

Vulnerability and resilience to exploitation and trafficking among people fleeing Ukraine

In Berlin, Bern and Warsaw

MMC Research Report,
August 2024



Front cover photo credit:

© IOM/Muse Mohammed 2022.

The Michalovce hotspot includes an IOM tent where IOM provides essential information, DTM, toys for children, and information advising refugees and TCNs on the potential risks of trafficking that can occur for those planning to take further transportation to other neighboring countries.

Acknowledgements

Written by: Julia Litzkow (MMC)

Researched by: Julia Litzkow (MMC), Maxime Giraudet (MMC)

Data visualization and analysis: Anaïs Momoli (MMC)

Reviewed by: Roberto Forin (MMC), Jennifer Vallentine (MMC), Claire Healy (UNODC), Giulia Serio (UNODC), Chris Chinda (UNODC)

Layout and design: Simon Pegler

Special thanks to:

- Ukraine Schweiz Bern, IPSOS, POMA and their enumerators who collected quantitative data for this project in Bern, Berlin and Warsaw;
- All translators and cultural mediators for their invaluable assistance;
- All key informants who took time to share their insights;
- All people who fled the war in Ukraine and shared their stories with us

Suggested citation: Mixed Migration Centre (2024). *Vulnerability and Resilience to Exploitation and trafficking among people fleeing Ukraine in Berlin, Bern and Warsaw*. Available at: [mixedmigration.org](https://www.mixedmigration.org)

The information and views set out in this report are those of the authors and the MMC and do not necessarily reflect the official opinion of the Danish Refugee Council (DRC), implementing research partners, or any of the donors supporting the work of MMC or this report. Responsibility for the content of this report lies entirely with the MMC.

About MMC

MMC is a global network engaged in data collection, research, analysis, and policy and programmatic development on mixed migration, with regional hubs in Africa, Asia and the Pacific, Europe and Latin America, and a global team based across Copenhagen, Geneva and Brussels.

MMC is a leading source for independent and high-quality data, research, analysis and expertise. MMC aims to increase understanding of mixed migration, to positively impact global and regional migration policies, to inform evidence-based mixed migration responses for people on the move and to stimulate forward thinking in public and policy debates on mixed migration. MMC's overarching focus is on human rights and protection for all people on the move.

MMC is part of the Danish Refugee Council (DRC). While its institutional link to DRC ensures MMC's work is grounded in operational reality, it acts as an independent source of data, research, analysis and policy development on mixed migration for policy makers, practitioners, journalists, and the broader humanitarian sector.

For more information visit: www.mixedmigration.org and follow us at: [@Mixed_Migration](https://twitter.com/Mixed_Migration)

About this report

This report is part of the "Rapid Actionable Assessment of Human Trafficking and Migrant Smuggling in the context of the Ukrainian War" implemented by the [United Nations Office on Drugs and Crime \(UNODC\)](https://www.unodc.org/) in partnership with MMC, and funded by the Swiss Federal Department of Foreign Affairs (FDFA), the Danish International Development Agency (DANIDA), and the British Foreign, Commonwealth and Development Office (FCDO).

The project aims at better understanding the risks and incidence of trafficking in persons and smuggling of migrants in the context of the journeys of both Ukrainians and non-Ukrainians fleeing Ukraine. The assessment was conducted between September 2022 and May 2024 and covers the cities of Bern, Berlin and Warsaw.

Research across the three locations has been conducted using the same methodology and tools to ensure full standardization between datasets, allowing for potential consolidation and comparability across cities.

Based on the analysis of the quantitative and qualitative data collected this report examines factors of vulnerability and resilience to exploitation and trafficking of people who fled Ukraine. Building on the same quantitative and qualitative data UNODC will publish a complementary study in late 2024, on the the scale and composition of displacement from Ukraine, incidence and indications of smuggling of migrants and of different forms of trafficking in persons, legal and policy measures. The study also includes in-depth case studies of individual refugees' experiences. UNODC (forthcoming, 2024). *Study on trafficking in persons and smuggling of migrants in the context of displacement caused by the war in Ukraine*. Vienna: UNODC.

Three briefing papers exploring the project's data on the journeys, living conditions, livelihoods, and future intentions of people from Ukraine in Bern, Berlin and Warsaw have been published in June 2023 and are available here:

[Displaced from Ukraine to Bern](#)

[Displaced from Ukraine to Berlin](#)

[Displaced from Ukraine to Warsaw](#)



Contents

Acknowledgements	3
1. Summary and key findings	5
2. Introduction	7
3. Methodology	9
4. General findings on risks of exploitation and trafficking	13
5. Factors of vulnerability and resilience to exploitation and trafficking	14
5.1 Vulnerability factors	15
5.2 Resilience factors	35
6. Recommendations	40
7. Conclusion	42
Annex 1. List of key informant interviews	43

Tables and figures

Figure 1.	Intersection of vulnerability factors that increase risk of TIP, adapted from ICAT Issue Brief 12	15
Figure 2.	What are your most pressing needs at the moment?	19
Figure 3.	Does your household's current financial situation cover all the household's needs?	20
Figure 4.	Since coming here, what would you consider to be the three main challenges to accessing a decent job or running a business?	21
Figure 5.	What kind of sector were you earning money in vs. what kind of sector are you making money in	23
Figure 6.	When you need support, who do you turn to?	36
Figure 7.	Did you pay anyone to provide transportation or documents to cross the border illegally during your journey?	37

1. Summary and key findings

This study examines factors of resilience and vulnerability to exploitation and trafficking of people who fled Ukraine to Berlin, Bern and Warsaw after Russia's full-scale invasion in February 2022. Conducted in partnership with the [United Nations Office on Drugs and Crime \(UNODC\)](#) it is based on desk research, quantitative data from 1,602 surveys collected with displaced Ukrainians and non-Ukrainians in 2023 and qualitative data from 57 key informant interviews (KII) conducted between 2023 and 2024. It also includes 8 illustrative case studies.

In the research conducted across three cities, instances of potential forced labour and labour trafficking were reported at relatively low levels by survey respondents.¹ Specifically, 6% of respondents (104/1,602) noted experiencing some form of workplace abuse, while 2% of respondents (35 out of 1,602) either themselves experienced or observed others who fled Ukraine facing workplace conditions that could suggest potential trafficking for forced labour. The majority of these accounts were based on observations rather than personal experience. Common issues reported included unpaid or underpaid wages, misleading information about the nature of the job, excessively long working hours, unsafe working environments, and deception about their employer's identity. While key informants corroborated the low occurrence of potential forced labour and trafficking, they also emphasized widespread violations of labour laws. A smaller proportion of survey respondents (2.5%) reported witnessing or learning about displaced Ukrainians engaged in prostitution or sex work. Of these, seven individuals believed the prostitution was forced, reflecting a 0.4% prevalence of forced prostitution, potentially signalling trafficking for sexual exploitation. None of the 1,602 respondents indicated experiencing sexual exploitation in prostitution themselves.

The relatively low incidence of potential forced labour, labour trafficking and sexual exploitation reported by survey respondents and key informants among people who fled the war in Ukraine may be attributed to the visa-free travel, temporary protection status, and robust anti-trafficking measures implemented in destination countries. However, it may also be due to cases that have yet to be identified. It is important to recognize that despite the presence of temporary protection, visa-free travel and the anti-trafficking response implemented, there are specific situations where personal, situational, and contextual factors intersect to create potential increased risk of exploitation and trafficking for individuals fleeing Ukraine.

The following is a summary of key findings on factors of resilience and vulnerability to exploitation and trafficking in the cities examined under this study, which aim to contribute to a better understanding of the experiences of people who fled the war in Ukraine and offer insights for designing interventions by United Nations (UN) organizations, Non-Governmental Organizations (NGOs), and national authorities.

Factors of vulnerability to exploitation and trafficking

- **Financial pressure:** Economic hardships and the need to support oneself and family members can increase the urgency for people displaced from Ukraine to find work quickly and can lead them to accept precarious working conditions. When asked whether their financial situation meets their household needs, 44% of respondents in Berlin, 44% of respondents in Bern and 43% of respondents in Warsaw said they were only partially covered.
- **Limited access to decent work:** Barriers like language skills, non-recognition of qualifications, and financial hardships can push refugees into low-skilled, often exploitative jobs. Lack of skills in the local language was mentioned as the top barrier to accessing a decent job, cited by 86% of respondents in Berlin, 80% of respondents in Bern and 67% of respondents in Warsaw.
- **Difficulties accessing information about the law and their rights:** Lack of knowledge about local labour laws and rights, exacerbated by lack of knowledge of the local language can increase vulnerability and make it difficult for people who fled the war in Ukraine to protect themselves from exploitative situations.
- **Insecure housing:** Dependence on employer-provided accommodation, dependence on and limited monitoring of

1 Data on trafficking in persons analysed in the UNODC study (forthcoming, 2024) shows that during 2022, the first year of the large-scale displacement from Ukraine, there was a marginal increase in the number of Ukrainians identified as trafficked in European countries. In section 5 of this report we provide a brief overview of these findings to better contextualize the subsequent discussion on factors of vulnerability and resilience

private accommodation providers and in collective centres can increase exploitation risks.

