

Council of Europe Consultation Group on the Children of Ukraine (CGU)



**Special hearing report on
understanding the risks of trafficking
of children of Ukraine, including for the
purposes of sexual and labour exploitation**

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**COUNCIL OF EUROPE
CONSULTATION GROUP ON THE
CHILDREN OF UKRAINE (CGU)**

**Special hearing report on
understanding the risks of trafficking
of children of Ukraine, including for the
purposes of sexual and labour exploitation**

Prepared in collaboration with the
Secretariat of the Council of Europe
Convention on Action against
Trafficking in Human Beings

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Executive Summary

War and mass displacement typically heightens the risks linked to organised crime, particularly human trafficking. This is no different in the context of the war in Ukraine, and as the war continues into its third year, these risks have not disappeared but rather changed form. Children displaced by war are particularly vulnerable to such risks. In response to this alarming phenomenon, the [Council of Europe's Consultation Group on Children of Ukraine \(CGU\)](#) held a Special Hearing on "[Understanding the Risks of Trafficking of Children of Ukraine, including for the purposes of sexual and labour exploitation](#)". This report provides a summary of the key risks and potential mitigation measures discussed during the hearing, outlined in the following table.

Risks	Mitigation measures
Risks Associated with State Collapse, Deterioration of the Rule of Law, and Impunity	Strengthening the systems by involving children in the process and allocating adequate resources
1. Hostile political climate against migrants and refugees	<ul style="list-style-type: none"> • Raising public awareness on the importance of protection of the children of Ukraine
2. Systemic challenges in self-identifying as a victim and reporting	<ul style="list-style-type: none"> • Raising awareness of vulnerable groups and children on how to recognise risks and indicators of human trafficking and where to seek assistance • Raising general public awareness on human trafficking to combat prejudices and misconceptions concerning victims of human trafficking • Raising awareness of children, professionals working with children, and the general public on where to report abuses, obtain information and seek assistance. • Strengthening the accessibility of hotlines and other avenues for reporting abuses of Ukrainian children s
3. Difficulties in obtaining official victim status	<ul style="list-style-type: none"> • Providing support and protection to presumed victims of human trafficking • Reaching vulnerable populations and providing on-the-ground support
4. Lack of resources in State institutions	<ul style="list-style-type: none"> • Allocating adequate human and financial resources to law enforcement authorities for proactive investigations • Establishment of specialised national crime agencies to fight against organised crime for those countries not having specialised departments within the police force • Establishing or allocating adequate human and financial resources to State agencies responsible for the coordination of the fight against human trafficking and the protection of victims • Providing specialised training to law enforcement, joint trainings between different sectors and State agencies, and more generic trainings with other relevant sectors that may encounter potential victims and offenders of human trafficking • Cooperating with relevant stakeholders to ensure effective use of resources • Strengthening international cooperation in the investigation and prosecution of transnational trafficking cases by setting up Joint Investigation Teams (JITs)
5. Lack of national referral mechanisms or deficiencies in implementation	<ul style="list-style-type: none"> • Establishing/strengthening national referral mechanisms for the identification of victims of trafficking and their referral to appropriate assistance and protection in all CoE member States

6. Lack of adaptability to new challenges arising from technological advancement	<ul style="list-style-type: none"> • Allocating adequate human and financial resources to law enforcement authorities for proactive investigations • Creating accessible, child-friendly materials to inform children of Ukraine about risks of online human trafficking • Cooperating with Internet service providers to fight against online human trafficking
Risks Associated with the Displacement of People	Strengthening cooperation and developing a joint action plan
1. Children with disabilities in institutional care	<ul style="list-style-type: none"> • Developing sustainable mid-/long-term protection measures and care arrangements • Enhance inter-agency and international cooperation and collaboration for the vetting, supervising, and supporting of guardians
2. Unaccompanied and separated children	<ul style="list-style-type: none"> • Establishing/Strengthening coordinated cross-border registration, identification, and communication systems • Ensuring that all unaccompanied and separated children of Ukraine have a guardian and enhancing inter-agency and international cooperation and collaboration for vetting, supervising, and supporting guardians • Providing support, protection, and effective care arrangements
3. Relocation of children	<ul style="list-style-type: none"> • Establishing enhanced monitoring mechanisms
4. Missing children	<ul style="list-style-type: none"> • Establishing monitoring and rapid communication mechanisms
5. New wave of migration of 16-18 years old boys	<ul style="list-style-type: none"> • Developing targeted and tailor-made protection and prevention measures
Risks Associated with Humanitarian Need and Socioeconomic Stress	Establishing monitoring mechanism and mid-/long-term plans to ensure sustainable protection of children
1. Conditions in shelters	<ul style="list-style-type: none"> • Reaching vulnerable populations and providing on-the-ground support • Developing sustainable mid-/long-term protection measures and care arrangements
2. Cessation of humanitarian assistance over time	<ul style="list-style-type: none"> • Monitoring the situation to ensure that children and their parents, guardians, or caregivers have access to essential social support services • Developing sustainable mid-/long-term protection measures and care arrangements
3. Conditional access to humanitarian aid	<ul style="list-style-type: none"> • Monitoring the situation to ensure that children and their parents, guardians, or caregivers have access to essential social support services • Reaching vulnerable populations and providing on-the-ground support
Risks Associated with Social Fragmentation and Family Breakdown	Promoting in-school education, community-based psycho-social support, and tailor-made measures
1. Online education	<ul style="list-style-type: none"> • Promoting the importance of in-school education for children of Ukraine to children and their caregivers, legal guardians, parents, and families
2. Social isolation and discrimination	<ul style="list-style-type: none"> • Promoting the importance of in-school education and access to community-based psychosocial support for children of Ukraine to children, their caregivers, legal guardians, parents, and families • Developing targeted and tailor-made protection and prevention measures

Introduction

1. Human trafficking represents one of the gravest violations of human rights, undermining the very essence of human dignity. Trafficking of children is a form of exploitation that infringes on children's rights and inflicts profound, long-lasting harm on both the victims and society. This violation can manifest itself through sexual, labour, and other forms of exploitation, resulting in immediate and enduring physical, psychological, and developmental harms to the victims.

