



GRETA

Group of Experts on Action
against Trafficking in Human Beings

Guidance Note on addressing the risks of trafficking in human beings related to the war in Ukraine and the ensuing humanitarian crisis

GRETA(2022)09

Strasbourg, 4 May 2022

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INTRODUCTION

Under the 2005 Council of Europe Convention on Action against Trafficking in Human Beings (“the Convention”), States Parties have the obligation to take measures in order to prevent and combat trafficking in human beings, even in exceptional circumstances such as war and public emergencies.

Over five million people have been forced to flee Ukraine in the first two months of the war, seeking refuge in neighbouring countries and onwards across Europe. An estimated 90% of them are women and children. In addition, more than 7.7 million people have been internally displaced (Sources: [UNHCR](#) and [IOM](#)). This unprecedented movement of people poses significant logistical challenges for public institutions and aid organisations, in particular in countries bordering Ukraine. Front-line civil society organisations, specialised NGOs and journalists have quickly sounded the alarm over suspected cases of human trafficking among people fleeing Ukraine.

On 17 March 2022, the Council of Europe Group of Experts on Action against Trafficking in Human Beings (GRETA) [called on States to act urgently to protect people fleeing Ukraine from human trafficking](#), and recalled the heightened vulnerability to human trafficking of internally displaced persons. Presumed victims of human trafficking among refugees from Ukraine have already been detected in several states, and there are reports about ongoing investigations. More proactive actions are needed to effectively prevent human trafficking, given the unprecedented arrival of people in need of protection.

In this context, GRETA has decided to issue a Guidance Note on addressing the risks of trafficking in human beings related to the war in Ukraine and the ensuing humanitarian crisis. Its aim is to provide practical advice to help States Parties ensure that public agencies, NGOs, the private sector and the general public are aware of the risks of trafficking in human beings for different forms of exploitation in their dealings with people fleeing the war in Ukraine, and on how to provide support in order to minimise these risks. In order to have rapid impacts, the Guidance Note focuses on actions that can be implemented quickly, without the need of legislative reforms or structural changes.

The Guidance Note addresses a broad range of issues such as registration and safe routes, immediate assistance and integration, information and awareness-raising, detection of potential victims and traffickers, vulnerable groups, as well as co-operation, co-ordination and data collection. It follows on previous work developed by GRETA, notably the [Guidance Note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection](#), and complements recommendations issued by other international actors, such as the [OSCE Special Representative and Coordinator for Combatting Trafficking in Human Beings](#). As the purpose of this Guidance Note is to focus on preventive measures, it does not seek to be exhaustive and does not tackle questions related to, for example, access to justice for victims of trafficking.

GRETA stresses that the risks of human trafficking related to an armed conflict are not limited to the war in Ukraine, nor to Ukrainian citizens. Therefore, the recommended actions contained in this Guidance Note should be applied in the context of any armed conflict and benefit all people regardless of their citizenship. The important challenges posed by the war in Ukraine should be an opportunity for States Parties to design and implement comprehensive strategies to deal more effectively, following a human rights-based and victim-centred approach, with the risks of human trafficking faced by all people seeking international protection.

REGISTRATION AND SAFE MIGRATION ROUTES

Under Article 5 of the Convention, States Parties have the obligation to establish and/or strengthen policies and programmes to prevent trafficking in human beings, and to take measures to enable migration to take place legally. Further, Article 7 specifies that, without prejudice to international commitments in relation to the free movement of persons, States Parties shall strengthen, to the extent possible, such border controls as may be necessary to prevent and detect trafficking. The registration of all people seeking international protection in relation to the war in Ukraine, as well as establishing safe and legal routes for their entry into the country and onward journey, are crucial in order to prevent human trafficking, and remain the primary responsibility of States Parties. Effective registration ensures that all people are known to the national authorities and quickly offered adequate protection and assistance. It also helps identifying at an early stage people who are at high risk of trafficking or have special needs.