- **Challenges accessing temporary protection status:** Bureaucratic hurdles and legal status challenges particularly affect non-Ukrainian Third Country Nationals (TCNs) and Ukrainian citizens of Roma ethnicity, making them potentially more vulnerable to exploitation and trafficking in informal work arrangements.
- **Decreasing solidarity:** Growing negative perceptions of Ukrainians within host communities can lead to increased risks of exploitation as refugees feel less supported and more isolated.

Factors of resilience to exploitation and trafficking

- **Visa-free travel and temporary protection status²:** Rapid access to legal status, combined with access to social security, significantly protects against exploitation and trafficking. The EU's visa -free travel approach for Ukrainian citizens and temporary protection status enable refugees to travel legally and rapidly access work and social benefits, reducing their dependence on potentially exploitative coping mechanisms.
- **Social support networks:** Social networks within the Ukrainian community can serve as a crucial factor of resilience. These networks provide familiarity and support, helping refugees navigate employment and housing options.
- **Political will and solidarity:** Initial strong political commitment and societal support for Ukrainian refugees enhanced their resilience. Quick legislative and administrative responses and comprehensive support systems have positively impacted the integration and protection of refugees who fled the war in Ukraine. However, political will and the level of support can vary based on perceived nationality or ethnicity of people who fled the war in Ukraine.
- **Anti-trafficking responses:** Large-scale anti-trafficking measures, particularly efforts to raise awareness, were adopted by national and local authorities, as well as civil society organizations, likely building resilience against exploitation.

"People who have fled the war in Ukraine have had traumatic experiences. They have difficult and uncertain prospects for the future and do not know whether they will return, when they will return and how long they will be able to stay. They don't speak the [German] language and they don't know their rights. Loss and trauma are all major factors that naturally increase the vulnerability of people from Ukraine. Compared to the general population, fleeing from Ukraine is a huge risk factor. Only in comparison to other people who are refugees can they be less vulnerable in certain respects."³

Key Informant, Fachstelle Frauenhandel und Frauenmigration, Bern, March 2024

² Switzerland is not bound by the EU Temporary Protection Directive. However, Switzerland is granting temporary protection to refugees from Ukraine. They do not have to go through an asylum procedure, but are granted protection status S in a fast-track procedure.

³ Key Informant Interview, 2CH-K-07.

2. Introduction

Following Russia's full-scale invasion of Ukraine on 24 February 2022, millions of people were forced to leave their homes in Ukraine and seek refuge within Ukraine or in neighbouring countries across Europe and beyond. Within the first week of the conflict, over 874,000 people left Ukraine in search of safety and security.⁴ As of 13 June 2024, 5.9 million refugees from Ukraine are registered across Europe, constituting a significant portion of the 6.4 million Ukrainian refugees registered globally.⁵ More than 1.1 million are registered in Germany, 957,000 in Poland and 66,000 in Switzerland.⁶

In situations of conflict, vulnerability to trafficking in persons (TiP) and exploitation arises from the conflict itself, due to a lack of opportunities for income generation, interruption in the provision of essential services, and education, lack of rule of law, and the risk of exploitation in armed combat.⁷ Further, as people are displaced internally or across borders, they may be more vulnerable to traffickers, who subject them to exploitative conditions upon arrival or during their journey.⁸ Displaced people, often traumatized and disoriented by the conflict, may face economic hardships, and lack access to reliable information and resources, making them more susceptible to false promises of job prospects, safety and assistance. Moreover, the breakdown of social structures and support networks may leave individuals isolated and without the protection of their communities, increasing their vulnerability to exploitation.

Risks of trafficking and exploitation in the context of the war in Ukraine should also be understood from a historical perspective. Already before Russia's full-scale invasion, criminal networks in Ukraine were reportedly involved in human trafficking.⁹ Further, analysis indicates a link between the displacement of individuals from Ukraine in 2014 and 2015 due to the conflict in the Eastern region and an increase in the detection of trafficking in persons (TIP) from Ukraine to Western and Central Europe in subsequent years.¹⁰

After Russia's full-scale invasion of Ukraine, the activation of the 2001 European Union (EU) Temporary Protection Directive (TPD) in March 2022 simplified the refugee registration process across EU countries for Ukrainians fleeing the conflict, granting them access to a temporary residence permit and an array of rights including access to the labour market, social security, healthcare, and education.¹¹ The directive has been extended until March 2025.¹² Legal channels for entry and legal status are important factors for bolstering resilience against trafficking and exploitation. In addition, the activation of the TPD largely prevented the need for migrant smuggling.¹³

However, Ukrainians without ID documents, Ukrainians who are not registered in countries of destination, and non-Ukrainians fleeing Ukraine, as well as men forbidden from leaving the country under martial law remain particularly vulnerable to trafficking and exploitation. Visa-free entry and temporary protection status are not conferred to non-Ukrainian, non-EU citizens who were residing in Ukraine at the outbreak of the war (with some exceptions), further Ukrainian men aged 18-60 are barred from leaving the country under martial law, therefore these groups may rely on migrant smuggling services to travel irregularly, increasing their vulnerability to trafficking and exploitation.¹⁴

Against this background, shortly after the outbreak of the war, numerous United Nations (UN) agencies, the EU, and Civil Society Organizations (CSOs), as well as the media, among others, issued warnings about the increased risk of human trafficking and exploitation from Ukraine to Europe.¹⁵ Concerns were echoed by scattered reports

4 Wagner, M. (2022). [The war in Ukraine and the renaissance of temporary protection - why this might be the only way to go](#), ICMPD.

5 UNHCR (2023). [Ukraine Refugee Situation](#) (Accessed on 17 May 2024).

6 Ibid. Figures from Poland last updated 15 December 2023, figures from Germany last updated 3 February 2024, figures from Switzerland last updated 5 March 2024.

7 See, for example, IOM (2015) [Addressing human exploitation and trafficking in times of crisis](#); UNODC (2018) [Countering Trafficking in Persons in Conflict Situations](#). UNODC (2022a). [Global Report on Trafficking in Persons](#).

8 UNODC (2022a). [Global Report on Trafficking in Persons](#).

9 [Global Initiative Against Transnational Organized Crime \(2023\) The Vulnerable Millions: Organized Crime Risks in Ukraine's Mass Displacement](#).

10 UNODC (2022a). Op cit.

11 Council of the European Union (2022) [Implementing Decision \(2022/382\)](#).

12 See: <https://www.consilium.europa.eu/en/press/press-releases/2023/09/28/ukrainian-refugees-eu-member-states-agree-to-extend-temporary-protection/>

13 UNODC (2022b). [Conflict in Ukraine: Key evidence on risks of trafficking in persons and smuggling of migrants](#), MMC (2023a). [How to break the business model of smugglers](#).

14 UNODC (2022b) Op cit.

15 See, for example UN (2022). [Secretary-General's remarks to the Press on the war in Ukraine](#); UNHCR (2022). [Ukraine crisis creates new trafficking risks](#); IOM (2022). [IOM warns of increased risk of trafficking in persons for people fleeing Ukraine](#); Euronews (2022). ['Huge risk' Ukrainian children can fall into trafficking, says EU Commissioner](#); Rosenzweig-Ziff, D., Stanely-Becker, I. & Glucroft W. N. (2022). [With mostly women and children fleeing Ukraine, European authorities fear a surge in human trafficking](#), Washington Post.

about cases of exploitation and trafficking in persons linked to the onset of large-scale displacement from Ukraine.¹⁶ Comprehensive and coordinated measures to combat trafficking in persons were implemented across the EU, including but not limited to the EU Common Anti-Trafficking Plan¹⁷, guidance by the Council of Europe's anti-trafficking body¹⁸, recommendations to mitigate risks of online trafficking by the Organization for Security and Co-operation in Europe (OSCE)¹⁹, updates of official EU and member state, and civil society websites with advice on how to avoid being trafficked.²⁰

Two years on, existing evidence does not seem to support concerns about a significant surge in trafficking cases linked to the war in Ukraine.^{21,22} As mentioned earlier, this is at least partially because legal channels for entry and rapid access to legal status are important factors for bolstering resilience against trafficking. However, it could also be attributed to trafficking cases not yet coming to the authorities' attention. Cases may surface gradually, and ongoing reports indicate the need for further research efforts to understand people's experiences and further improve identification and support measures.²³

This research, implemented by MMC in partnership with UNODC, applied a mixed methods, phased approach, aiming to contribute to the emerging evidence base on resilience and vulnerability to exploitation and trafficking²⁴ experienced by people fleeing the war in Ukraine. The analysis draws on 1,602 surveys with Ukrainians and non-Ukrainians conducted between February and March 2023 across Berlin (400 surveys), Bern (593 surveys), and Warsaw (609 surveys), in addition to 57 semi-structured interviews with key informants (21 in Berlin, 19 in Bern, 15 in Warsaw, 2 with international actors) conducted in two phases between December 2022 and March 2024. It explores the situation of people who fled Ukraine in Warsaw, Bern, and Berlin, providing insights into their journeys, challenges in accessing basic services and livelihood opportunities in countries of displacement²⁵ and potential incidents of work-related exploitation and trafficking in persons for the purpose of forced labour and/or sexual exploitation. This research was produced alongside a complementary study under the same project conducted by UNODC, presenting research findings on the incidence and trends of trafficking and smuggling among people fleeing Ukraine.

