing temporary shelters and food for displaced people; logistical information, evacuation and transport services and support; general information regarding safety, human trafficking risks, and situations in the destination countries; psychiatrist and psychological support for traumatized

people (mainly via operating hotlines). Interviews with anti-trafficking NGOs in Ukraine, April and May 2022, online.

14 Interviews with anti-trafficking NGOs in Ukraine, April 2022, online.

15 UN, Communication: C.N.68.2022.TREATIES-XVIII.12.a, 8 March 2022 (effective 4 March 2022), https://treaties.un.org/doc/Publication/CN/2022/CN.68.2022-Eng.pdf.

16 According to the UNODC's December 2022 update: '[A] dramatic increase in detections of cases of trafficking in persons involving Ukrainian victims has not been recorded. This may be due to the fact that the cases have not yet come to the attention of the authorities. On the other hand, it may indicate that the incidence of trafficking among Ukrainian refugees is relatively low, and that visa-free travel and temporary protection status – with all of the rights attached to the status -, together with the extensive anti-trafficking measures in place in destination countries, have effectively mitigated the risks of trafficking in persons in this context.' See UNODC, Conflict in Ukraine: Key evidence on risks of trafficking in persons and smuggling of migrants, December 2022, https://www.unodc.org/documents/data-and-analysis/tip/Conflict_Ukraine_TIP_2022.pdf.

17 Internal Displacement Monitoring Centre, Country profile: Ukraine, https://www.internal-displacement.org/countries/ukraine.

18 UN Office for the Coordination of Humanitarian Affairs, Humanitarian needs overview: Ukraine, December 2022, p 5.

19 IOM, Ukraine internal displacement report: General population survey - Round 5, 23 May 2022, https://www.humanitarianresponse.info/en/operations/ukraine/document/iom-ukraine-internal-displacement-report-general-population-survey-0.

20 Data Friendly Space, Ukraine conflict analysis brief - The impact of the conflict on children, 20 April 2022, archived at https://reliefweb.int/report/ukraine/ukraine-conflict-analysis-brief-impact-conflict-children.

21 As of 13 June 2022, a total of 1 778 were damaged, among which 194 were totally destroyed; see https://saveschools.in.ua/en. The two oblasts with the most damaged educational institutions and facilities are Donetsk and Kharkiv oblasts, followed by Luhansk, Chernihiv, Kyiv, and Mykolaiv oblasts. See Data Friendly Space, Ukrainian crisis - situational Analysis, 23 May 2022, available at https://reliefweb.int/report/ukraine/ukrainian-crisis-situational-analysis-23-may-2022.

22 World Health Organization, Ukraine after 8 months of war: The health system remains resilient, but key health services and medicine are increasingly unaffordable, 24 October 2022, https://www.who.int/europe/news/item/24-10-2022-accessing-health-care-in-ukraine-after-8-months-of-war--the-health-system-remains-resilient--but-key-health-services-and-medicine-are-increasingly-unaffordable.

23 UN Office for the Coordination of Humanitarian Affairs, Ukraine humanitarian response - Key achievements in 2022, Situation report, last updated 10 February 2023.

24 World Food Programme, Hunger map (accessed 6 March 2023), https://hungermap.wfp.org.

25 IOM, Ukraine — Internal displacement report — General population survey round 12 (16–23 January 2023), https://dtm.iom.int/reports/ukraine-internal-displacement-report-general-population-survey-round-12-16-23-january-2023?close=true.

26 Ibid.

27 European Union Agency for Asylum, IOM and Organisation for Economic Co-operation and Development, Forced displacement from and within Ukraine: Profiles, experiences, and aspirations of affected populations, 28 October 2022, p 3, https://euaa.europa.eu/sites/default/files/publications/2022-11/2022_11_09_Forced_Displacement_Ukraine_Joint_Report_EUAA_IOM_OECD_0.pdf.

28 US Department of State, 2021 Trafficking in Persons Report: Ukraine, 2021. https://www.state.gov/reports/2021-trafficking-in-persons-report/ukraine/.

29 Ibid.

30 USAID, Counter-trafficking in persons factsheet, Country: Ukraine, 11 May 2022, https://www.usaid.gov/sites/default/files/documents/CTIP_eng.pdf.

31 European Parliamentary Research Service, Russia's war on Ukraine: The situation of Ukraine's children, European Parliament, March 2022, https://www.europarl.europa.eu/RegData/etudes/ATAG/2022/729332/EPRS_ATA(2022)729332_EN.pdf.

32 US Department of State, 2021 Trafficking in Persons Report: Ukraine, 2021, https://www.state.gov/reports/2021-trafficking-in-persons-report/ukraine.

33 Stop the Traffik, Ukraine, September 2022, https://www.stopthetraffik.org/wp-content/uploads/2022/09/Commonweal_NGO-1.pdf.

34 GI-TOC, New front lines: Organized criminal economies in Ukraine in 2022, February 2023, https://globalinitiative.net/analysis/organized-criminal-economies-ukraine-2022.