Recommended actions:

- ❑ Allocate sufficient human, financial and material resources to ensure effectiveness and timeliness of the registration of all newly arrived people fleeing the conflict in Ukraine.
- ❑ Ensure registration of all people, including those who lack papers to prove their identity or last place of residence in Ukraine, in the first-entry country, and guarantee continuity of the registration system in transit and destination countries. When children are travelling with unrelated adults or there are doubts about the relationship between a child and the adult(s) accompanying them, the authorities responsible for the registration should interview the child separately and conduct the necessary checks.
- ❑ Collect all relevant information during the registration process, in line with privacy and data protection rules, notably contact details and place(s) of stay of the registered person, as well as his or her agreement to be contacted by national authorities at a later stage.
- ❑ Assess the vulnerabilities of people fleeing Ukraine at the earliest stage possible in the registration process through the use of indicators adapted to the current situation, taking into account that Ukraine remains a country of origin of victims of trafficking for different forms of exploitation.
- ❑ With a view to preventing and deterring crimes, increase the presence of trained law enforcement officials, including from specialised anti-trafficking units, at border crossing points, train and bus stations, as well as video-surveillance and identity checks.
- ❑ Establish official and safe travel routes for people seeking refuge, both when crossing borders and within the territory of the host countries, through proactive measures such as humanitarian corridors allowing safe and legal entry and transit, free-of-charge public transportation or state-funded transportation set up by trusted organisations. The need for more co-ordinated efforts in this respect by all Council of Europe member States has been stressed by [the Council of Europe Commissioner for Human Rights](#).

IMMEDIATE ASSISTANCE AND INTEGRATION

The obligation to prevent human trafficking implies that States Parties tackle the underlying causes of human trafficking through social and economic opportunities for vulnerable people, such as people in need of international protection. States Parties should ensure that people fleeing Ukraine, irrespective of their nationality, have the right to international protection based on national and international instruments, such as the European Union (EU) Temporary Protection Directive. This right to protection entails immediate assistance, the right to regularly reside in the country, economic and social rights such as access to the labour market, housing, health care and social welfare. GRETA notes that non-Ukrainians are excluded from temporary protection under the EU Directive if there are "safe and durable conditions" for their return to their country of origin, which might increase the risk of trafficking if the conditions for their return are too quickly and wrongly evaluated. In this context, GRETA stresses that the right to immediate assistance must not depend on nationality.

There have been reports of individuals offering transportation, accommodation or work in exchange for sexual or other services to people fleeing Ukraine. Cases have also been reported of Ukrainians seeking refuge who were misled to work without an employment contract and who were subsequently exploited. States Parties must take proactive measures so that assistance and protection are provided by trusted people and in a safe environment.

Recommended actions:

- Promote safe practices by private individuals and organisations offering assistance to people fleeing the war in Ukraine. Good practices include the vetting and official registration of all volunteers, individuals, organisations and private companies offering and providing accommodation, transportation and/or work, as well as the promotion of safe staff recruitment (through identity check and interview of candidates) and codes of conduct.
- Provide immediate cover of urgent and basic needs, such as food, water, housing, clothing and medical assistance, to all people fleeing the war in Ukraine, irrespective of their nationality.
- Ensure sufficient public human, material, and financial resources so that the provision of immediate and long-term assistance does not rely mostly on private or non-governmental initiatives.
- Provide ongoing advice and support to private individuals who host people fleeing the war in Ukraine.
- Ensure that reception and accommodation centres are located in areas which are safe and accessible to relevant services, including health, social assistance and schools.
- Provide legal status and residence permit without undue delay to all people entitled to international protection following the war in Ukraine.
- If a State decides not to grant international protection to non-Ukrainian citizens on the ground that they can return to their countries of origin, ensure due assessment of the possibilities for the effective, safe and durable return of the persons concerned.
- Guarantee the right to work and ensure work opportunities for people entitled to international protection. Set up job placement schemes, counselling and vocational training through labour and employment services, and encourage employers to recruit qualified workers among refugee population, enabling validation of their skills, educational and professional backgrounds.
- Raise awareness among the private sector on what constitute acts of trafficking in human beings, the liability of legal entities in this regard, as well as how to establish safe methods of recruitment of people entitled to international protection.
- Enable easy and free access to health services, including sexual and reproductive health care, and psychological support, including to those who have been victims of sexual violence.
- Promote integration by providing local language teaching, cultural and social inclusion, schooling and pre-school care for the children.
- Develop coordinated plans with civil society for providing safe housing, food, psychological and medical assistance, social services, interpretation and provision of information on trafficked persons' rights, with particular attention in cases where children are involved.

INFORMATION AND AWARENESS-RAISING

Under Article 5 of the Convention, the obligation to effectively prevent trafficking in human beings involves information, awareness-raising and education campaigns in particular for people vulnerable to trafficking. Article 6 also obliges States Parties to adopt and strengthen measures to discourage the demand that fosters exploitation. Providing information to people fleeing Ukraine at the earliest possible stage about their rights, support services and work opportunities and raising awareness among them about the risks of exploitation in different economic sectors, including sexual exploitation, are crucial, especially given that misinformation is being spread widely.