This research considered risk factors for exploitation and trafficking to better understand their shape, nature, and intensity. It was founded on the following research questions:

- What are the main vulnerabilities to TIP among people who have fled Ukraine? Are some populations more vulnerable than others to TIP, both during their journey and in the host cities?
- What are the main protection needs in host cities of people who have fled Ukraine?
- How do these protection needs reinforce/create vulnerabilities to TIP?
- Have challenges in accessing livelihoods/housing opportunities increased vulnerability to TIP and exploitation?
- To what extent has the use of smugglers reinforced/created vulnerabilities to TIP?
- What have been local and national authorities' responses to TIP since February?

Findings from this research aim to contribute to a better, evidence-based understanding of dynamics of vulnerability to exploitation and trafficking in Ukraine during a specific point in the displacement crisis. This research aims to serve as a basis for designing interventions by UN organizations, NGOs, and national and local authorities.

16 See, for example Tondo, L. (2022). [Ukraine prosecutors uncover sex trafficking ring preying on women fleeing country](#). The Guardian; Fallon, K., Cundy, A. & Crean, M. (2022). [Vigilantes stalk Ukraine border as sex traffickers target fleeing women and children](#). The Guardian.

17 EU Anti-Trafficking Coordinator (2022) [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](#).

18 Council of Europe (2022). [GRETA issues Guidance Note on addressing the risks of trafficking in human beings related to the war in Ukraine and the ensuing humanitarian crisis](#).

19 OSCE (2022). [Recommendations on enhancing efforts to identify and mitigate risks of trafficking in human beings online as a result of the humanitarian crisis in Ukraine](#).

20 See, for example, the [European Commission website for people fleeing Ukraine](#), the [Swiss State Secretariat for Migration website](#), the [La Strada International website](#).

21 UNODC (2022b). Op cit.; UNODC (2024, forthcoming). Study on trafficking in persons and smuggling of migrants in the context of displacement caused by the war in Ukraine.

22 Official data on trafficking in persons for 2023 and 2024 was not yet available at the time of writing.

23 UNODC (2022b). Op cit.; IOM (2023) [Human trafficking in times of conflict: the case of Ukraine](#).

24 Risks of abuse, exploitation, and trafficking during refugees' journeys from Ukraine to Poland, Germany, and Switzerland were reported by Ukrainian refugees and key informants across all three cities under study. This study examines indications of abuse or exploitation reported by respondents that could represent elements of trafficking cases. For detailed definitions and distinctions, please refer to the Terminology section.

25 See findings from the same survey previously published in MMC briefing paper series [Displaced from Ukraine to Bern](#), [Displaced from Ukraine to Berlin](#), [Displaced from Ukraine to Warsaw](#).

After this introduction, Section 3 provides a short background on this study's research methodology and terminology. Section 4 briefly outlines research findings on the incidence and indications of different forms of trafficking in persons and exploitation, further explored in UNODC's complimentary report, to better contextualize the subsequent discussion on factors of vulnerability and resilience. Section 5 delves into factors of vulnerability and resilience to exploitation and trafficking experienced by people who fled the war in Ukraine to Berlin, Bern and Warsaw, drawing primarily from qualitative data and referencing where relevant data from the quantitative surveys. Finally, Section 6 provides recommendations, drawing from the analysis of research findings, as well as from interviews with key informants.

3. Methodology

The study applied a mixed-methods approach to better understand the risks of trafficking in persons and smuggling of migrants in the context of the journeys of Ukrainians and non-Ukrainians fleeing the country since the full-scale invasion began. Phase I of the project (September 2022 – June 2023) focused on quantitative data collection, complemented with a limited number of qualitative interviews. The quantitative data collection carried out during Phase I captured some indications of potential cases of smuggling of migrants and trafficking in persons, which necessitated further qualitative research. Hence, phase II of the project (September 2023 – May 2024) aimed to collect additional qualitative data on existing forms of trafficking in persons, resilience, and vulnerability factors. Fieldwork was conducted in three cities, including Berlin and Warsaw, which are two major destinations for Ukrainian refugees, as well as Bern. The methods included reviewing secondary literature, conducting a survey, and holding two rounds of in-depth interviews with key informants, including displaced people. Finally, the information from these various methods were triangulated and analysed. The research methodology, approach and tools were collaboratively developed by UNODC and MMC and adhere to both organization's quality standards for research and follow ethical principles and practices for conducting research with vulnerable groups.

3.1 Desk review

The study draws on a range of grey literature and media reports from: international organizations, international and local NGOs in Bern, Berlin and Warsaw specializing in migration and protection, international agencies and NGOs specializing in counter-trafficking, and international and regional media.²⁶

3.2 Quantitative data collection

Survey questionnaire

The structured survey questionnaire²⁷ used for quantitative data collection covered the following themes: respondents' profile and financial situation when leaving the country, steps taken in preparation for their journey, their journey and decision-making including the use of smuggling services, paid bribes and potential cases of exploitation en route, their experiences in the city of interview including access to services, potential debts, favoured channels to find information or services, and migration intentions. The questionnaire also includes an open-ended question regarding respondents' migration experience.

Respondents' profiles

This analysis is based on 1,602 surveys conducted between February and March 2023 across Bern (593 surveys), Warsaw (609 surveys) and Berlin (400 surveys), during face-to-face interviews with Ukrainians and non-Ukrainians displaced from Ukraine since February 2022. Respondents were identified through purposive and snowball sampling, based on the following criteria:

²⁶ See footnotes throughout this report.

²⁷ See findings from the same survey previously published in MMC briefing paper series [Displaced from Ukraine to Bern](#), [Displaced from Ukraine to Berlin](#), [Displaced from Ukraine to Warsaw](#).

- Being a Ukrainian national or non-Ukrainian national who resided in Ukraine²⁸ and left the country after February 2022;
- Being 18 years old or older;
- Being settled in the city of interview for a minimum period of 1 month.

Table 1: Profile of respondents

		Berlin (n=400)		Bern (n=593)		Warsaw (n=609)	
		Ukrainian	Non-Ukrainian	Ukrainian	Non-Ukrainian	Ukrainian	Non-Ukrainian
Gender	Women	247	34	470	1	412	45
	Men	72	46	113	8	97	55
	Other	1	0	1	0	0	0
	TOTAL	320	80	584	9	509	100
Age group	18-36	155	55	169	3	297	81
	37-81	165	25	415	6	212	19
	TOTAL	320	80	584	9	509	100
Legal status	Temporary protection	265	61	575	9	395	30
	Refugee	47	1	1	0	70	14
	Temporary resident (with permit/visa, inc. tourist visa)	1	13	2	0	15	15
	Asylum seeker	5	3	0	0	12	22
	Applied for permit/visa	0	1	2	0	5	12
	Other	2	1	4	0	12	7
	TOTAL	320	80	584	9	509	100

Of the 1,602 survey respondents, 88% (1,414 individuals) are Ukrainian citizens from various regions in Ukraine. The most represented areas include Kyiv (city with special status) at 23%, Kyiv Oblast at 9%, followed by Kharkiv (9%), Dnipropetrovsk (7%), Odesa (5%), Zaporizhzhia (5%), Lviv (5%), and Vinnytsia (4%). A significant majority of Ukrainian citizens (96%) identify ethnically as Ukrainian, with 6% identifying as other ethnicities and 1% as Russian (multiple responses were allowed in the survey).

The survey also included 184 respondents from non-EU countries: 9 respondents in Bern, 99 respondents in Warsaw, and 76 respondents in Berlin. These survey participants primarily include 103 individuals from Belarus (predominantly surveyed in Warsaw), 17 Moldovans, 13 Azerbaijanis, 11 Armenians, and 7 Russians, as well as fewer than five respondents each from Morocco, Georgia, Syria, India, I.R. Iran, Türkiye, Israel, Tajikistan, Turkmenistan, Nigeria, Iraq, and Kyrgyzstan. Additionally, six EU citizens, from Romania, Hungary, Latvia, and Czechia, who had been residing in Ukraine at the time of the invasion, were surveyed in Berlin and Warsaw.

In terms of gender breakdown, the survey population comprised 1,209 women (75%), 391 men (24%), and 3 respondents who either identified as other, preferred not to answer, or refused (1%). Half of the respondents are between the ages of 25-44, with the remaining respondents aged 45-64 (23%), 18-24 (19%), and over 65 (7%). 37% indicated being married, and 48% of men and 36% of women identify as single. Additionally, 11% of the respondents are separated or divorced, 7% are widowed, and another 7% are in domestic partnerships. Most respondents who

²⁸ While the non-Ukrainian sample mostly includes non-EU citizens, there are a small number who are EU citizens.

answered questions about sexual orientation identify as heterosexual (97% or 1,412/1,460), while 3% (42/1,460) identify as LGBTQI+.