35 Ibid.

36 BBC, Oxfam: UK halts funding over new sexual exploitation claims, 7 April 2021, https://www.bbc.co.uk/news/health-56670162; May Bulman, Oxfam failed to act on reports its workers were raping girls as young as 12, damning report concludes, *Independent*, 11 June 2019, https://www.independent.co.uk/news/uk/home-news/oxfam-child-abuse-haiti-scandal-inquiry-sexual-exploitation-charity-commission-a8953566.html.

37 See General Prosecutor's Office, Про зареєстровані кримінальні правопорушення та результати їх досудового розслідування, https://gp.gov.ua/ua/posts/pro-zareyestrovani-kriminalni-pravoporushennya-ta-rezultati-yih-dosudovogo-rozsliduvannya-2.

38 Sverre Holm-Nilsen, *Bordellet i Oslo*, NRK, 7 July 2022, https://www.nrk.no/norge/xl/avslorte-hemmelig-bordell-i-oslo-1.16009497.

39 Mathias Revheim-Rafaelsen and Sverre Holm-Nilsen, *Svensk politi: Ser flere likheter mellom svenske og norske prostitusjonsnettverk*, NRK, 17 July 2022, https://www.nrk.no/norge/svensk-politi_-ser-flere-likheter-mellom-svenske-og-norske-prostitusjonsnettverk-1.16035305.

40 General Prosecutor's Office**,** Прокурори розповіли учасникам VI Українського жіночого конгресу про розслідуванням злочинів сексуального насильства в умовах війни, 2 December 2022, https://www.gp.gov.ua/ua/posts/prokurori-rozpovili-ucasnikam-vi-ukrayinskogo-zinocogo-kongresu-pro-rozsliduvannyam-zlociniv-seksualnogo-nasilstva-v-umovax-viini.

41 Safe Women, Як ми помиляємося щодо кількості випадків торгівлі людьми і чому, 6 February 2023, https://safewomen.com.ua/ua/news/iak-mi-pomiliajemosia-shhodo-kilkosti-vipadkiv-torgivli-liudmi-i-comu.

42 UN Office of the Special Representative of the Secretary-General on Sexual Violence in Conflict, Briefing of SRSG Patten about Ukraine to the Security Council, 6 June 2022, https://www.un.org/sexualviolenceinconflict/statement/briefing-of-srsg-patten-about-ukraine-to-the-security-council-6-june-2022.

43 General Prosecutor's Office, Вербували жінок для сексуальної експлуатації за кордоном та в Україні – повідомлено про підозру дев'яти особам, 8 November 2022, https://www.gp.gov.ua/ua/posts/verbuvali-zinok-dlya-seksualnoyi-ekspluataciyi-za-kordonom-ta-v-ukrayini-povidomleno-pro-pidozru-devyati-osobam.

44 Наталія Балюх, Продавали жінок в сексуальне рабство: на Київщині викрили канал торгівлі людьми, 1 March 2023, Suspilne Novosti, https://suspilne.media/400877-prodavali-zinok-v-seksualne-rabstvo-na-kiivsini-vikrili-kanal-torgivli-ludmi.

45 Остап Калита, Секс за гроші: У Києві 'прикрили' бордель, 15 December 2022, https://kyiv.depo.ua/ukr/kyiv/seks-za-groshi-u-kievi-prikrili-bordel-202212151444670.

46 New York Centre for Foreign Policy Affairs, Vulnerable Ukrainian women and children are at great risk of being trafficked to UAE, 9 August 2022, https://nycfpa.org/08/09/vulnerable-ukrainian-women-and-children-are-at-great-risk-of-being-trafficked-claims-new-report.

47 Israel deputy mayor investigated for trafficking Ukrainian woman for prostitution, Middle East Monitor, 21 October 2022, https://www.middleeastmonitor.com/20221021-israel-deputy-mayor-investigated-for-trafficking-ukrainian-woman-for-prostitution; Inna Lazareva *(Times of Israel)*, Raped, abused, exploited: Ukrainian women seeking refuge in Israel find no haven, Human Trafficking Search, 4 January 2023, https://humantraffickingsearch.org/resource/raped-abused-exploited-ukrainian-women-seeking-refuge-in-israel-find-no-haven; Ukrainian refugees evicted from state-sponsored housing in Israel, *Jerusalem Post*, 14 December 2022, https://www.jpost.com/israel-news/article-724831.

48 Юлія Пацкаль, Вимушена переселенка потрапила в трудове і сексуальне рабство на Тернопільщині, терен тернопільські новини, 2 December 2022, https://teren.in.ua/news/vimushena-pereselenka-potrapila-v-trudove-i-seksualne-rabstvo-na-ternopilshchini_394141.html.

49 UN Women, Global gendered impacts of the Ukraine crisis, 2022, https://www.unwomen.org/sites/default/files/2022-09/Policy-paper-Global-gendered-impacts-of-the-Ukraine-crisis-en.pdf.

50 Ibid., p 10.

51 З 24 лютого понад три тисячі дітей в Україні залишилися без піклування батьків – соціальна сервісна служба, Radio Liberty, 12 August 2022, https://www.radiosvoboda.org/a/news-dity-bez-pikluvannya-viyna/31985522.html.