2. Historically, conflicts have exacerbated risks associated with organised crime, including human trafficking. The war in Ukraine is no exception, presenting complex and multifaceted challenges. The conflict has triggered massive displacement, with millions fleeing both internally and internationally in search of safety. This displacement has heightened the vulnerability of those individuals affected. Children under such conditions become more vulnerable, where traffickers operating within organised crime networks can exploit these vulnerabilities.

3. In the early stages of the full-scale invasion of Ukraine by the Russian Federation, Council of Europe (CoE) member States experienced a mass arrival of persons fleeing Ukraine, with over 8 million people having sought refuge across the continent.¹ An estimated 90% of those who have fled the country due to the Russian Federation's aggression are women and children.² Moreover, approximately 7 million individuals have been displaced *within* Ukraine.³

4. Early warnings from organisations like Europol, as well as front-line civil society organisations (CSOs), highlighted the increased risk of trafficking of women and children escaping the conflict.⁴ Various international organisations, national bodies, CSOs and citizens quickly mobilised to provide humanitarian support. The European Union (EU) activated the Temporary Protection Directive to people fleeing Ukraine and the EU Anti-Trafficking Coordinator developed a joint plan to address trafficking risks and support victims in member States.⁵ The International Organization for Migration (IOM) set up a Regional Anti-trafficking Taskforce involving a range of international organisations (including the Council of Europe) and NGOs.⁶ The Council of Europe Group of Experts on Action against Trafficking in Human Beings (GRETA) issued a statement calling on States to act urgently to protect Ukrainians refugees from human trafficking⁷ and a Guidance Note on addressing the risks of trafficking in human beings related to the war in Ukraine and the ensuing humanitarian crisis focusing on actions that can be implemented quickly, without the need of legislative reforms or structural changes. The Committee on the Rights of the Child has issued a call for urgent action to protect Ukrainian children with disabilities in residential care institutions.⁸

¹ United Nations Refugee Agency, Ukraine emergency, January 2023, available at: <https://www.unhcr.org/ukraine-emergency.html>.

² International Organization for Migration, [Human Trafficking in the Ukraine Crisis, Regional Anti-Trafficking Task Force, March 2023](#).

³ International Organization for Migration, Ukraine Internal Displacement Report: General Population Survey, January 2023.

⁴ Europol, [Early Warning Notification - War in Ukraine: refugees arriving to the EU from Ukraine at risk of exploitation as part of THB](#).

⁵ European Commission, [An Anti-Trafficking Plan to protect people fleeing the war in Ukraine - European Commission](#).

⁶ International Organization for Migration, [Human Trafficking in the Ukraine Crisis - Regional Anti-Trafficking Task Force](#), March 2023.

⁷ GRETA, [States must act urgently to protect refugees fleeing Ukraine from human trafficking](#), March 2022.

⁸ UN Committee on the Rights of the Child, [UN experts call for urgent action to protect Ukrainian children with disabilities in residential care institutions](#), October 2022.

5. More than two years after the start of the war, some displaced persons are either returning to Ukraine or continue to move between Ukraine and Council of Europe member States. Even as time passes and circumstances change, the vulnerabilities that make them targets for human traffickers remain. Children of Ukraine, many of whom are separated from their family and social environment, are particularly vulnerable to human trafficking for different exploitative purposes, including forced criminality and illegal adoption. It is therefore crucial that member States provide not only immediate humanitarian assistance but also long-term support and protection.

6. As children increasingly use the internet for education, socialising, and job searching, they face new risks. Traffickers have adapted to the digital environment, using online platforms to groom and exploit children through seemingly safe interactions that can quickly become predatory. This intensifies the already significant challenges faced by authorities and organisations combating human trafficking.

7. While substantial efforts have been made to address human trafficking, the evolving nature of the threat requires ongoing vigilance, cooperation, and innovation to protect the children of Ukraine, who are particularly vulnerable due to the continuing war in Ukraine. Enhancing the capacity of all relevant actors to identify and address these risks is of paramount importance.

8. To support member States and relevant stakeholders in this regard, the **Council of Europe Consultation Group on Children of Ukraine** convened a **Special Hearing on Understanding the Risk of Trafficking of Children of Ukraine**, including for the purposes of sexual exploitation and labour exploitation, at its 3rd Plenary Meeting on 2 July 2024. This report summarises the contributions of the panellists and participants at this special session, which included representatives from CoE member states (including Ukraine), international organisations, and local and international CSOs (see *the Annexe*). The session was also attended by CGU members, relevant professionals from member States, and other stakeholders.

"We know that natural disasters, armed conflicts and any situation of social disorder put children at greater risk of being separated from their parents and protective environment, and of being displaced without the control or supervision of the authorities. These children are easy prey for child traffickers, illegal adopters and more generally for exploitation, including sexual exploitation. We have seen that in the context of all wars, including in Ukraine.

All our senses must be on alert to prevent these risks and protect the children who are victims, rehabilitate them and offer them psychological, legal and social support."

Benoit Van Keirsbilck, UN Committee on the Rights of the Child

I. Legal Frameworks for Protecting Children of Ukraine from Human Trafficking

9. The protection of children of Ukraine from the heightened risks of human trafficking as a result of the full-scale invasion of Ukraine by the Russian Federation is supported by the international legal framework established to combat human trafficking and to protect children's rights. The **United Nations Convention on the Rights of the Child (CRC)** guarantees comprehensive rights for children, including protection from sale and human trafficking, and its **Optional Protocol on the Sale of Children, Child Prostitution, and Child Pornography** specifically addressed child trafficking. Further, the **International Labour Organization Convention No. 182** targets the worst forms of child labour and outlines measures for addressing severe child exploitation, including human trafficking for labour exploitation purposes. During armed conflicts, the **Fourth Geneva Convention and Additional Protocols to the Geneva Conventions** are also relevant as they provide basic protections for civilians and uphold the rights of children even in such dire circumstances, including by providing protection from child exploitation, such as human trafficking.