In terms of education, the majority of respondents have completed secondary school (96%), with 60% holding a university degree, and another 23% having completed vocational training. More women hold university degrees compared to men (62% vs. 53%).

About one-third (30%) of respondents travelled from Ukraine to their current location with children, another third (30%) travelled alone, 24% travelled with family members, 21% with their partner, and 11% with friends.²⁹ More men (34%) travelled alone or with their partner (35%), while more women (34%) than men travelled with their children. Additionally, women accounted for the majority of those travelling with other people’s children (85%, or 29 out of 34). Just over half (53%) started their journey within the first two months of the large-scale invasion in early 2022.

Sampling strategy and locations

MMC used a non-randomized, purposive sampling approach for quantitative data collection, controlling for gender and age. The sample aims to achieve diversity and was primarily carried out through social networks, access to targeted and diverse places of residence such as hostels, shelters and private accommodations. In Bern, surveys were also conducted in Bernese Oberland and in Bern-Mittelland, to ensure a mix of urban and rural areas.

3.3 Qualitative data collection

Key informant interviews

To complement the quantitative data collected through surveys, the project also gathered qualitative insights through key informant interviews (KIIs). A total of 28 semi-structured interviews were conducted between December 2022 and May 2023 (phase I), with an additional 24 interviews conducted between December 2023 and March 2024 (phase II). Some organizations and individuals were interviewed twice, allowing for deeper exploration of key themes and how they have evolved over time. KIIs with experts explored the same thematic themes as the survey questionnaire and respondents were identified based on their expertise including representatives from NGOs, UN and international organizations, academia, research, journalism, as well as local and federal/national authorities.

Table 2: Profile of key informants

		Berlin (n=21)	Bern (n=19)	Warsaw (n=15)	International (n=2)	Total
Type of Actor	NGO/Civil society	12	11	8	0	31
	Academia/Research	2	0	3	0	5
	Journalism	0	0	1	1	2
	Local and federal authorities	6	4	0	0	10
	UN agencies	0	0	1	1	2
	Other experts	1	4	2	0	7
	TOTAL	21	19	15	2	57

²⁹ Respondents can name more than person with whom they left Ukraine.

3.4 Limitations

Some limitations to the data are worth noting. As the project's sampling process was not randomized, findings are only indicative and not representative of the entire population of people who fled Ukraine residing in Bern, Berlin, and Warsaw. The research aimed to include the experiences of non-Ukrainians from outside the EU who fled Ukraine since the full-scale invasion began. In Berlin and Warsaw, a minimum quota of non-Ukrainian nationals who fled Ukraine were included in the sample, however in Warsaw, it mainly consisted of Belarusians. In Bern, this diversity was not achieved, despite our best efforts to interview non-Ukrainian respondents within the limited timeframe and given the resources of this research we could only speak to a few. No children (under 18 years of age) were consulted for this research.

Given the sensitive topics explored in this research, the likelihood of respondents underreporting instances of exploitation and trafficking due to fear of judgment, retaliation or punishment is possible. To mitigate this sensitivity bias, as well as ensure respondents were not endangered by their participation in the survey in a 'do-no-harm' approach, the survey focused on the identification of risk factors, and general questions about witnessing suspicious cases, rather than on capturing individuals unreported cases of exploitation and trafficking. In addition, qualitative data collected through key informant interviews ensured MMC had access to alternative sources and data to complement and cross-examine quantitative data, in a mixed-methods approach.³⁰

3.5 Terminology

Smuggler and smuggling: The MMC uses a broad interpretation of the terms 'smuggler' and 'smuggling', one which encompasses various activities — paid for or otherwise compensated by refugees and migrants — that facilitate irregular migration. These include irregularly crossing international borders and internal checkpoints, as well as providing documents, transportation, and accommodation. This approach reflects refugees' and migrants' perceptions of smuggling and the facilitation of irregular movement. Our interpretation is deliberately broader than the UN Protocol against the Smuggling of Migrants definition. However, this does not imply that MMC considers all activities it includes in its broad understanding of smuggling to be criminal offences. MMC prefers to use the term 'human smuggling' instead of 'migrant smuggling' as smuggling involves both refugees and migrants. This publication is produced in partnership with the United Nations Office on Drugs and Crime (UNODC) Observatory on Smuggling of Migrants. The Observatory uses the word 'smuggler' when it can reasonably be assumed that the crime of migrant smuggling is constituted, as per Article 3 of the UN Smuggling of Migrants Protocol, while the word 'facilitator' is used whenever the elements of (a) irregular entry and/or (b) financial or material benefit, could reasonably be assumed not to be in evidence.

Trafficking in Persons/Human trafficking: According to the UN Trafficking in Persons Protocol, trafficking in persons is defined 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 the 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 over 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 the removal of organs." If the victim is a child (any person under 18 years), the means set out in the definition are irrelevant and the trafficking act with the exploitative purpose are considered sufficient to constitute child trafficking.

Exploitation: In this report the term exploitation refers to, 'the act of taking advantage of something or someone, in particular taking unjust advantage of another for one's own benefit (e.g., prostitution or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs)'.³¹

³⁰ Additional ethical safeguards included: Interviewers informed respondents that they would not benefit from the research, no harm would come to them if they decided to not participate, and they could opt out of the interview or specific questions at any time. The possibility to opt out was reiterated before particularly sensitive questions. Respondents were also informed they would remain anonymous, and no information provided would be able to be traced back to them.

³¹ European Commission (2024). [European Migration Network Asylum and Migration Glossary](#) (Accessed on 17 May 2024).

4. General findings on risks of exploitation and trafficking

Building on the quantitative and qualitative data collected under this project, UNODC's complementary report illustrates research findings on the incidence and indications of different forms of trafficking in persons and of smuggling of migrants. The UNODC study also includes three in-depth case studies of potential trafficking cases. Based on UNODC's report, this section provides a brief overview of the types of potential cases of trafficking in persons and work-related exploitation reported by respondents in Berlin, Bern and Warsaw and by key informants (KIs).³² In doing so, it seeks to better contextualize the subsequent discussion on factors of vulnerability and resilience.

Among the 1,602 individuals who fled Ukraine to Bern, Berlin and Warsaw and participated in this survey, 9% of respondents (138 people) either personally encountered or witnessed other Ukrainians facing problems at work or with their accommodation after arriving in the survey country, with issues ranging from signs of potential trafficking to general abuse and mistreatment. The majority of reported problems were concentrated in Warsaw, accounting for 54% of the cases (75 incidents), while 26% were reported in Bern (36 incidents) and 20% in Berlin (27 incidents). The most commonly reported issues included difficulties finding accommodation and experiencing discrimination when seeking or engaging in employment. In Warsaw, most problems (91%) were related to workplace conditions, whereas in Bern, 70% of the issues were linked to accommodation. In Berlin, 61% of the problems involved accommodation, and 44% were related to the workplace. Potential abuse and exploitation in the accommodation context often involved arrangements where individuals worked, either paid or unpaid, in exchange for housing. Some of these situations showed possible indicators of trafficking in persons.

Forced labour

Six percent of respondents reported a type of workplace abuse, with two percent (35 people) experiencing or witnessing potential trafficking for forced labour.³³ Most indications referred to situations witnessed rather than directly experienced by the respondents. The potential cases mainly involved situations of non-payment of wages or where pay was less than promised; deception in relation to the type of work; excessive working hours or unsafe working conditions; and deception about who the employer was. The majority of people interviewed who reported incidents of abuse and exploitation were surveyed in Warsaw (32). In six of these cases, workers had their personal identity documents kept by their employer, among other abuses. In four cases, workers were threatened with being deported by their employer, and/or were forced to do something against their will. In three cases, they were forced to do illegal or illicit work activities. A further three were harmed at the workplace, and/or prevented from moving around freely or speaking to people, and one was locked up or restrained.

Labour law violations

Key informants in Warsaw, Berlin, Bern, confirmed the relatively low incidence of forced labour but noted **widespread labour law violations among Ukrainian refugees**. These violations, weakening the safety nets that should protect people and creating an environment where exploitation can easily occur, make refugees more vulnerable to trafficking, with significant issues like unpaid wages, delayed payments, lower pay compared to local workers, and poor working conditions. Labour intermediaries in Poland and Germany, exacerbate these vulnerabilities, by often placing people in jobs with poor oversight and protection. High-risk sectors include domestic work, cleaning, care work, construction, manufacturing, agriculture, transportation, logistics, and hospitality, where many women are employed. Although no children were surveyed, key informants in Warsaw and Bern mentioned indications of child labour and trafficking in agriculture, construction, begging, and domestic work.

32 For a detailed analysis of incidence of forced labor and types of abuses, as part of this project, see: UNODC (forthcoming, 2024). Op. cit.