52 General Prosecutor's Office, Передавала власну малолітню доньку для сексуальної експлуатації - 8 років за ґратами проведе черкащанка, 17 February 2023, https://www.gp.gov.ua/ua/posts/peredavala-vlasnu-malolitnyu-donku-dlya-seksualnoyi-ekspluataciyi-8-rokiv-za-gratami-provede-cerkashhanka.

53 See Ministry of Foreign Affairs of Ukraine, International adoption, 19 December 2019, https://mfa.gov.ua/en/consular-affairs/international-adoption.

54 Interview with Ukrainian adoption researcher, 6 January 2023, via Zoom.

55 Ibid.

56 Ex-lawmaker who 'engaged in domestic terrorism' accused of trying to bring 60 Ukrainian orphans to US for adoption, *Independent*, 17 March 2022, https://www.independent.co.uk/news/world/americas/us-politics/matt-shea-adoption-poland-ukraine-terrorism-b2038067.html.

57 Suzanne Hoff and Eefje de Volder, Preventing human trafficking of refugees from Ukraine, La Strada, May 2022, p 7.

58 Interview with underworld source, Odesa, May 2022.

59 International Labour Organization, ILO's response to the crisis in Ukraine, February 2023, https://www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---sro-budapest/documents/briefingnote/wcms_867586.pdf.

60 IOM, National survey on people's vulnerability to human trafficking and exploitation in the context of war, October 2022, https://ukraine.iom.int/sites/g/files/tmzbdl1861/files/documents/Survey%20results_ENG_web.pdf.

61 European Labour Authority, Subgroup on tackling undeclared work among displaced persons/refugees from Ukraine, Output paper, November 2022, https://www.ela.europa.eu/sites/default/files/2022-11/UDW_Output%20paper_subgroups_1_%26_2_refugees.pdf, p 17.

62 Світлана Гаращенко, Зло в тіні: чому важливо зробити торгівлю людьми видимою, Pravda

Ukraine, 13 February 2023, https://life.pravda.com.ua/columns/2023/02/13/252817.

63 European Labour Authority, Subgroup on tackling undeclared work among displaced persons/refugees from Ukraine, Output paper, November 2022, https://www.ela.europa.eu/sites/default/files/2022-11/UDW_Output%20paper_subgroups_1_%26_2_refugees.pdf, p 28.

64 UN Office of the High Commissioner for Human Rights, Conflict-Related Sexual Violence in Ukraine 14 March 2014 to 31 January 2017, 2017, https://www.ohchr.org/sites/default/files/Documents/Countries/UA/ReportCRSV_EN.pdf.

65 Government approves UAH 100,000 in salaries for military on the frontline, Ukrinform, 28 February 2022, https://www.ukrinform.net/rubric-ato/3416086-government-approves-uah-100000-in-salaries-for-military-on-the-frontline.html; Середньомісячна заробітна плата за видами економічної діяльності за період з початку року, https://ukrstat.gov.ua/operativ/operativ2005/gdn/Zarp_ek_p/Zp_ek_p_u/arh_zpp_u.htm.

66 Oleksii Reznikov, Twitter, 8 January 2023, https://twitter.com/oleksiireznikov/status/1612022104488124417?s=20.

67 Ministry of Foreign Affairs of Ukraine, Comment of the Ministry of Foreign Affairs of Ukraine on the illegal adoption of Ukrainian children in the Russian Federation, 27 October 2022, https://mfa.gov.ua/en/news/statement-ministry-foreign-affairs-ukraine-illegal-adoption-ukrainian-children-russian-federation.

68 Amnesty International, Ukraine: 'Like a prison convoy': Russia's unlawful transfer and abuse of civilians in Ukraine during 'filtration', https://www.amnesty.org/en/documents/eur50/6136/2022/en, p 26.

69 Michael Schmitt, Ukraine symposium – Forced civilian labor in occupied territory, Lieber Institute, United States Military Academy, West Point, 2 August 2022, https://lieber.westpoint.edu/forced-civilian-labor-occupied-territory.

70 'Slave labour' in the prisons of eastern Ukraine, BBC, 3 October 2016, https://www.bbc.co.uk/news/magazine-37512356; Ukraine: Rebels subject civilians to forced labor, 4 September 2014, Human Rights Watch, https://www.hrw.org/news/2014/09/04/ukraine-rebels-subject-civilians-forced-labor.

71 On 'passportization', see Lily Hyde, Forced to fight your own people: How Russia is weaponizing passports, Politico, 1 January 2023, https://www.politico.eu/article/ukraine-citizenship-war-russia-weaponize-passport-passportization-mobilization-draft.

72 GI-TOC, Criminality in Ukraine, Global Organized Crime Index 2021, https://ocindex.net/country/ukraine.

73 UNODC, Visa-free entry and legal status for Ukrainians in Europe is preventing migrant smuggling: UNODC research, 23 December 2022, https://www.unodc.org/unodc/en/frontpage/2022/December/visa-free-entry-and-legal-status-for-ukrainians-in-europe-is-preventing-migrant-smuggling_-unodc-research.html.