10. The **Council of Europe Convention on Action against Trafficking in Human Beings** (hereafter: "the Anti-trafficking Convention") has been ratified by all CoE member States and is pivotal in combating trafficking across Europe and beyond. The Convention provides a comprehensive framework for combating trafficking following a human rights-based and victim centred approach. Accordingly, in addition to criminalising human trafficking, States Parties must adopt a range of prevention measures, identify victims and ensure their access to assistance, protection and compensation, punish traffickers, and engage in international co-operation. Failure to comply with the provision of the Anti-trafficking Convention could result in accountability under the **European Convention on Human Rights**.

11. The **Council of Europe Anti-trafficking Convention** has specific provisions related to children. For example, Article 5 requires States Parties to take special measures to reduce children's vulnerability to trafficking, notably by creating a protective environment for them. Article 10 requires States to set up victim identification procedures adapted to the special situation of child victims and to appoint legal guardians to unaccompanied children identified as victims. According to Article 16, the return and repatriation of child victims must comply with the best interests of the child. The **Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (Lanzarote Convention)** further complements these efforts by addressing all forms of sexual offences against children, including those related to human trafficking for sexual exploitation purposes.

12. Within the EU, **Directive 2024/1712 of the European Parliament and Council amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims**, expanded the at-a-minimum list of purposes of exploitation which EU member States must criminalise as part of the definition of human trafficking by including exploitative surrogacy, forced marriage, and illegal adoption. Additionally, it makes establishing referral mechanisms and designating national focal points for the cross-border referrals mandatory for every EU member State.

13. The Council of Europe Group of Experts on Action against Trafficking in Human Beings, GRETA, assesses the implementation of the Anti-Trafficking Convention. GRETA published its 13th General Report in April 2024, which contains a thematic chapter about the consequences of the war in Ukraine on the fight against human trafficking.⁹ The report highlights the heightened risks faced by unaccompanied and separated children from Ukraine who arrive in Council of Europe member States or move within the Schengen area, particularly when member States are unable to ensure the

⁹ Group of Experts on Action against Trafficking in Human Beings, [13th General Report covering the period from 1 January to 31 December 2023](#).

appointment of a guardian, provide access to education, or keep track of these children.¹⁰ GRETA will continue to monitor, including in the context of its ongoing third evaluation of Ukraine (which involved an evaluation visit in May 2024), the situation of the children of Ukraine in relation to human trafficking in order to ensure that the standards and measures contained in the Convention are effectively implemented. As such, these assessments are crucial for ensuring adherence to international standards and for improving protections for trafficked children.

“The Council of Europe Anti-trafficking Convention has been praised as a revolutionary framework for addressing human trafficking through the prism of human rights. It adopts a child sensitive approach, with specific provisions aimed at protecting child victims.

The Council of Europe Group of Experts on Action against Trafficking in Human Beings continues to monitor and support Ukraine to ensure that the Convention’s standards and measures are effectively implemented even during times of war.”

Petya Nestorova, Executive Secretary of GRETA

¹⁰ Ibid, pages 38-43.

II. Understanding the Risks

14. Despite the internationally agreed definition of human trafficking, it is difficult to develop a common understanding of what constitutes trafficking among all relevant sectors and professionals, which complicates the efforts of detecting, investigating, and prosecuting it. Many misconceptions about human trafficking lead to the offence being a hidden crime or confused with other crimes.

15. There is no standardised mechanism for collecting data on human trafficking cases involving children of Ukraine across Council of Europe member States. Moreover, there is no statistical evidence indicating an increase in identified victims of trafficking among Ukrainian children. However, it is generally acknowledged that **the absence of evidence does not equate to the evidence of absence of human trafficking**. This is not only due to a lack of data but also because different agencies or States may classify human trafficking cases differently. For example, a case of child trafficking may be categorised and prosecuted as child sexual exploitation.

“When it comes to child exploitation and human trafficking - an absence of evidence is not evidence of absence.”

Colin Carswell and Bernie Gravett, Counter Trafficking Network

16. Understanding the risks of trafficking in human beings is therefore crucial in order to prevent and combat this complex and hidden crime. In presenting the risks highlighted at the Special Hearing, this report will follow the methodology used by United Nations Office on Drugs and Crime¹¹ and IOM,¹² which classify the growing risks associated with human trafficking during armed conflicts under four main categories.

A. Risks Associated with State Collapse, Deterioration of the Rule of Law, and Impunity

17. The ongoing armed conflict in Ukraine presents significant risks for the effective protection of children from human trafficking, particularly in the **temporarily occupied territories by the Russian Federation**. In these regions, the Ukrainian authorities’ ability to protect children and address human trafficking cases is severely limited. Moreover, the restricted access for international organisations and CSOs aggravates the situation, leaving vulnerable populations, especially children, exposed to organised crime groups, including human traffickers.

18. Ukraine has comprehensive legislation for combating human trafficking, specialised entities and coordination mechanisms at national and regional level. However, the strain on these institutions due to the ongoing armed conflict raises concerns about their capacity to continue effective operations. Despite these challenges, Ukrainian authorities remain focused on combating human trafficking, leveraging years of experience to address the evolving risks.

19. Although not directly relevant to the war in Ukraine, it was noted during the Special Hearing that the **mistrust of existing protection systems, lack of resources and lack of adaptability can be considered as factors that could lead to the undermining of the rule of law and to the emergence of impunity, not only in Ukraine but also in other Council of Europe member States hosting children of**

¹¹ United Nations Office on Drugs and Crime, [Trafficking in Persons in the Context of Armed Conflict](#), 2018.

¹² International Organization for Migration, [Human Trafficking in the Ukraine Crisis, Regional Anti-Trafficking Task Force](#), March 2023.

Ukraine. For instance, where communities have little faith in child protection systems, individuals are less likely to report crimes concerning abuse and exploitation of children, including human trafficking.