33 This includes respondents who reported at least two types of abuses at the workplace (out of 12 possible options), including at least one of the following: "Someone was physically forced to do something", "Someone was locked up or restrained", "Someone was physically harmed (e.g., beaten, slapped, hit, kicked, punched, burned)", "Someone was prevented from moving around freely or speaking to people", "Someone's ID documents were kept by their employer or host?", "Someone was threatened of being deported", "Someone was threatened of being physically harmed", "Someone was forced to do illegal or illicit work or activities", "Someone was forced to perform sexual acts" and "Someone was forced to engage into prostitution". See: UNODC (forthcoming, 2024). Op. cit.

Sexual exploitation

A small percentage of survey respondents mentioned instances of people fleeing Ukraine working in sex work or prostitution: four percent in Berlin (15 respondents), two percent in Warsaw (14 respondents), and two percent in Bern (12 respondents). However, these figures may likely be underreported due to high levels of stigma. Among the 41 instances, seven reported that they believed that people were in situations of forced prostitution, with six of these cases occurring in Warsaw. This suggests a prevalence of 0.4 percent for witnessing forced prostitution, which could also potentially indicate trafficking for sexual exploitation. Notably, none of the 1,602 survey respondents reported being sexually exploited in prostitution themselves. Key informants also noted instances where some Ukrainian women were engaging in prostitution. Without more detailed information, it is challenging to determine whether these instances involve trafficking for sexual exploitation or forced prostitution. Nevertheless, some cases suggest a high level of vulnerability. While registered sex work is legal in the countries under study, Ukrainian refugees with S status can not easily obtain working permits for this sectors in some cantons. The research highlighted risk factors for exploitation, especially in erotic massage parlours and at accommodation centres, including individuals providing accommodation requesting transactional sex from vulnerable women.

5. Factors of vulnerability and resilience to exploitation and trafficking

The quantitative data presented above shows **reported incidents of abuse and exploitation that could indicate cases of human trafficking but do not explain the complex dynamics that make individuals vulnerable as potential victims**. This section delves into factors of vulnerability and resilience to exploitation and trafficking experienced by people who fled the war in Ukraine to Berlin, Bern and Warsaw, drawing primarily from qualitative data and referencing where relevant data from the quantitative surveys.

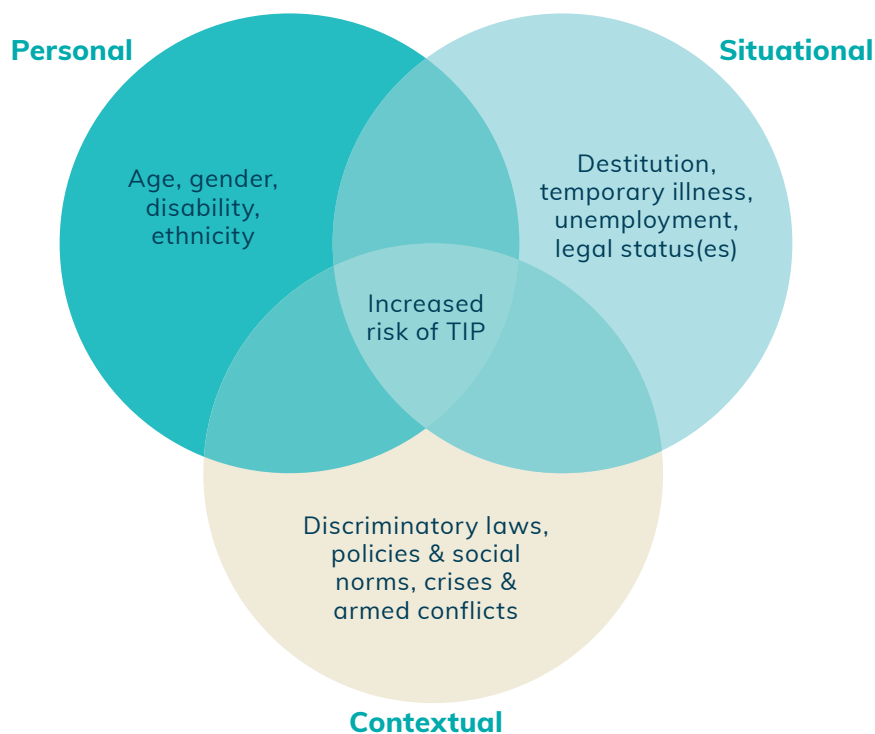
According to the Inter-Agency Coordination Group against Trafficking in Persons (ICAT), vulnerability to trafficking is influenced by the intersection of various factors at different levels, including personal, situational, and contextual dimensions³⁴:

- **Personal factors:** These refer to individual characteristics that may increase susceptibility to trafficking. These factors include age, gender, disability, and ethnicity. For example, younger individuals or those with disabilities may be more vulnerable to exploitation due to their perceived lack of power or ability to protect themselves.
- **Situational factors:** These are conditions or circumstances that individuals find themselves in, which can heighten their risk of trafficking. Situational factors include destitution, temporary illness, unemployment, and legal status. Individuals experiencing economic hardship or health crises, or those with uncertain legal status, are often at greater risk because they may be more desperate for employment or support, making them easier targets for traffickers.
- **Contextual factors:** These factors encompass the broader socio-political and economic environment that can influence an individual's risk of trafficking. Contextual factors include discriminatory laws, policies and social norms, crises, and armed conflicts. For instance, societal norms that marginalize certain groups or policies that restrict migrants' rights can create environments where trafficking can thrive.

Building on the conceptual framework outlined by ICAT, the analysis aims to identify the existence of key personal, situational, and contextual factors that may increase risks of exploitation and trafficking in the context of displacement from Ukraine.

34 Inter-Agency Coordination Group against Trafficking in Persons (2022) [Addressing vulnerability to trafficking in persons](#)

Figure 1: Intersection of vulnerability factors that can increase risk of TIP, adapted from ICAT Issue Brief 12



5.1 Vulnerability factors

Personal

Personal factors refer to individual characteristics that can heighten susceptibility to exploitation and trafficking. The analysis below highlights groups identified by key informants who may be more vulnerable to exploitation and trafficking than others in specific circumstances. These groups include women, children, the elderly and people with disabilities, Ukrainian Roma, people with non-Ukrainian nationality who fled Ukraine, and highly traumatized individuals. While not inherently vulnerable, each of these groups faces unique and intersecting challenges that can increase their risk of exploitation and trafficking under certain circumstances.

Women and children

Women and children continue to make up the majority of the temporary protection beneficiaries in the EU.³⁵ Warnings have been issued by international organizations, media outlets and civil society groups especially about heightened risks of trafficking for sexual exploitation.³⁶ Informants interviewed for this research, particularly noted the **increased vulnerability of women, with regards to their financial pressures, such as providing for family in Ukraine, but also difficulties combining work with caregiving responsibilities.**³⁷ While financial need might make women more vulnerable to situations of exploitation and trafficking, case studies collected under this research also show instances where women successfully exited situations of exploitation and trafficking, showcasing their agency.³⁸ Key informants also noted that **women living in temporary shelters also face a heightened risk of gender-based**

35 Eurostat (2024). [4.1 million people under temporary protection in July](#).

36 See for example, OHCHR (2022). [Ukraine: Armed conflict and displacement heightens risk of all forms of sexual violence including trafficking in persons, say UN experts](#). Washington Post (2022). [With mostly women and children fleeing Ukraine, European authorities fear a surge in human trafficking](#).

37 2DE-K-04, 2DE-K-05, 2DE-K-03, 2DE-K-06, 2DE-K-07, 2DE-K-09, 2PL-K-04, 2PL-K-05, 2CH-K-06.

38 For in-depth case studies collected as part of this project, see: UNODC (2024). *Assessment of Human Trafficking and Migrant Smuggling in the context of the Ukrainian War*.

violence, and that **private hosting arrangements can present risks of exploitation and sexual abuse**, with refugees inherently dependent on host families.³⁹ UNICEF has warned that many children are unaccompanied or separated from their families, putting them at increased risk of violence, exploitation, and abuse.⁴⁰ While no children were interviewed or surveyed for this research, key informants in Warsaw and Bern mentioned observing potential incidents of child labour and child trafficking.⁴¹

Disabled and elderly people

A 2023 UNHCR survey of families in Ukraine's neighbouring countries revealed that 22% of the families had a member with a specific need, disability, or serious medical condition, and these families typically struggled more to meet their basic needs.⁴² Individuals who are elderly or who live with a disability frequently rely on other for support or need assistance to fulfil their basic needs, **services in receiving countries have struggled to respond**.⁴³ When individuals cannot obtain the required care and support, this can make them more susceptible to exploitation and abuse.