74 Ukraine was also the second-highest country of issuance for fraudulent documents, behind Poland. FRONTEX, Risk Analysis for 2022/2023, pp 49, 51–52.

75 NAZK, 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.

76 Jeffrey Gettleman and Monika Pronczuk, Ukraine's draft dodgers face guilt, shame and reproach, *New York Times*, 11 April 2022, https://www.nytimes.com/2022/04/10/world/asia/ukraine-draft-dodgers.html.

77 GI-TOC, New front lines: Organized criminal economies in Ukraine in 2022, February 2022, https://globalinitiative.net/analysis/organized-criminal-economies-ukraine-2022.

78 General Prosecutor's Office, До 50 000 доларів США за групу військовозобов'язаних – на Закарпатті шістьох осіб затримали на організації переправлення через кордон, 10 February 2023, https://www.gp.gov.ua/ua/posts/do-50-000-dolariv-ssa-za-grupu-viiskovozobovyazanix-na-zakarpatti-sistyox-osib-zatrimali-na-organizaciyi-perepravlennya-cerez-kordon.

79 NAZK, 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.

80 General Prosecutor's Office, Працівників 5 столичних медичних закладів та членів лікарських комісій викрито в організації схеми незаконного перетину кордону, 23 February 2023, https://www.gp.gov.ua/ua/posts/pracivnikiv-5-stolicnix-medicnix-zakladiv-ta-cleniv-likarskix-komisii-vikrito-v-organizaciyi-sxemi-nezakonnogo-peretinu-kordonu.

81 Visit Ukraine, Exceptions: When a man can leave Ukraine under martial law, https://visitukraine.today/blog/102/exceptions-when-a-man-can-leave-ukraine-under-martial-law.

82 General Prosecutor's Office, Фіктивний шлюб для переправлення військовозобов'язаного через кордон – на Житомирщині підозрюють трьох місцевих жительок, 1 February 2023, https://www.gp.gov.ua/ua/posts/fiktivnii-slyub-dlya-perepravlennya-viiskovozobovyazanogo-cerez-kordon-na-zitomirshhini-pidozryuyut-tryox-miscevix-zitelyok.

83 General Prosecutor's Office, Від 6 тис доларів США за довідку про багатодітну родину чи зайняття волонтерством - викрито чергову незаконну схему виїзду за кордон, 31 January 2023, https://www.gp.gov.ua/ua/posts/vid-6-tis-dolariv-ssa-za-dovidku-pro-bagatoditnu-rodinu-ci-zainyattya-volonterstvom-vikrito-cergovu-nezakonnu-sxemu-viyizdu-za-kordon; General Prosecutor's Office, Незаконне переправлення військовозобов'язаних через кордон – підозрюється мешканка Миколаєва, 21 January 2023, https://www.gp.gov.ua/ua/posts/

nezakonne-perepravlennya-viiskovozobovyazanix-cerez-kordon-pidozryujetsya-meskanka-mikolajeva; General Prosecutor's Office, Підробка документів про народження дітей – на Волині викрили схему переправлення військовозобов'язаних черед кордон, 16 November 2022, https://www.gp.gov.ua/ua/posts/pidrobka-dokumentiv-pro-narodzennya-ditei-na-volini-vikrili-sxemu-perepravlennya-viiskovozobovyazanix-cered-kordon.

84 Security Service of Ukraine, СБУ заблокувала 26 Телеграм-каналів, які допомагали ухилянтам уникати мобілізації, 8 March 2023, https://ssu.gov.ua/novyny/sbu-zablokuvala-26-telehramkanaliv-yaki-dopomahaly-ukhyliantam-unykaty-mobilizatsii.

85 General Prosecutor's Office, Хабар за уникнення мобілізації – у Львові викрито поліцейського, 23 January 2023, https://www.gp.gov.ua/ua/posts/xabar-za-uniknennya-mobilizaciyi-u-lvovi-vikrito-policeiskogo.

86 See, for instance, General Prosecutor's Office, Незаконне переправлення військовозобов'язаних під виглядом водіїв-перевізників гумдопомоги - викрито громадянина, 2 February 2023, https://www.gp.gov.ua/ua/posts/nezakonne-perepravlennya-viiskovozobovyazanix-pid-viglyadom-vodiyiv-pereviznikiv-gumdopomogi-vikrito-gromadyanina; General Prosecutor's Office, Незаконне переправлення військовозобов'язаних через держкордон – підозрюється мешканець Запоріжжя, 31 January 2023, https://www.gp.gov.ua/ua/posts/nezakonne-perepravlennya-viiskovozobovyazanix-cerez-derzkordon-pidozryujetsya-meskanec-zaporizzya; General Prosecutor's Office, Незаконне переправлення військовозобов'язаних за кордон через систему «Шлях» - викрито експосадовицю у Чернівецькій області, 1 December 2022, https://www.gp.gov.ua/ua/posts/nezakonne-perepravlennya-viiskovozobovyazanix-za-kordon-cerez-sistemu-slyax-vikrito-posadovicyu-u-cerniveckii-oblasti.