1. Hostile political climate in Europe against migrants and refugees

20. The number of migrants and refugees arriving in Europe has increased significantly since 2015, resulting in the adoption of legislative and other measures to limit the number of irregular migrants and restrict access to international protection. **The hostile political environment towards migrants and refugees is also likely to affect all people and children fleeing to Europe.**

2. Systemic challenges in self-identifying as a victim and reporting

21. While **self-identification and reporting by the victim are not mandatory for the investigation and prosecution of trafficking in human beings**, due to the hidden nature of the crime, they are a very important ways to reveal the offence. In this context, **reporting refers to the act of victims or third parties providing information concerning cases of human trafficking to competent authorities.**

22. **Victims of trafficking are in a very difficult position when it comes to self-identification and reporting.** There are two commonly seen scenarios how victims of human trafficking typically come forward. First, if they realise that they find a way to escape the traffickers, then they may report, overcoming societal taboos and misconceptions about human trafficking. Second, the organised crime group has exploited them as much as they could, extracted all the money they wanted and got rid of the victim. The latter case is unfortunately more common.

23. **Self-identification is significantly more difficult when it comes to child victims because often children's only "normal" is the current state that they are living in.** It is more difficult for them to realise that they are living in an abusive and exploitative environment. Even if they do realise that their situation is abnormal, they may not know that they are victims of a crime and what crimes have been committed against them. As a result, **it is more difficult for children to come forward and report on what is happening without having child-friendly awareness-raising programmes, reporting mechanisms, and trained professionals who can spot signs of abuse and take steps to refer child victims to specialised protection and assistance services.**

24. Insufficient accessibility of reporting mechanisms is another obstacle. One reason for this is **low awareness of who, how and when to report signs of exploitation and human trafficking.** **Language barriers** further compound these issues, with children of Ukraine facing difficulties in accessing assistance and appropriate remedies in host countries. It was pointed out that even victims who try to report once end up giving up after an unsuccessful first attempt.

"Self-identification is especially challenging for child victims of human trafficking because their sense of "normal" is based on their current circumstances. They often do not recognise that their situation is abnormal or that they are being exploited."

Julia Sachenko, Save Ukraine

3. Difficulties in obtaining the official victim status

25. While obtaining official victim status (and the support and protection measures that come with it) is as difficult as prosecuting and proving the highly complex crime of trafficking in human beings, the denial of access to such measures forces victims to remain in the vulnerable position that is often the reason why they became victims in the first place. **In other words, without access to the assistance and protection that comes with the official victim status, it is possible that people in vulnerable situations may once again become targets of human traffickers.**

4. Lack of resources in the State institutions

26. The lack of human and material resources of law enforcement agencies makes proactive investigations and the identification of victims difficult. **Under-resourced police forces can only suspect offences but cannot effectively investigate, which can lead to impunity.**

27. **The understaffing and limited budget of other State agencies responsible for the coordination of the fight against human trafficking and the protection of victims also limit the support which can be provided to victims.** For example, the National Social Service of Ukraine, which plays a critical role in providing shelter and support to internally displaced persons and victims of trafficking in human beings, lacks essential staff, such as psychologists, which significantly limits its capacity to provide the necessary care and protection to the victims.

5. Lack of national referral mechanisms or deficiencies in implementation

28. National referral mechanisms¹³ play a crucial role in ensuring cross-sectoral and international co-operation and collaboration in the fight against human trafficking. **The absence of national referral mechanisms or deficiencies in their implementation can lead to lack of access to justice and support services, increased vulnerability to re-victimisation, impunity for human traffickers and loss of trust in State authorities.**

6. Lack of adaptability to new challenges arising from technological advancement

29. Traffickers have rapidly adapted to using online tools to find, control and exploit their victims. **Policy action and State interventions, however, remain slow and have not kept pace with technological advancement.** Human traffickers have been using online tools to target Ukrainian women and children. **Children of Ukraine who spend a significant amount of time online while pursuing online education or socialising exclusively through the internet due to isolation are more vulnerable.**

“Online child sexual exploitation and abuse keeps escalating worldwide, especially since Covid-19. While technology has become the single greatest facilitator of human trafficking, serving as a crucial tool for traffickers to recruit, advertise, control, and exploit their victims – which is particularly dangerous for children who spend more and more time online – policy actions and state responses have been slow and are not catching up with the speed that technology is evolving.”

*Tetiana Rudenko,
OSCE Office of Special Representative and Co-ordinator for Combating Trafficking in Human Beings*

¹³ A “National Referral Mechanism” refers to a framework for identifying and referring victims of trafficking to assistance and protection programs.

B. Risks Associated with the Displacement of People

30. The mass displacement of people due to the armed conflict in Ukraine has created additional vulnerabilities, particularly for children. While the Temporary Protection Directive (TPD) has provided effective emergency responses within the EU, **the changing nature of displacement, with complex displacement flows involving frequent movement between Ukraine and other Council of Europe member States, introduces new challenges.**

1. Children with disabilities in institutional care

31. The situation is particularly dire for children with disabilities evacuated from institutional care, as their vulnerabilities evolve in the context of displacement. The risks of trafficking are heightened for these children, who may be targeted due to their dependence on others and the **lack of robust, mid-long-term protective measures in new environments.**

2. Unaccompanied and separated children

32. Unaccompanied and separated children face significant risks during displacement. Cases of persons claiming to be relatives or guardians transporting children across borders have emerged, raising concerns about children's safety. In some cases, children travelling with adults who were not their parents or legal guardians were allowed to move with the accompanying adult without proper verification, increasing the possibility of trafficking. **The lack of coordinated cross-border registration and identification systems further increases these risks**, as it makes it difficult to verify the identity and intentions of accompanying adults. **The lack of rapid information exchange mechanisms** between countries leaves children vulnerable to trafficking networks that exploit these gaps.