According to one informant interviewed in **Bern**, people with disabilities faced particularly difficult journeys “Many people with disabilities were stranded in Ukraine and did not have enough money or help to leave. [...] Some people suffered heart attacks or died presumably because of the stress. Trains from Ukraine to Chełm, [eastern] Poland, had up to 200 people in one train carriage. It was difficult for people with disabilities to get on the train. It was difficult for them to bring what they needed to support their disability. Some people boarded the trains without their wheelchairs, due to lack of space, and many people travelled without their documents.”⁴⁴ In host countries, people with disabilities who fled the war in Ukraine experience difficulties accessing the job market, and they often live in isolation, due to buildings not being accessible and little activities available tailored to their needs.⁴⁵ In Bern informants explained that there is an emerging trend, where women with disabilities are targeted by men of conscription age who want to marry them in order to be able to leave Ukraine.⁴⁶ Exploitation can occur when some men, after leaving Ukraine, neglect the women they married, either leaving them without documents or money, or becoming abusive towards them.⁴⁷

Illustrative case study 1

Abuse of a Ukrainian woman with a disability by her husband in Germany

“A Ukrainian woman’s social worker asked her to marry him so he could leave Ukraine. They are currently living in an accommodation centre in Germany. She showed us a photo[...]. The conditions looked worrying; it was a big open space. According to the woman, her former social worker started physically and mentally abusing her when they arrived in Germany – not preparing food for her and not helping her go to the toilet. The woman called a hotline for domestic abuse in Germany and a hotline set up by a Ukrainian disability rights activist.”⁴⁸

In **Warsaw**, one informant mentioned that refugees with disabilities don’t receive a lot of support from the state.⁴⁹ Two informants mentioned in Poland also mentioned that elderly people lack special protection and support.⁵⁰ They are scared that since they don’t work, they won’t be able to apply for another form of residence status when the temporary protection status ends.⁵¹ Some pensioners are being denied social safety nets in Poland because they are receiving a pension from Ukraine, however the money is not sufficient to live on in the context of Poland.⁵²

39 2DE-K-03, 2DE-K-05, 1PL-K-08, 2PL-K-05, 2CH-K-02, 2CH-K-04.

40 Unicef (2022). [Guidance for protecting displaced and refugee children in and outside of Ukraine](#).

41 2PL-K-05, 2PL-K-01, 1CHK-K-10, 1CH-K-11.

42 UNHCR (April 2023). [Acute needs of older Ukrainian refugees and those with disabilities must not be overlooked](#).

43 2DE-K-07; 2CH-K-01; 2PL-K-03.

44 2CH-K-01.

45 2PL-K-04, 2PL-K-05, 2CH-K-01, 2DE-K-10.

46 2CH-K-01, 2CH-K-02, 2CH-K-04.

47 2CH-K-01.

48 2CH-K-01.

49 2PL-K-05

50 2PL-K-04, 2PL-K-05.

51 2PL-K-04.

52 2PL-K-05.

Non-Ukrainian Nationals

At the onset of the war, Ukraine had a considerable population of non-Ukrainian citizens who were in the country for work, educational purposes or other reasons. **Many experienced discrimination when crossing borders and difficulties in obtaining legal status, rights and services in neighbouring countries.**⁵³ Informants described that some Belarusians who fled Ukraine to Poland faced difficulties in renewing their passports and maintaining a regular legal status in Poland.⁵⁴ Similarly, a Thai NGO in Berlin reported assisting Thai nationals who fled Ukraine, as they are experiencing issues with residence permits.⁵⁵

Ukrainian Roma

Ukraine also has a large community of Roma people, with the most numerous Roma communities in Zakarpattia (western Ukraine), Odesa (southern Ukraine) and Kharkiv (eastern Ukraine) oblasts. Upon fleeing Ukraine, **these individuals faced significant discrimination and unequal treatment at border crossings and in accessing assistance in host countries.** While Ukrainian citizens of Roma ethnicity fall under the EU Temporary Protection Directive, it is sometimes not granted to them due to discrimination. Informants for this research indicate that Ukrainian Roma have been placed in segregated accommodation and have reduced access to essential service.⁵⁶

Trauma

Many people fleeing the war in Ukraine are disoriented, **traumatized and in need of psychological support. Difficult living conditions can exacerbate this stress and lead to detrimental coping mechanisms.**⁵⁷ One informant in Bern explained that post-traumatic stress disorder (PTSD) plays a major role in some people not being active in the job market.⁵⁸ Another informant interviewed in Bern considers particularly young Ukrainian men who had to leave the country irregularly a traumatized and vulnerable group: “Young men are trapped.”⁵⁹ Another informant, in Berlin, explained that she met a woman working in a brothel who was entirely apathetic, who had experienced sexual violence on her way to Germany and upon arrival her child was taken away from her by the welfare offices.⁶⁰

Situational

People who fled the war in Ukraine can become more vulnerable to exploitation and trafficking due to the specific conditions or circumstances they find themselves in. Risk factors identified in this research, and elaborated below, can include financial pressure, difficulties in accessing decent work (including barriers such as lack of knowledge of the local language, difficulties in finding skill-appropriate work), insufficient knowledge of labour laws and legal rights, and distrust of authority.

Financial pressure

Economic hardship and the need to support oneself and family members can increase pressures to find work quickly and to accept precarious working conditions. Most individuals who fled Ukraine have obtained a legal status in receiving countries that enables them to access the labour market and a wide array of essential services. However, financial pressure was mentioned by informants across Berlin and Warsaw, as a potential factor contributing to vulnerability to exploitation and trafficking among displaced individuals. In Bern the issue emerged less prominently, possibly linked to the fact that social benefits are reportedly high enough to live on decently. With financial pressure identified as a challenge, this is reflected among survey respondents, across all three locations, employment and cash were among top three needs of respondents across all three locations of interview.⁶¹

In **Berlin**, informants highlighted the pressures on people to earn money to support themselves and their families in Ukraine who are facing economic hardships.⁶² One informant also spoke of a “block-in effect”, where people started

53 ENAR (2022). Racist double standards persist at EU/Ukraine borders and beyond, European Union Agency for Fundamental Rights (FRA) (October 2022). [The Russian War of Aggression against Ukraine — The Broad Fundamental Rights Impact in the EU Bulletin #2.](#), 1PL-K-02, 2PL-K-02.

54 2PL-K-02, 2PL-K-05.

55 2DE-K-02.

56 2DE-K-04, 2PL-K-05.

57 Hoff, Suzanne & Eefje de Volder (May 2022). [Preventing human trafficking of refugees from Ukraine: A rapid assessment of risks and gaps in the anti-trafficking response.](#) La Strada International & Freedom Fund

58 2CH-K-03.

59 2CH-K-04.

60 2DE-K-08.

61 See findings from the same survey previously published in MMC briefing paper series [Displaced from Ukraine to Bern, Displaced from Ukraine to Berlin, Displaced from Ukraine to Warsaw.](#)

62 2DE-K-08, 2DE-K-01, 2DE-K-05

working in low-skilled jobs because they thought they would not stay in Berlin for long, however if they resign they are ineligible to receive unemployment benefits for three months which they can't afford, so they continue working.⁶³

"Many women and children face financial constraints and insufficient resources. If their financial situation worsens, or they are pressured to take jobs but can't secure one, it will exacerbate their vulnerability, leading to greater exploitation."⁶⁴

Key informant, Ukraine Dim e.V., Berlin, March 2024

One informant working in Berlin with an NGO specialized in services aiding women who wish to exit prostitution, highlighted on the flipside how one of the women she is accompanying did not carry the financial burden for her family, making it somewhat easier to leave her work in an erotic massage parlour, where there were signs of exploitation (i.e. confiscation of documents).⁶⁵

An NGO worker interviewed in **Warsaw** confirmed that "many try to get work as fast as possible, they have to pay for their apartment and other things, so they accept to be paid less as it's urgent to have a job."⁶⁶ Further, a key informant in Warsaw noted, people are not always aware on how to access available assistance:

"When new forms of assistance are introduced, the municipality or government announces them through official decrees. However, many people remain unaware of these updates and their own rights, leading them to find ways to manage and address their problems on their own."⁶⁷

Key informant, Polish Migration Forum Foundation, Warsaw, February 2024

In **Bern** one respondent noted that she could see the prices for cleaning services hired by individuals declining over time, from 30 CHF/h (approx. 30 EUR) in January 2023 to 20 CHF/h (approx. 20 EUR) in October 2023.⁶⁸

Social benefits were mentioned as playing an important role in helping Ukrainians to cope with financial pressure.

Social benefits in Poland are comparatively modest, with, at the time of writing, a one-time living assistance of 300 PLN (approx. 63 EUR) per person and 500 PLN (approx. 106 EUR) per child per month. According to at least two key informants, these benefits were deemed insufficient to cope with the rising cost of living in Warsaw, where housing and goods prices have surged by 30-40% since the onset of the crisis.⁶⁹ Consequently, refugees in Poland face greater pressure to secure employment, despite additional cash assistance provided by NGOs and international organizations to Ukrainians in the country. One informant also highlighted that more and more shelters are disappearing and are no longer financed and under temporary protection one has the right to social accommodation only for a few months.⁷⁰ In contrast, Ukrainian refugees in Berlin registered with the job centre receive a monthly allowance of 563 EUR and additional support towards accommodation costs.

63 2DE-K-01.

64 2DE-K-06.

65 2DE-K-08.

66 2PL-K-01.