87 NAZK, 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 Security Service of Ukraine eliminated three more schemes for evaders to flee abroad, Odessa Journal, 10 November 2022, https://odessa-journal.com/the-security-service-of-ukraine-eliminated-three-more-schemes-for-evaders-to-flee-abroad; Running away from Ukraine: How men flee from war, Visit Ukraine, 3 November 2022, https://visitukraine.today/blog/1109/running-away-from-ukraine-how-men-flee-from-war.

88 General Prosecutor's Office, Смерть під час спроби перетину держкордону на Закарпатті - судитимуть організатора переправлення військовозобов'язаних, 13 September 2022, https://www.gp.gov.ua/ua/posts/smert-pid-cas-sprobi-peretinu-derzkordonu-na-zakarpatti-suditimut-organizatora-perepravlennya-viiskovozobovyazanix.

89 Jeffrey Gettleman and Monika Pronczuk, Ukraine's draft dodgers face guilt, shame and reproach, *New York Times*, 11 April 2022, https://www.nytimes.com/2022/04/10/world/asia/ukraine-draft-dodgers.html.

90 Katharine Woolrych and Nataliia Krynytska, What happened to the non-Ukrainian refugees from Ukraine?, EU Observer, 24 January 2023, https://euobserver.com/opinion/156632.

91 Interview with Spanish NGO, 2 March 2023, via Zoom.

92 Betsy Joules, Roma refugees who fled from Ukraine to Moldova are now in limbo, NPR, 21 May 2022, https://www.npr.org/2022/05/21/1098489307/roma-refugees-moldova-ukraine-war.

93 Mehdi Chebil, 'Pushed back because we're Black': Africans stranded at Ukraine-Poland border, France24, 28 February 2022, https://www.france24.com/en/europe/20220228-pushed-back-because-we-re-black-africans-stranded-at-ukraine-poland-border.

94 Change your life by crossing the border into Ukraine to run over to Europe as a refugee?, Facebook post, 24 April 2022, https://www.facebook.com/groups/tuongtro.nguoiviet.ukraina/posts/3225377924451455.

95 Orsolya Fülöp, 'Ukraine to Hungry sure shot' – migration loophole at the Hungarian-Ukrainian border to be closed, Átlátszó, 14 February 2023, https://english.atlatszo.hu/2023/02/14/ukraine-to-hungry-sure-shot-migration-loophole-at-the-hungarian-ukrainian-border-to-be-closed.

96 FRONTEX, Risk Analysis for 2022/2023, https://frontex.europa.eu/assets/Publications/Risk_Analysis/Risk_Analysis/ARA_2022_Public_Web.pdf, p 39.

97 Ukraine is among a handful of countries (and certain US states) to have legalized commercial surrogacy, although there are many countries with no legal framework governing the practice, and offers several advantages for would-be parents. Ukraine recognizes the legal right of would-be parents (limited to heterosexual married couples) from the moment of conception, and the costs of a surrogate birth – approximately US$30 000–US$50 000 – is significantly lower than in the US.

98 These numbers are only approximate, as data is incomplete. S Marinelli et al, The armed conflict in Ukraine and the risks of inter-country surrogacy: The unsolved dilemma, *European Review for Medical and Pharmacological Sciences*, 26, 16 (2022), pp 5 646–5 650; Karen Gilchrist, The commercial surrogacy industry is booming as demand for babies rises, CNBC, 7 March 2023, https://www.cnbc.com/2023/03/07/womb-for-rent-more-women-are-working-in-commercial-surrogacy-industry.html; Emma Lamberton, Lessons from Ukraine: Shifting international surrogacy policy to protect women and children, *Journal of Public and International Affairs*, 1 May 2020, https://jpia.princeton.edu/news/lessons-ukraine-shifting-international-surrogacy-policy-protect-women-and-children.

99 Karen Gilchrist, The commercial surrogacy industry is booming as demand for babies rises, CNBC, 7 March 2023, https://www.cnbc.com/2023/03/07/womb-for-rent-more-women-are-working-in-commercial-surrogacy-industry.html; IMF, Ukraine datasets, https://www.imf.org/external/datamapper/profile/UKR.

100 Samantha Hawley, Damaged babies and broken hearts: Ukraine's commercial surrogacy industry leaves a trail of disasters, ABC, 19 August 2019, https://www.abc.net.au/news/2019-08-20/ukraines-commercial-surrogacy-industry-leaves-disaster/11417388; Silvia Blanco, The dark side of Ukraine's surrogacy boom, El País, 1 October 2014, https://english.elpais.com/elpais/2018/09/27/inenglish/1538051520_476218.html; Emma Lamberton, Lessons from Ukraine: Shifting international surrogacy policy to protect women and children, Journal of Public and International Affairs, 1 May 2020, https://jpia.princeton.edu/news/lessons-ukraine-shifting-international-surrogacy-policy-protect-women-and-children; 'This isn't my child – This is my job.' How surrogacy works in Ukraine, Hromadske, 27 April 2020, https://hromadske.ua/en/posts/this-isnt-my-child-this-is-my-job-how-surrogacy-works-in-ukraine.