Recommended actions:

- ❑ Inform people fleeing the war in Ukraine about the risks of being trafficked for different forms of exploitation (sexual exploitation, labour exploitation, forced begging, forced criminality, organ removal, illegal adoption, abuse of surrogate motherhood...). The information should be provided at all different stages, including within Ukraine, at borders, during registration and in accommodation centres. Good practices include the dissemination of leaflets in different languages, including Ukrainian and Russian, with examples of suspicious practices, advice on the conduct to adopt and details of whom to contact.
- ❑ Disseminate widely information on the requirements for obtaining protection status and the rights to assistance, through regular media channels, social media, specific websites and posters on locations where persons fleeing the war in Ukraine are present, such as border crossing points, schools, churches, markets, information and cultural centres, parks, public transport, etc.
- ❑ Provide information on the national requirements for legal presence in the country to persons fleeing the war in Ukraine, including people who lost their ID while fleeing the war.
- ❑ Reinforce existing hotlines and/or set up as a matter of urgency new contact points and helplines, available 24/7, where relevant information is provided and potential cases of trafficking and exploitation can be reported, including in Ukrainian and Russian.
- ❑ Provide easily accessible information on labour rights and employment procedures in the host country, pointing out the importance of having an official employment contract drawn up in a language which can be easily understood by the employee.
- ❑ Organise awareness-raising campaigns, both online (using social media, messaging services such as Viber and Telegram, and specialised websites) and offline (e.g. in public transportation and public places where people fleeing Ukraine may see the information) on the risks of responding to false job offers. Special attention should be put on the method of job-fishing with targeted messages (via messaging services and social media) proposing well-paid part-time or home-based jobs.
- ❑ Raise awareness of the general public on the risks of trafficking in human beings in the context of the war in Ukraine and the conduct people should adopt when suspecting a potential case of trafficking.

DETECTION OF POTENTIAL VICTIMS AND TRAFFICKERS

Under the Convention, States Parties have the obligation to identify victims of trafficking, including among people fleeing the war in Ukraine. Attention must be paid to all forms of exploitation that might target this particular group of people, that is to say not only sexual exploitation but also forced labour, domestic servitude, forced criminality (e.g. pickpocketing, theft, cannabis cultivation), forced begging, as well as organ trafficking. GRETA has underlined the [growing trend of trafficking in human beings occurring online and/or facilitated by new technologies](#), which is of particular relevance in the context of people fleeing the war in Ukraine.

Recommended actions:

- ❑ Allocate additional human, financial and material resources to the relevant authorities (border guards, asylum officers, law enforcement officers, labour inspectors...) to strengthen their capacity to proactively detect exploitative situations and identify presumed trafficking victims among people who have fled the war in Ukraine. Provide them with specific training on the vulnerabilities and risks of people fleeing the war in Ukraine, red flags and indicators of human trafficking, and how to refer presumed victims to assistance and protection.
- ❑ Raise awareness among all front-line responders and professionals involved in the registration, assistance and integration of people fleeing the war in Ukraine – in particular volunteers, hotel personnel, social workers, health-care staff, local officials, teachers – about the risks of trafficking in human beings and exploitation. Provide them with easy guidance, tools and indicators on how to

detect potential victims of trafficking in human beings, notably among children, and how to react in such cases.

- Ensure that the National Referral Mechanism (NRM) is applied in all cases where presumed victims of trafficking are detected among persons fleeing the war in Ukraine.
- Increase targeted action by labour inspectors to monitor high-risk sectors (such as hospitality, agriculture, couriers, food delivery, cleaning, domestic care, car washes, massage studios), and locations where trafficking in human beings was previously detected. Proactively identify new potentially high-risk locations where exploitation of people fleeing the war in Ukraine might appear and boost inspections there.
- Systematically monitor the internet, using open-source intelligence and screening of job advertisements and sexual services websites, using various technological tools. Police officers and labour inspectorates should develop digital expertise and increase their online presence.
- Establish and disseminate information on safe channels for reporting potential cases of trafficking and exploitation. Ensure that workers who have not obtained temporary protection following the war in Ukraine can safely report abuse at the workplace without running the risk of being reported to the immigration authorities.

VULNERABLE GROUPS

Some individuals and groups are more vulnerable to trafficking in human beings due to their gender, age, or precarious material, physical or psychological situation. In the context of the war in Ukraine, special attention should be paid to unaccompanied or separated children, women, members of ethnic minorities, persons with disabilities, elderly people, and people who have previously been identified as victims of human trafficking by the Ukrainian authorities. GRETA is particularly concerned about numerous reports of the disappearance of children that must be addressed as a matter of urgency.