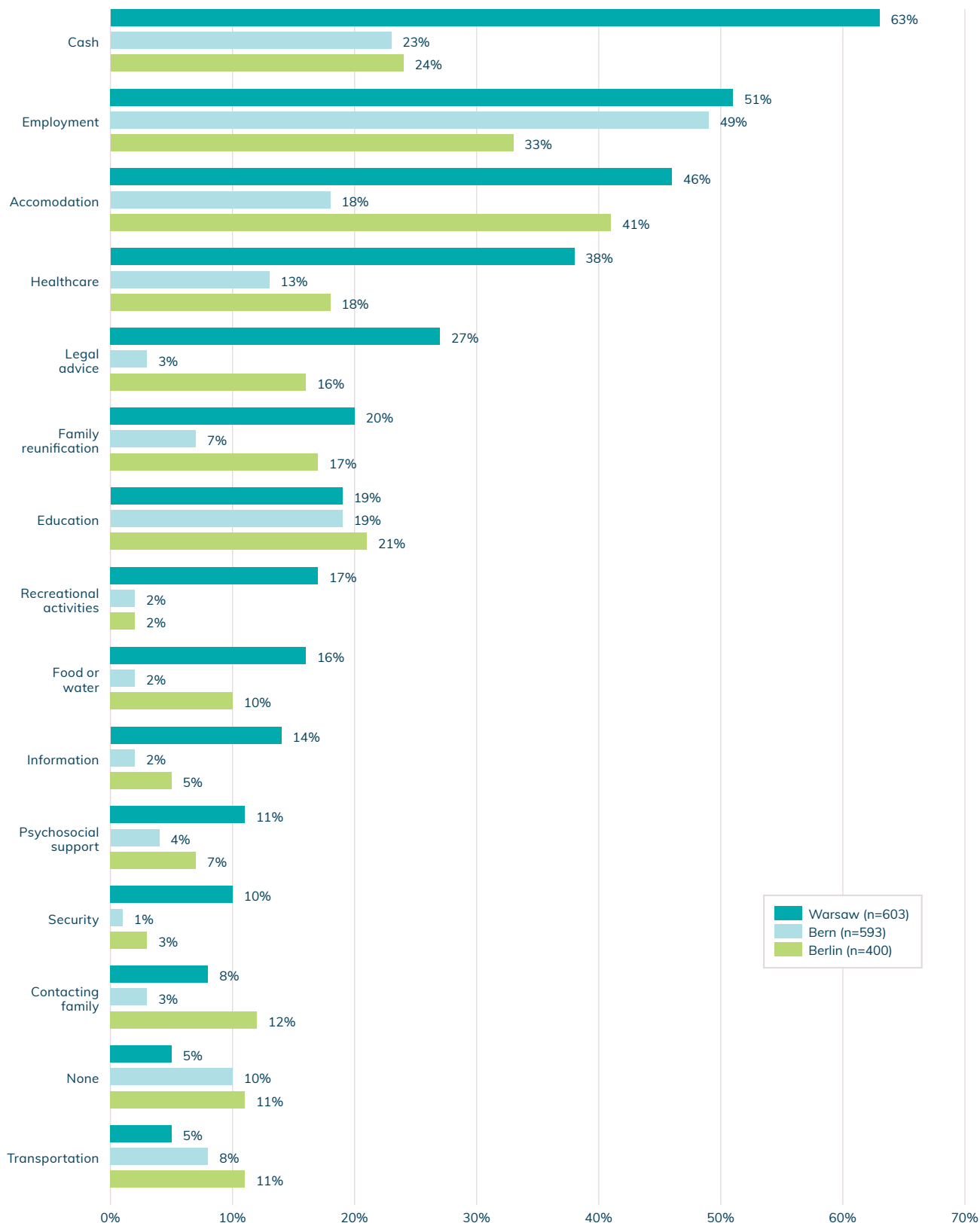
67 2PL-K-03.

68 2CH-K-02

69 1PL-K-06.

70 2PL-K-03.

Figure 2. What are your most pressing needs at the moment?

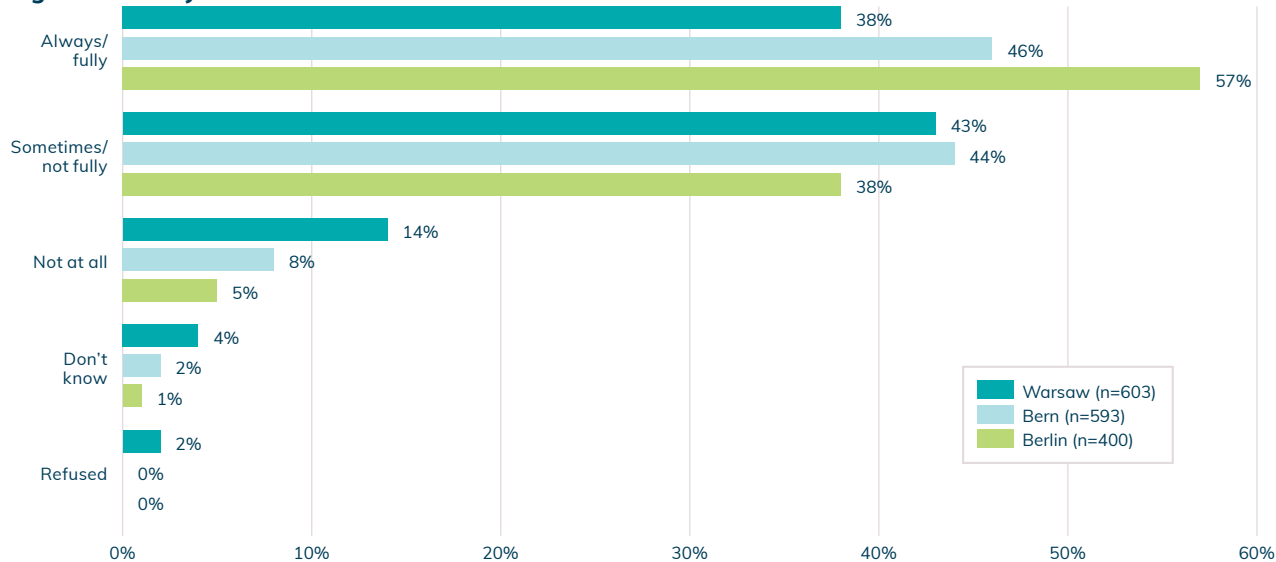


When asked about their current top pressing needs, at the time of survey in 2023, respondents in **Berlin** cited accommodation (41%), employment (33%) and cash (24%).⁷¹ The high demand for accommodation reflects the reality in a city where pressure on housing makes it hard to find affordable, long-term accommodation. In **Warsaw**,

71 MMC (2023) [Displaced from Ukraine to Berlin](#).

respondents similarly cited cash (63%), employment (51%) and accommodation (46%) as top needs (multiple responses possible).⁷² The high demand for cash and employment reflects the immediate financial pressures faced by refugees in Warsaw, exacerbated by the rising cost of living. In **Bern**, almost one out of two people cited employment as a pressing need (49%), followed by cash (23%) and education (19%).⁷³ This indicates that, despite the higher social benefits in Bern, securing employment remains a priority for many refugees, possibly to achieve longer-term financial stability and integration.

Figure 3. Does your household's current financial situation cover all the household's needs?



Finally, in terms of whether their financial situation meets their household needs, in **Berlin** 47% noted these were always/fully covered, while 44% said these were covered only sometimes/not fully. Only 38% of respondents in **Warsaw** said their households' needs were always or fully covered, while 43% said they were only partially covered and 14% said the needs were not at all covered. 46% of respondents in **Bern** stated that these were always or fully covered, while 44% stated that these were not fully covered or covered only sometimes.⁷⁴ This is also highlighted in the SAM-UKR survey 2023, which showed that access to cash or other financial assistance (61%) remains a pressing need, and that the percentage of survey respondents relying on their personal savings for living expenses dropped from 61% in 2022 to less than 30% in 2023.⁷⁵ Despite increasing integration of Ukrainian refugees into the labour market, government financial assistance remains crucial for many to meet their needs.⁷⁶

Limited access to decent work

Ukrainian refugees face challenges in securing decent, skill-appropriate employment. Many find work in lower-skilled jobs where exploitative working conditions may already be present. Both qualitative and quantitative data across Berlin, Warsaw, and Bern highlight the main barriers to accessing decent work including insufficient local language skills and job-skill mismatches/difficulties in recognizing qualifications.⁷⁷

72 MMC (2023) [Displaced from Ukraine to Warsaw](#).

73 MMC (2023) [Displaced from Ukraine to Bern](#).

74 Ibid.

75 OECD/EUAA (2024). [Voices in Europe: Experiences, Hopes and Aspirations of Forcibly Displaced Persons from Ukraine](#).

76 Ibid.

77 2DE-K-02, 2DE-K-03, 2DE-K-06, 2PL-K-01, 2PL-K-04, 2PL-K-05, 2CH-K-05, 2CH-K-07, 1IN-K-02, 1PL-K-07.

Figure 4. Since coming here, what would you consider to be the three main challenges to accessing a decent job or running a business?