101 Family held after trying to smuggle surrogate babies out of Ukraine, *The Guardian*, 24 March 2011, https://www.theguardian.com/world/2011/mar/24/family-smuggle-surrogate-babies-ukraine.

102 The gang arranged for artificial insemination of a Ukrainian surrogate, fake marriage documentation and oversaw the birth of the child and childcare. Will Neal, Ukrainian police in baby-mill bust, Organized Crime and Corruption Reporting Project (OCCRP), 29 April 2020, https://www.occrp.org/en/daily/12226-ukrainian-police-in-baby-mill-bust.

103 Lizzie Widdicombe, The stranded babies of the coronavirus disaster, *The New Yorker*, 20 July 2020, https://www.newyorker.com/news/news-desk/the-stranded-babies-of-the-coronavirus-disaster.

104 Susan Dominus, 'It's a terrible thing when a grown person does not belong to herself', *The New York Times Magazine*, 4 May 2022, https://www.nytimes.com/2022/05/03/magazine/surrogates-ukraine.html.

105 Natalie Huet and Naira Davlashyan, Surrogate mothers, babies and frozen embryos trapped by Ukraine war as IVF parents watch in horror, Euronews, 14 March 2022, https://www.euronews.com/next/2022/03/11/surrogacy-in-crisis-as-ukraine-war-leaves-newborns-stranded-in-bomb-shelters-and-families.

106 See, for instance, Surrogacy, Ukraine and me, *Elle*, 21 September 2022, https://www.elle.com/uk/life-and-culture/culture/a41029270/surrogacy-ukraine.

107 Kevin Ponniah, In search of surrogates, foreign couples descend on Ukraine, BBC, 13 February 2018, https://www.bbc.co.uk/news/world-europe-42845602.

108 UN, More than half a million have fled Ukraine, UN refugee agency reports, 28 February 2022, https://news.un.org/en/story/2022/02/1112872.

109 UNHCR, Operational Data Portal, Ukraine Refugee Situation, https://data.unhcr.org/en/situations/ukraine, accessed 13 February 2023.

110 See, for example, the International Organization for Migration, IOM Warns of Increased Risk of Trafficking in Persons for People Fleeing Ukraine, 16 March 2022, https://www.iom.int/news/iom-warns-increased-risk-trafficking-persons-people-fleeing-ukraine; and Kristy Siegfried, Ukraine crisis creates new trafficking risks, UNHCR, 13 April 2022, https://www.unhcr.org/uk/news/stories/2022/4/62569be24/ukraine-crisis-creates-new-trafficking-risks.html.

111 Europol, War in Ukraine – refugees arriving to the EU from Ukraine at risk of exploitation as part of THB, March 2022, https://www.europol.europa.eu/cms/sites/default/files/documents/Early_Warning_Notification__War_in_Ukraine_-_refugees_arriving_to_the_EU_from_Ukraine_at_risk_of_exploitation_as_part_of_THB.pdf.

112 UNHCR, Statement on risks of trafficking and exploitation facing refugees from Ukraine attributed to UNHCR's Assistant High Commissioner for Protection, 12 April 2022, https://www.unhcr.org/news/press/2022/4/6255a6964/statement-risks-trafficking-exploitation-facing-refugees-ukraine-attributed.html.

113 INTERPOL, Ukraine conflict: INTERPOL deploys team to Moldova, 25 March 2022, https://www.interpol.int/News-and-Events/News/2022/Ukraine-conflict-INTERPOL-deploys-team-to-Moldova.

114 Rosie Birchard, Human traffickers exploit desperation of Ukrainian refugees and their children, PBS, 16 November 2022, https://www.pbs.org/newshour/show/human-traffickers-exploit-desperation-of-ukrainian-refugees-and-their-children.

115 Interview with Spanish NGO, 2 March 2023, via Zoom.

116 See https://bluedothub.org.

117 EUROPOL, Europol's support to Ukraine: One year on, 23 February 2023, https://www.europol.europa.eu/cms/sites/default/files/documents/Europol%20Support%20to%20Ukraine%20-%20One%20Year%20On.pdf.

118 Marie Sina, EU proposes solution to Ukrainian refugees' cash problem, DW, 4 April 2022, https://www.dw.com/en/has-the-eu-found-a-solution-to-ukrainian-refugees-cash-problem/a-61351525; European Council, Council agrees recommendation on the exchange of Ukrainian hryvnia banknotes into EU currencies to support people escaping the war in Ukraine, 13 April 2022, https://www.consilium.europa.eu/en/press/press-releases/2022/04/13/council-paves-the-way-for-enabling-ukrainians-to-exchange-their-currency-hryvnia-in-all-eu-countries-at-a-fair-exchange-rate.

119 In 2022, FRONTEX assisted over 1 000 non-EU, non-Ukrainian refugees to return home on voluntary return flight from Poland to Armenia, Azerbaijan, Kyrgyzstan, Tajikistan and Uzbekistan. See FRONTEX, 2022 in brief, https://frontex.europa.eu/media-centre/news/news-release/frontex-in-2022-an-overview-of-the-agency-s-work-last-year-RKxL4B, p 8.