Recommended actions:

- With a view to preventing the disappearance and abuse of children, ensure as a matter of urgency that all unaccompanied and separated children are registered and benefit immediately from effective protective care arrangements, including safe and specialised accommodation, with trained staff alerted to the risks of human trafficking. Ensure prompt and fluid exchange of information on missing children and develop joint protocols on children who go missing.
- In cases of uncertainty regarding the age of a person, age assessment procedures should be respectful of children's rights in the context of migration and comply with [international standards](#).
- In case of unaccompanied or separated children, a legal guardian should be systematically and promptly appointed. Legal guardians should be informed, and to the extent possible, trained on the particular trauma and vulnerabilities affecting children from Ukraine.
- Guarantee that children have access to health care and psychological support, as well as access to education, vocational training, legal assistance and interpretation.
- Create online and offline child-friendly materials to inform children about the risks of trafficking, including recruitment and exploitation online, and to help them develop skills in identifying and avoiding risks, learning how to protect themselves, where to get support and report abuse. Take steps to prevent online recruitment of children, including by co-operating with Internet service providers. Good examples include providing training on online safety to children, parents and teachers, developing an interactive portal which contains practical advice, and active partnership with Safer Internet Centres in the State Parties where such centres are operational. Reference is made in this context to the checklist issued by [the Lanzarote Committee on protection of children affected by the refugee crisis from sexual exploitation and sexual abuse](#).
- Ensure that the registration process is undertaken in a gender- and age-sensitive manner. To the extent possible, States Parties should increase the presence of female border guard officers, asylum officials, police officers, social workers and interpreters.

- ❑ Provide gender-sensitive housing in state-organised accommodation or in partnership with private entities which have been carefully vetted. Sleeping and sanitation areas for single women (with or without children) must be separated from men, and the entry to and surroundings of women shelters should be secured.
- ❑ Offer assistance and protection to surrogate mothers having fled Ukraine and hosted in countries where surrogacy is not legal, including access to health care and housing. States Parties should take measures to ensure that the impossibility to register the surrogate parents in the children's birth certificate does not lead to unsafe deliveries and trafficking of new-born babies.
- ❑ Ensure that registration, housing, assistance and protection are provided to all people fleeing the war in Ukraine without discrimination, irrespective of their nationality or of being stateless. States Parties should increase the monitoring of possible acts of discrimination and racism against non-Ukrainian nationals and members of ethnic minorities fleeing Ukraine.
- ❑ Immediate assistance, including appropriate housing and medical care, should be provided to elderly people and persons with disabilities, to prevent them from falling victim to trafficking and exploitation.

CO-OPERATION AND CO-ORDINATION

Countering human trafficking and exploitation of people fleeing the war in Ukraine requires collective response and co-ordinated actions by States Parties. In order to effectively prevent trafficking in human beings among people fleeing the war in Ukraine, States Parties should collect and share relevant information, disaggregated by gender, age and other criteria, on suspected and identified cases of human trafficking, in line with data protection rules. Rapid exchange of information between relevant stakeholders, both state and non-state, at national and international level, is crucial to prevent trafficking among people fleeing the war in Ukraine and detect potential victims of trafficking. International co-operation should also facilitate family reunification.

Recommended actions:

- ❑ Establish channels for rapid exchange of information and co-ordination between public agencies, NGOs, private companies and international organisations. Good examples include the designation of contact points in each stakeholder on the managing of the humanitarian crisis and the risks of trafficking in human beings.
- ❑ Set up a multi-disciplinary taskforce (working group) to plan and implement co-ordinated measures to facilitate the provision of assistance to people fleeing the conflict in Ukraine and prevent their exploitation. It should include representatives of relevant ministries, regional authorities, law enforcement agencies, labour inspectorates, employers' organisations, trade unions, civil society organisations and relevant international organisations.
- ❑ Set up partnerships with existing Ukrainian diaspora (communities) in the country and involve them in communication with persons fleeing the war in Ukraine, the provision of assistance and integration.
- ❑ Collaborate with private employers and HR/Job Online platforms for systematic monitoring of job advertisements, especially through the Internet.
- ❑ Collect disaggregated data on people who entered the country as a consequence of the humanitarian crisis in Ukraine, and people who were granted international protection.
- ❑ Collect disaggregated data on presumed and identified victims of trafficking in human beings among persons fleeing the war in Ukraine, as well cases investigated and prosecuted as human trafficking.
- ❑ Monitor and counteract misinformation on the possible negative consequences of registering for international protection and access to assistance such as housing, employment, social welfare, etc.