3. Relocation of children

33. Criminal networks which have existed before the full-scale invasion of Ukraine and have long targeted Ukrainian nationals, have adapted to exploit the current crisis, with some groups posing as humanitarian organisations to gain access to vulnerable children. A notable case reported at the hearing involved a criminal group requesting the relocation of hundreds of children of Ukraine from one host State to another under the guise of being part of the United Nations system. This incident highlights the sophisticated methods traffickers use to exploit **institutional weaknesses and the critical need for vigilant monitoring of relocation processes.**

“Organised crime networks generate immense profits from human trafficking, particularly through the sexual exploitation of children. To facilitate their operations, they often disguise themselves as legitimate entities — from well-known businesses and religious or humanitarian organisations to international institutions. This strategy enables them to operate discreetly, build trust, and maintain impunity. To protect victims and prevent future violations, it is crucial to raise awareness among all relevant stakeholders about the indicators and methods of operation of such networks.”

Silvia Tăbușcă, Human Rights Law Professor

4. Missing children

34. **Children of Ukraine migrating abroad , especially those without parents or families, face heightened risks as they move between countries.** Additionally, reports of mothers migrating with their children and returning to Ukraine without them raise significant concerns about the safety and whereabouts of these children. The Ukrainian authorities often lack information about these children, increasing the risk of harm to these children, including of human trafficking.

35. In order to prevent children from going missing and to reduce their vulnerability to human trafficking, it is crucial to establish clear procedures for the rapid exchange of information between member States, including registration of children, their movement between transit and destination countries, as well as their places of residence. However, such mechanisms for the exchange of information on children on the move have yet to be established and member States report difficulties in monitoring children of Ukraine, especially when they move within the Schengen area.

36. The only available mechanism for EU member States, the Schengen Information System, is only activated once a child has been reported missing to national law enforcement authorities, which usually takes weeks. By then the child may have already reached to the final destination and cannot be traced, as the Schengen Information System can only identify persons while they are crossing a border and the child will have stopped crossing borders, at least for a certain period of time.

5. New wave of migration of 16-18 years old boys

37. Recently, there has been a significant **increase in the number of 16–18 year-old boys from Ukraine migrating to Council of Europe member States for fear of military recruitment.** Their increased vulnerabilities (they are afraid to report or seek help when faced with risks due to their desire to evade State authorities), leads to them becoming targets of human traffickers.

38. There has also been an **increase in the number of children in this group dropping out of school and vocational training,** leaving them vulnerable to longer-term vulnerabilities relevant to human trafficking, such as social isolation, lack of access to psychosocial services, lack of access to higher education and future employment opportunities.

"We are witnessing a mass migration of adolescent boys driven by fear of military recruitment. Human traffickers are exploiting this trend and targeting these boys, who are particularly vulnerable due to their reluctance to report abuse out of fear of authorities."

Natalka Kryva, Caritas Ukraine

"Higher numbers of boys from Ukraine are dropping out of education or vocational training early, either to avoid military recruitment or to support their families financially."

Alyona Samar, Missing Children Europe

C. Risks Associated with Humanitarian Need and Socio-economic Stress

39. The conflict in Ukraine has led to widespread humanitarian need and socio-economic stress, both of which significantly increase the risks of exploitation, including human trafficking. **Inadequate economic resources are a significant issue, and the vulnerability of children of Ukraine remains high, exacerbated by factors such as limited access to education and healthcare.**

1. Conditions in shelters

40. Conditions in shelters and collective centres for migrants and refugees, both in Ukraine and in host countries, where the most vulnerable people and children are located, exacerbate the risk of trafficking, especially when their **socio-economic needs are not met by long-term support and protection measures**. Traffickers use different methods to recruit victims, such as placing false advertisements in the surroundings of shelters about job, visa, and transport opportunities abroad.

2. Decline in humanitarian assistance over time

41. While host States have dedicated significant resources to assist children of Ukraine, including temporary accommodation, schooling, language classes, and medical and psychological care, challenges remain. Some services are being reduced or discontinued as the war continues with no end in sight. **Ukrainian children and their caregivers are increasingly struggling to meet their basic needs as humanitarian aid and their savings diminish.** The reduction of social protection programmes in host countries exacerbates vulnerabilities to many forms of abuse, including human trafficking.

42. **Child labour and forced begging are also serious concerns.** There has been a **rise in unaccompanied adolescent children of Ukraine, some as young as 14-15 years old, migrating between Ukraine and other Council of Europe member States to find work** to support themselves and their families. While most Council of Europe member States have mandatory education until the age of 18, some of these children, having already graduated in Ukraine by the age 16-17, are unwilling to continue schooling in the host States. **Many live with their employers and work without valid work contracts**, raising concerns about their safety and well-being. The lack of job security and poor living conditions make them vulnerable to exploitation and human trafficking.

3. Conditional access to humanitarian aid

43. In some Council of Europe member States, **the earnings of parents/caregivers of children of Ukraine are deducted from the humanitarian and social support they receive.** This deduction may inadvertently attract the so-called grey economy.¹⁴ For example, a single mother with young children who wants to work may prefer to take up work in the grey economy, such as domestic work, where the lack of contractual obligations creates risks of exploitation.

¹⁴ The term “grey economy” here refers to the informal sector, which is defined on a country specific basis as the set of businesses produce goods or services for the market but are not registered under national regulations, such as those related to taxation, social security obligations, or other regulatory requirements ([OECD Glossary of Statistical Terms: Informal Sector](#), OECD Publishing, Paris, 2008).

D. Risks Associated with Social Fragmentation and Family Breakdown

44. The ongoing armed conflict in Ukraine has led to significant social fragmentation and family breakdowns, conditions that significantly increases the risk of human trafficking. **The war has resulted in family separations, leaving children without the protective oversight of parents and other trusted adults.** This fragmentation increases their vulnerability to traffickers who exploit their isolation and lack of support.

1. Online education

45. The risk of human trafficking is further increased by the online education of children of Ukraine, which has been going on for more than 2 years. **This leaves many children unsupervised and alone at home.** Children are not only at risk of being exposed to online exploitation and grooming, but are also at increased risk of becoming targets of human traffickers. The situation is amplified by the **lack of access to psychosocial support services and missed opportunities for social interaction with peers,** leaving children of Ukraine more vulnerable.