120 European Commission, Ten Point Plan, 26 March 2022, https://home-affairs.ec.europa.eu/system/files/2022-03/The%2010-Point%20Plan-For%20stronger%20European%20coordination%20on%20welcoming%20people%20fleeing%20the%20war%20from%20Ukraine_en.pdf.

121 На яку допомогу можуть розраховувати українські біженці у топ-3 найпопулярніших країн, Word and Deed, 22 November 2022, https://www.slovoidilo.ua/2022/11/22/infografika/suspilstvo/yaku-dopomohu-mozhut-rozraxovuvaty-ukrayinski-bizhenczi-top-3-najpopulyarnishyx-krayin.

122 COVID-19 cut known human trafficking, but Ukraine war a risk: U.N., Reuters, 24 January 2023, https://www.reuters.com/world/covid-19-cut-known-human-trafficking-ukraine-war-risk-un-2023-01-24.

123 UNODC, Global Report on trafficking in persons 2022, January 2023, https://www.unodc.org/documents/data-and-analysis/glotip/2022/GLOTiP_2022_web.pdf, p 56.

124 UNHCR, UNHCR warns of rising needs in Ukraine and neighbouring countries, calls for cessation of hostilities, 18 March 2022, https://www.unhcr.org/en-us/news/briefing/2022/3/623453f14/unhcr-warns-rising-needs-ukraine-neighbouring-countries-calls-cessation.html.

125 Some 56% of trafficking victims were victims of sexual exploitation in 2021, according to EUROSTAT figures. See European Commission, Trafficking victims in Europe, a rise by 10% and the share of EU nationals among the victims increased to 59%, 9 February 2023, https://home-affairs.ec.europa.eu/news/trafficking-victims-europe-rise-10-and-share-eu-nationals-among-victims-increased-59-2023-02-09_en.

126 EUROPOL, Human traffickers luring Ukrainian refugees on the web targeted in EU-wide hackathon, 23 June 2022, https://www.europol.europa.eu/media-press/newsroom/news/human-traffickers-luring-ukrainian-refugees-web-targeted-in-eu-wide-hackathon.

127 Google Trends of the search term 'Ukrainian porn': https://trends.google.com/trends/explore?q=ukranian%20porn.

128 Stop the Traffik, Ukraine, September 2022, https://www.stopthetraffik.org/wp-content/uploads/2022/09/Commonweal_NGO-1.pdf.

129 Ellen Coyne, Irish escort site offered 'war fantasy' sex with Ukrainian women, *Independent*, 20 May 2022, https://www.independent.ie/irish-news/irish-escort-site-offered-war-fantasy-sex-with-ukrainian-women-41669039.html.

130 Ibid.

131 Brian Hutton, Ukrainian refugees targeted by border gangs for sex trade, senior PSNI officer says, *Irish Times*, 26 October 2022, https://www.irishtimes.com/crime-law/2022/10/26/fifteen-northern-ireland-organised-crime-gangs-have-cross-border-footprint-in-the-republic.

132 *30 av 38 män köpte sex av kvinnor från Ukraina*, SVT, 11 April 2022, https://www.svt.se/nyheter/inrikes/30-av-38-man-kopte-sex-av-kvinnor-fran-ukraina.

133 Ibid.

134 *Stor ökning av ukrainska kvinnor som utnyttjas sexuellt: 'Grovt våld'*, 25 November 2022, https://sverigesradio.se/artikel/stor-okning-av-ukrainska-kvinnor-som-utnyttjas-sexuellt-grovt-vald.

135 *Åtgärder mot att ukrainska flyktingar tvingas till prostitution: Interpellation 2022/23:62 av Annika Hirvonen (MP)*, Sveriges Riksdag, https://www.riksdagen.se/sv/dokument-lagar/dokument/interpellation/atgarder-mot-att-ukrainska-flyktingar-tvingas_HA1062.

136 Віолета Колесник, Проституція у Молдові: життя поза законом і мізерні гроші, DW, 31 January 2023, https://www.dw.com/uk/prostitucia-u-moldovi-zitta-poza-zakonom-i-mizerni-zarobitki/a-64555614.

137 Government advice was later updated to require local councils to undertake DBS checks, and in November 2022, councils were given the legal authority to 'request an Enhanced DBS with checks of children's and adults' barred lists for all Homes for Ukraine sponsors and all members of a sponsor's household aged 16 years and over if needed'. See joint letter by 16 organizations to MP Michael Gove, 26 March 2022, https://www.gov.uk/government/news/dbs-to-support-homes-for-ukraine-scheme; UK Government, DBS to support Homes for Ukraine scheme, 21 March 2022, https://www.gov.uk/government/news/dbs-to-support-homes-for-ukraine-scheme; UK Government, Disclosure and Barring Service (DBS) checks: Homes for Ukraine, published 16 January 2023, https://www.gov.uk/government/news/dbs-to-support-homes-for-ukraine-scheme.