2. Social isolation and discrimination

46. Unaccompanied and separated children of Ukraine often face significant social isolation, as their primary focus is on returning home and resuming normal life in Ukraine, rather than integrating into their new environment. This **isolation, combined with the lack of social support networks built through personal relationships, increases their vulnerability to human trafficking.** Additionally, individuals, including **children of Ukraine, who have experienced or reported discrimination, appear to be among the most susceptible to human trafficking.**

"Specific factors such as age, marital status, and experiences of discrimination are associated with an increased risk of trafficking. We found that the vulnerability of individuals affected by the war in Ukraine remains high due to challenges, including limited access to healthcare and financial support, exposure to unfair or exploitative working conditions, discrimination, and barriers to social and protective services due to language difficulties."

Heather Komenda, International Organization for Migration

III. Mitigating the Risks: Transversal Approaches

47. Reducing the risk of human trafficking for children of Ukraine requires **robust cooperation and collaboration among all stakeholders**. Effective collaboration depends **on clear communication, shared objectives, and coordinated action plans**. This chapter outlines strategies to mitigate these risks, emphasising the critical roles of various stakeholders, including law enforcement, local and regional authorities, international organisations, and CSOs.

“Since the start of martial law, the risk of human trafficking has significantly increased due to the forced migration of Ukrainian population within Europe and internally. Displaced individuals face employment and survival challenges, increasing their vulnerability to become victims of crimes, particularly for children. To address this, we need a unified policy on combating human trafficking, emphasising cooperation and protection of human rights at both central and local levels, in partnership with law enforcement, civil society and international organisations.”

Vasyl Lutsyk, Head of the National Social Service of Ukraine

A. Governmental Authorities and Law Enforcement

48. Continuous innovation in methods, tools, laws, and policies is necessary to stay ahead of human traffickers, who are constantly developing new tactics. For instance, to prevent the abuse of internet to recruit and exploit victims, cooperation with Internet service providers is essential. **Despite some progress, more regulation in this field and more interaction with the private sector** is needed. States should require tech companies to report suspicious announcements and activities and hold them criminally liable for knowingly facilitating or supporting human trafficking. Efforts should include involving children as experts of their lived experience to guide and enhance policies to test whether existing systems work in practice and to learn from them as strengthening or developing **child-friendly, multidisciplinary, and multisectoral approaches**.

49. Enhancing the **accessibility of hotlines and reporting mechanisms** for children of Ukraine is vital, ensuring they have the means to seek help when needed. At the very least, this entails that children of Ukraine are able to report in their mother tongue if they feel at risk and, better still, that these services are provided by people with the capacity to provide child-friendly support.

Good practice example:

In 32 countries across Europe, Missing Children Europe coordinates the [116 000 hotline resources](#) providing a free and 24/7 service to children at risk of going missing. Anyone affected by a case of child disappearance can receive immediate emotional, psychological, social, legal, and administrative support. The service is provided in Ukrainian language and run by the NGO Magnolia. There are also variety of different text-based communication platforms, such as a chat service (through [Facebook Messenger](#) for children of Ukraine).

50. It is essential to **establish or allocate sufficient human and financial resources to the state agencies responsible for coordinating the fight against human trafficking**. This will ensure that **support and protection are provided to presumed victims**, so that individuals at risk do not remain in vulnerable situations, even when there is insufficient evidence to grant them official victim status.

51. To effectively combat human trafficking, law enforcement agencies across member states must **conduct proactive investigations** that extend beyond traditional reactive measures. It is crucial for law enforcement not to wait for victims to come forward but to actively identify potential victims and offenders, paying particular attention to specific risk factors related to people living in vulnerable situations, such as children of Ukraine.

52. Prioritising the **training of law enforcement** officers is essential to increase proactive and effective investigations. These trainings should also be extended to all relevant sectors, such as transportation, where employees may encounter potential victims and offenders of human trafficking. **Joint trainings between different sectors and State agencies** also strengthen the necessary cooperation and collaboration.

53. The **creation and improvement of national referral mechanisms** across all Council of Europe member States are crucial. These mechanisms should also foster effective cross-border cooperation between member States. With the displacement of children from Ukraine across Europe, such cooperation is especially critical. The **establishment of specialised national crime agencies or specialised departments within the police force**, equipped with adequate human and financial resources, is also essential. Such agencies lead proactive investigations against organised crime networks involved in trafficking, enabling thorough investigations rather than merely suspecting or observing criminal activities. **Joint investigation teams**, supported by international organisations, such as Europol and EUROJUST, are fundamental to the fight against organised crime, including trafficking. **Strengthening collaboration between Ukrainian authorities** (National Social Service of Ukraine is the central authority in charge of implementation of the state policy on human trafficking), **diplomatic missions and the competent authorities of Council of Europe member States** is also vital to address key issues concerning cross-border protection of children of Ukraine.

Good practice example:

Ukraine participates actively in cross-border cooperation at the level of law enforcement. The primary framework for this cooperation is [EMPACT](#), a European platform coordinated by [Europol](#), which includes participation from member states, third countries, and EU agencies. In 2024, there are 24 operational actions under EMPACT targeting trafficking, with Ukraine participating in 19 of them, demonstrating its significant engagement. Ukraine also has representatives and prosecutors at [EUROJUST](#) and is involved in three joint investigation teams. Moreover, in March 2024, Europol, together with 11 member states, established a special operational task force dedicated to investigating the sexual exploitation of Ukrainians within the EU.

54. Furthermore, **enhanced monitoring of relocation processes and rapid communication mechanisms** should be developed to ensure that children of Ukraine do not go missing or face the risk of trafficking when relocating between Ukraine and Council of Europe member States, in particular within the Schengen area.

B. Local and Regional Authorities

55. Local and regional authorities are at the forefront of protecting children of Ukraine from trafficking. These authorities should play a part in **ensuring that all unaccompanied and separated children, including children with disabilities in institutional care, are promptly registered and provided with protection and care**. Inter-agency and international cooperation and collaboration should be achieved in the **appointment, vetting, supervision, and support of guardians of children of Ukraine**.

Good practice example:

Greece has established a reception response to ensure that children of Ukraine arriving on its territory are duly registered and have access to support and protection. In cooperation with law enforcement agencies, every child of Ukraine and every accompanying adult are registered in the system, regardless of their relationship and legal status. A team of child protection experts, in collaboration with specialised CSOs, has been set up to conduct an on-site best interests assessment upon entry into the country, in a child-friendly environment, in separate consultations with the child and accompanying adult to decide on the child's care arrangements. The system works effectively as it makes children visible from the moment they enter the country.

56. As the emergency humanitarian support gradually decreases, local and regional authorities become crucial in continuously **monitoring the situation to ensure that children and their parents, guardians, or caregivers have access to essential social support services** such as healthcare, psychological support, education, and legal assistance. Moreover, it is important to **develop sustainable mid- and long-term protection measures and care arrangements**, in collaboration with governmental authorities, CSOs, and international organisations, to support children in institutional care and shelters.

57. Local and regional authorities can also play a crucial role in the **organisation of public awareness-raising campaigns** and the **creation of online and offline child-friendly materials to inform children about the risks of trafficking**. Raising awareness is a key component of combating human trafficking. Such campaigns should target not only potential victims but also teachers, healthcare professionals, frontline officials, and the general public. These campaigns should provide guidance on how to identify, report, and protect people in vulnerable situations, including children of Ukraine. Misconceptions surrounding victims of human trafficking must also be addressed. **Promoting the importance of in-school education and access to community-based psychosocial support** for children of Ukraine to children themselves, their caregivers, legal guardians, parents and families is another key risk reduction method.

C. International Organisations

58. Recommendations and guidelines from international organisations provide a unified framework for State and non-State actors in preventing human trafficking. These guidelines emphasise, among other things, the importance of registering all unaccompanied children, providing them with protection and care, and creating child-friendly materials to help them identify and prevent the risks of human trafficking.

59. **International organisations also support member States and CSOs in designing and delivering capacity-building and training activities**, ensuring that all relevant stakeholders are adequately equipped to handle trafficking cases effectively.

Good practice example:

The [Organization for Security and Cooperation in Europe \(OSCE\)](#) has conducted 17 workshops in 10 countries on unconditional access to services for victims of trafficking in human beings in line with "[Putting victims first: The social path to identification and assistance](#)" framework. The workshops are followed by tailored support to States to introduce respective legislative amendments and capacity building activities concerning first line responders to identify child victims of trafficking and

provide such children with protection, as well as with appropriate assistance, effective remedies, and other services.

The [International Organization for Migration \(IOM\)](#) and OSCE co-sponsored simulation-based training on human trafficking in Ukraine that brought together social workers, child protection specialists, and law enforcement officers from different regions of Ukraine, including regions occupied by the Russian Federation.

D. Civil Society Organisations

60. **CSOs are vital in reaching vulnerable populations and providing on-the-ground support.** CSOs lead grassroots awareness-raising campaigns, offering education and support services directly to at-risk Ukrainian children and their families. They also play a crucial role in identifying potential victims and providing trauma-informed care and support services, regardless of the victim's readiness to report the crime.

61. CSOs contribute to **refining anti-trafficking strategies and ensuring that the voices of victims and children are considered in policymaking.** They also play an important role in **identifying new trends and contribute to developing targeted prevention measures**, particularly for new vulnerable groups, such as boys aged 16-18 who may be at risk of dropping out of school due to fears of military recruitment, fleeing Ukraine, and hiding from state authorities.

Good Practice Examples:

Over the past 12 months, [Caritas Ukraine](#) has provided assistance to 128 survivors of human trafficking. They also conduct at least one preventive and awareness-raising event each month, reaching over 1,000 participants annually.

[Kids in Need of Defense \(KIND\)](#) is working on a new project called "Suzir'ya" ("Constellation") that focuses on preventing and improving responses to child trafficking and exploitation. The project provides legal assistance to child victims and witnesses of war crimes and supports accountability and investigative efforts related to conflict-associated crimes against children displaced from Ukraine to Slovakia, Poland, Czechia, and Romania.

[Save Ukraine](#), in collaboration with law enforcement and the Prosecutor's Office, works on the identification of victims of human trafficking. Since the war began, they have provided comprehensive support through a team of psychologists and lawyers to 71 child survivors of sexual abuse and human trafficking, leading to three convictions. They offer safe shelter and rehabilitation for three to six months at no cost to the children and if they are accompanied by their parents, the family stays together.

Conclusion and Summary of Main Recommendations

62. Despite various emergency measures and the time that has passed since the start of the war, children of Ukraine remain at significant risk of human trafficking, as their vulnerabilities have not disappeared, despite changing form. Awareness of these risks is the first crucial step in protecting them from human trafficking.

- *Governmental authorities, local and regional authorities, international organisations, and CSOs should work together to increase awareness of all relevant stakeholders of the risks of human trafficking to protect children of Ukraine.*

63. Eliminating the risks of human trafficking requires a coordinated and multifaceted approach.

- *Governmental authorities are encouraged to ensure collaboration with and between law enforcement agencies, local and regional authorities, CSOs, the private sector, and international organisations.*
- *National referral mechanisms and international cooperation mechanisms should be established/strengthened to ensure effective collaboration among all relevant stakeholders.*
- *Adequate resources should be dedicated to awareness-raising, cooperation, prevention, and proactive investigation initiatives.*

64. Innovation is also vital, as traffickers continually develop new methods to exploit victims. Online trafficking and abuse are prime examples of emerging and alarming threats increasingly carried out through digital platforms.

- *It is imperative to refine strategies, invest in multidisciplinary and multisectoral collaboration, strengthening law enforcement agencies, and enhance cooperation with the private sector to effectively address new challenges.*

65. Only through cooperation, innovation, and continuous vigilance can the risks of trafficking be effectively mitigated, ensuring the protection and well-being of all children of Ukraine in Europe.

Resources Shared during the Special Hearing

Council of Europe Group of Experts on Action against Trafficking in Human Beings (GRETA), [Guidance Note on addressing the risks of trafficking in human beings related to the war in Ukraine and the ensuing humanitarian crisis](#), May 2022.