138 Fiona Sampson, Homes for Ukraine: Safeguarding concerns for vulnerable refugees, Children & Young People Now, 21 June 2022, https://www.cypnow.co.uk/analysis/article/homes-for-ukraine-safeguarding-concerns-for-vulnerable-refugees.

139 Rajeev Syal, Stop matching lone female Ukraine refugees with single men, UK told, *The Guardian*, 13 April 2022, https://www.theguardian.com/world/2022/apr/13/stop-matching-lone-female-ukraine-refugees-with-single-men-uk-told.

140 Molly Blackall, Ukrainian refugees being exploited through forced labour by Homes for Ukraine hosts, Independent, 24 February 2023, https://inews.co.uk/news/ukrainian-refugees-exploited-forced-labour-homes-ukraine-hosts-2170062.

141 European Labour Authority, Subgroup on tackling undeclared work among displaced persons/refugees from Ukraine, Output paper, November 2022, https://www.ela.europa.eu/sites/default/files/2022-11/UDW_Output%20paper_subgroups_1_%26_2_refugees.pdf, pp 29–30.

142 Ibid.

143 Ibid., p 29.

144 'Over a quarter' of Ukrainian refugees in Denmark now working, The Local, 24 August 2022, https://www.thelocal.dk/20220824/over-a-quarter-of-ukrainian-refugees-now-working-in-denmark.

145 Organisation for Economic Co-operation and Development, What we know about the skills and early labour market outcomes of refugees from Ukraine, 6 January 2023, https://www.oecd.org/ukraine-hub/policy-responses/what-we-know-about-the-skills-and-early-labour-market-outcomes-of-refugees-from-ukraine-c7e694aa.

146 International Labour Organization, The impact of the Ukraine crisis on the world of work: Initial assessments, 11 May 2022, https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_844625/lang--en/index.htm.

147 EU Agency for Fundamental Human Rights, Fleeing Ukraine: Displaced people's experiences in the EU, 2023, https://fra.europa.eu/sites/default/files/fra_uploads/fra-2023-ukraine-survey_en.pdf, pp 43–44.

148 Norwegian Refugee Council, One year on: Seven out of ten refugees from Ukraine risk falling into poverty in neighbouring countries, 21 February 2023, https://www.nrc.no/news/2023/february/ukraine-refugee-survey.

149 International Rescue Committee, Poland: Amendments to Ukrainian refugee hosting laws showcase the need for continued humanitarian support, 27 January 2023, https://www.rescue.org/press-release/poland-amendments-ukrainian-refugee-hosting-laws-showcase-need-continued-humanitarian.

150 UK Parliament: House of Commons, Homes for Ukraine Scheme Anniversary: Volume 728: debated on Wednesday 1 March 2023, https://hansard.parliament.uk/commons/2023-03-01/debates/874C666F-1BB5-44D5-A638-D58E26B288DC/HomesForUkraineSchemeAnniversary.

151 EU Agency for Fundamental Human Rights, Fleeing Ukraine: Displaced people's experiences in the EU, 2023, https://fra.europa.eu/sites/default/files/fra_uploads/fra-2023-ukraine-survey_en.pdf, pp 44–45, 65.

152 Aubrey Belford et al, Tricked into the migrant trade, OCCRP, 20 December 2019, https://www.occrp.org/en/investigations/tricked-into-the-migrant-trade.

153 *Téměř 30 tisíc nelegálních migrantů odhalila loni policie*, Seznam Zprávy, 14 January 2023, https://www.seznamzpravy.cz/clanek/domaci-zivot-v-cesku-temer-30-tisic-nelegalnich-migrantu-odhalila-loni-policie-224095.

154 EUROPOL, 61 arrested so far for smuggling migrants to the EU via Belarus and Russia, 8 December 2022, https://www.europol.europa.eu/media-press/newsroom/news/61-arrested-so-far-for-smuggling-migrants-to-eu-belarus-and-russia.

155 Attempted illegal border crossings in the Western Balkans more than doubled, from 61 735 in 2021 to 145 600 in 2022. European Commission, Infographic - Illegal border crossings on the Western Balkans route, accessed March 2023, https://www.consilium.europa.eu/en/infographics/western-balkans-migration-route; see EU Action Plan on the Western Balkans, https://home-affairs.ec.europa.eu/system/files/2022-12/Western%20Balkans_en.pdf.

156 FRONTEX, Risk Analysis for 2022/2023, https://frontex.europa.eu/assets/Publications/Risk_Analysis/Risk_Analysis/ARA_2022_Public_Web.pdf, p 39.

157 European Parliament, Russia's war on Ukraine: A gender-sensitive humanitarian response, 21 March 2022, https://www.europarl.europa.eu/RegData/etudes/ATAG/2022/729328/EPRS_ATA(2022)729328_EN.pdf.

158 See, for instance, the TIP reports for 2022, 2021 and 2020, all of which cite Ukraine's failure to meet the minimum standards for the elimination of trafficking, although acknowledging that the country is making significant efforts to meet those standards.

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