European Commission, [Migration management: Welcoming refugees from Ukraine](#).

European Union Agency for Criminal Justice Cooperation, [Trafficking in human beings](#).

Europol, [Early Warning Notification - War in Ukraine: refugees arriving to the EU from Ukraine at risk of exploitation as part of THB](#).

International Organization for Migration, [Human Trafficking in the Ukraine Crisis, Regional Anti-Trafficking Task Force, March 2023](#).

International Organization for Migration, [Human Trafficking in the Ukraine Crisis - Regional Anti-Trafficking Task Force](#), March 2023.

International Organization for Migration, [Human Trafficking in the Ukraine Crisis, Regional Anti-Trafficking Task Force](#), March 2023.

International Organization for Migration, [Ukraine Internal Displacement Report: General Population Survey. Round 12: 23 January 2023](#).

International Organization for Migration, [Vulnerability to Trafficking in Persons and Labour Exploitation in Ukraine, Displacement Tracking Matrix](#), June 2024.

Organisation for Security and Cooperation in Europe, [Addressing trafficking in human beings related to the humanitarian crisis stemming from the war against Ukraine - Code of conduct for first line responders](#), March 2024.

Organisation for Security and Cooperation in Europe, [Child Trafficking and Child Protection: Ensuring that Child Protection Mechanisms Protect the Rights and Meet the Needs of Child Victims of Human Trafficking](#), December 2018.

Organisation for Security and Cooperation in Europe, [Establishing National Focal Points to Protect Child Victims of Trafficking in Human Beings](#), December 2020.

Organisation for Security and Cooperation in Europe, [Identification of trafficking in human beings related to the humanitarian crisis stemming from the war against Ukraine - Brief for first line responders](#), January 2024. Organisation for Security and Cooperation in Europe, [Putting victims first: The 'social path' to identification and assistance](#), March 2023.

UN Committee on the Rights of the Child, [UN experts call for urgent action to protect Ukrainian children with disabilities in residential care institutions](#), October 2022.

United Nations Office on Drugs and Crime, [Trafficking in Persons in the Context of Armed Conflict](#), 2018.

United Nations Refugee Agency, [Ukraine emergency](#), January 2023.

Consultation Group on the Children of Ukraine (CGU)

SPECIAL THEMATIC HEARING: understanding the risks of trafficking of children of Ukraine for the purposes of sexual exploitation and labour exploitation

2 July 2024

Hybrid Format (in Strasbourg Meeting Room 11, Palais, Council of Europe and via Zoom, Link: <https://coe-int.zoom.us/j/62945252595?pwd=rUPaTlpVrN6fKM4VT2Urana2EE4Pn0.1>, Meeting ID: 629 4525 2595 / Password: 721963)

Draft Agenda

SPECIAL THEMATIC HEARING: understanding the risks of trafficking of children of Ukraine for the purposes of sexual and labour exploitation

Moderation: Benoit van Keirsbilck, UN Committee on the Rights of the Child, CGU member

✚ Opening of the hearing (9:00-9:15)

- Petya Nestorova, Executive Secretary of GRETA
- Benoit van Keirsbilck, UN Committee on the Rights of the Child, CGU member

✚ The experience of Ukraine and neighbouring member States dealing with the phenomenon of THB (9:15-10:15)

➤ Legal and policy perspectives

- Vasyl Lutsyk, Head of the National Social Service of Ukraine
- Iryna Suslova, Representative of the Parliamentary Commissioner for Child Rights, Ombudsman of Ukraine
- Silvia Tăbușcă, Human Rights Law Professor, Romanian- American University, Director of the Center for Human Rights and Migration and Coordinator of REACT Initiative (Research Excellence against Child Trafficking)

➤ Law enforcement perspectives

- Colin Carswell and Bernie Gravett, Counter Trafficking Network, Directors, Council of Europe Experts

✚ The perspective of international standards and the work of the international organisations (10:15-11:00)

- Petya Nestorova, Executive Secretary of GRETA
- Zsuzsanna Felkai-Janssen, Team Leader in the Office of the EU Anti-trafficking Coordinator
- Heather Komenda, Senior Regional Thematic Specialist for Migrant protection covering South-Eastern Europe, Eastern Europe and Central Asia, International Organization for Migration (IOM)
- Tetiana Rudenko, Senior Co-ordination Adviser, OSCE Office of Special Representative and Co-ordinator for Combating Trafficking in Human Beings

SPECIAL THEMATIC HEARING CONT'D via ZOOM (same details as above):

✚ *The role of Civil society in combating trafficking of children (11:15-12:00)*

➤ *Civil society perspectives*

- *Natalka Kryva, Head of Social Programme Department, Caritas Ukraine*
- *Julia Sachenko, Director of Child Protection and Anti-Trafficking, Save Ukraine*
- *Alyona Samar, Project Officer, Missing Children Europe*
- *Branko Kišš, Project Manager with extensive experience combating organized crime, Kids in Need of Defense (KIND)*

✚ *Discussion (12:00-12:50)*



Some possible questions to guide the discussion:

- Is there reliable data available to your authorities/other relevant national actors (i.e., civil society) on trafficking of Ukrainian children in your countries?
- Has the situation related to the trafficking of children within Ukraine and in neighbouring states / your respective countries changed since February 2022?
- What is the reporting procedure and which entity is responsible for granting the status of a victim of trafficking in your country?
- What mechanisms are in place in your country to prevent and combat trafficking of Ukrainian children (screening of potential victims, etc.)?
- How does your country address risk factors with regard to the protection of children of Ukraine against trafficking? (ex. asylum centres and other precarious residential or informal labour situations, exclusive reliance on online education, etc.)
- What do you consider the greatest challenges in combating trafficking of children in your member States?
- What do you consider promising practices from your national contexts?
- Are there good practices of intergovernmental cooperation (bilateral or multilateral) to prevent, investigate and prosecute the cases of THB?

✚ *Closing of the hearing: reflections on the main findings (12:50-13:00)*

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