	Berlin (n=400)	Bern (n=593)	Warsaw (n=603)
Lack of skills in the local language	86%	80%	67%
The jobs available do not match our skills or qualifications	37%	13%	32%
Lack of documents to validate qualifications	33%	9%	24%
Lack of job opportunities generally	33%	9%	17%
Cost of recognition of qualifications	38%	10%	6%
Don't know	5%	13%	20%
Lack of childcare support	8%	8%	10%
Lack of official documentation (ID, visa, social security affiliation, etc.)	6%	1%	14%
Lack of support for setting up a business	13%	4%	6%
Discrimination	6%	6%	6%
Distance between home and workplace	15%	2%	4%
Cost of transportation to work	14%	2%	3%
Other	8%	4%	3%
Fear of exploitation (unfair treatment, physical, sexual threats, lack of contract, being lied to about the job...)	7%	1%	5%
Refused	2%	1%	3%
Lack of support to take care of relatives	3%	0%	1%

In **Berlin**, survey respondents mentioned several important barriers to accessing a decent job, of which lack of skills in German is by far the most significant, mentioned by 86% of respondents. The cost of recognition of qualifications (38%), a mismatch between skills and job requirements (37%), the overall lack of jobs (33%), and difficulties with the recognition of qualifications (33%) are the other main challenges reported by respondents in accessing a decent job or running a business. In **Warsaw**, the lack of skills in the local language is the most important barrier to decent work for all respondents (67%). The mismatch between jobs and skills and qualification ranks second (32%), and the lack of documents to validate qualifications comes third (24%). In **Bern** even though 35% of respondents reported that they spoke German, a lack of skills in the local language was, by far, the most cited challenge by the respondents (86%) to finding decent work. The data underscores the critical role of language proficiency in accessing employment across different cities and highlights the need for continued access to language classes and the recognition of qualifications to improve job access for refugees.

Further, 8% of those surveyed in Bern and Berlin respectively, and 10% of those surveyed in Warsaw, noted the **lack of sufficient provision for childcare as an obstacle to employment**. A key informant in Warsaw noted that job opportunities in some areas are often limited to shift work in factories, which is particularly challenging for parents. This issue was exemplified by reports of women losing their jobs because they had to stay home with their children when they fell ill.⁷⁸

78 2PL-K-05.

I. Language barriers

Lack of proficiency in the local language can hinder access to high-qualified employment, and can limit ability to assert employment rights, which may increase vulnerability to exploitation and trafficking. When interviewed about vulnerabilities to exploitation and trafficking, informants across all cities noted how language proficiency often determines the type of work one can secure, leading many to accept low-skilled or part-time jobs.⁷⁹

In **Berlin**, authorities have deliberately tied social benefits to language classes, encouraging people to take language lessons for better labour market integration, which suggests a delayed effect in the proportion of people from Ukraine entering the labour market.⁸⁰ It was emphasized that while integration courses are a good step, A2 level of German is not enough for German speaking companies.⁸¹ Therefore, many people with basic language skills are still not able to find a job. An informant in **Warsaw** also highlighted that language is the biggest problem for people when it comes to finding work.⁸² A respondent in **Bern** similarly explained that the biggest problem for Ukrainians in finding work is the language.⁸³

"It's important not to put too much pressure on people to start working too early. Many of them, especially women with children, need time to settle in Germany. They first have to secure day-care and school places for their children and manage their caregiving responsibilities. Additionally, they begin learning German. Achieving proficiency in German takes time—after a year of courses, they might reach B1, and if things go well, B2. However, this is often not sufficient for the type of qualified work they did in Ukraine. A2 or B1 levels are simply not enough for well-qualified jobs."⁸⁴

Key Informant, Advice centre, Berlin, March 2024

Key informants in **Berlin** and **Warsaw** also highlighted that language barriers not only determine the type of work people who fled Ukraine can secure but also limit understanding of employment contracts and opportunities to resolve situations of exploitation and trafficking.⁸⁵ A social worker from **Berlin** illustrated the effect of language barriers, when she tried to communicate with Ukrainian women in a massage parlour. The Ukrainian women working there could not speak German, only one could speak a little English. It seemed to the social worker like they were very intimidated, had no orientation and no idea about their rights, as initially the Ukrainian women working there did not want to let the social workers enter the massage parlour to speak to them.⁸⁶ In **Warsaw**, some informants specifically mentioned the need to speak Polish when contacting the labour inspection office to report a case of labour law violation or labour exploitation.⁸⁷ Another informant explained observing groups of children aged around 12-14 years exploited in begging in Warsaw: he observed the children collecting money, particularly around the Old Town, using donation boxes with a Ukrainian flag.⁸⁸ They present documents showing the organizations they are collecting money for, but they are not legally registered charities.⁸⁹ The key informant reported the situation to the police but there was no follow up, one of the issues being the language barrier with the police communicating with the children in Polish.⁹⁰

II. Difficulties finding skill-appropriate work

The accreditation of diplomas is a key barrier to finding decent, skill-appropriate work. Without recognized credentials, individuals who fled Ukraine are not only blocked from pursuing career advancement but are also more likely to be trapped in informal or insecure employment, where their rights are harder to assert and their risk of exploitation is higher. The issue of recognition procedures across all three locations was largely linked to bureaucratic hurdles and the length of the process, with informants emphasizing the need for more streamlined procedures to facilitate integration.⁹¹ Data by OECD, IOM, UNHCR and FRA indicates that Ukrainian refugees overall have integrated more

79 2PL-K-02, 2PL-K-04, 2DE-K-06, 2DE-K-07, 2DE-K-10, 2CH-K-07, 2CH-K-01, 2CH-K-03.

80 MMC (2023b). Op cit.

81 2DE-K-06.

82 PL-K-04.

83 2CH-K-05.

84 2CH-K-01.

85 2DE-K-06, 2DE-K-01, 2PL-K-02, 2PL-K-04, 2PL-K-05, 2PL-K-01, 2DE-K-10.

86 2DE-K-08.

87 2PL-K-02, 2PL-K-04, 2PL-K-05.

88 2PL-K-01

89 2PL-K-01

90 2PL-K-01.

91 2DE-K-03, 2DE-K-07, 2DE-K-01, 2PL-K-04, 2PL-K-05, 2CH-K-05.

rapidly into labour markets than other refugee groups.⁹² According to 2024 OECD research, much of the employment however is concentrated in low-skilled jobs, with widespread skills mismatches.⁹³ Another research points to a lack of opportunities outside of informal employment.⁹⁴

Figure 5. What kind of sector were you earning money in vs. what kind of sector are you making money in

	Berlin		Bern		Warsaw	
	Before (n=268)	After (n=63)	Before (n=392)	After (n=105)	Before (n=411)	After (n=426)
Small business	16%	13%	24%	11%	31%	24%
Other	22%	13%	21%	13%	11%	10%
Finance / IT	10%	3%	10%	5%	21%	19%
Civil service / teaching	10%	6%	13%	10%	6%	5%
Health worker	8%	2%	8%	2%	7%	4%
Construction	9%	14%	8%	7%	5%	4%
Industry / manufacturing	10%	6%	2%	1%	5%	2%
Hospitality / catering	5%	6%	3%	16%	6%	10%
Agriculture / pastoralism / fishing	4%	0%	3%	2%	3%	1%
Driver / Transportation	4%	8%	3%	3%	3%	5%
Domestic work / cleaning	3%	27%	3%	26%	1%	14%
Police / military	0%	0%	1%	1%	0%	0%
Security	0%	0%	1%	2%	1%	2%
Refused	0%	2%	1%	1%	1%	1%

The majority of survey respondents for this research had a stable income prior to leaving Ukraine (78%). **Survey findings suggest that respondents had to be flexible to find work, and that some of them had to change their usual sector of work after leaving Ukraine.** For example, in **Berlin**, 27% of respondents reported working in the domestic/cleaning sector, compared to only 3% who carried out this work previously in Ukraine. In **Warsaw**, similarly 14% of respondents reported being employed in domestic work/cleaning, while only 1% had this profession before displacement. Of the respondents interviewed in **Bern**, only 3% of women were working in the domestic/cleaning sector prior to displacement, compared to 26% currently. The same is true for the hospitality and catering sector (3% of women in Ukraine, 16% of women in Bern). There were also exceptions at the overall level. For example, the proportion of respondents working as teachers was 13% both in Ukraine and 10% in Bern.

92 [OECD, EMN \(2024\). Labour market integration of beneficiaries of temporary protection from Ukraine.](#)

93 [OECD \(2023\). What we know about the skills and early labour market outcomes of refugees from Ukraine.](#)

94 [Eurofound and the European Union Agency for Fundamental Rights \(2023\). Barriers to employment of displaced Ukrainians.](#)

Illustrative Case study 2

Ukrainian man's experience of precarious working conditions in Poland

Maksym* studied medicine and worked as a paramedic. He then moved from his hometown to Kyiv, where he lived with his wife and children. In Warsaw, he has reunited with his wife and children and has temporary protection status. Polish people helped him and his family in the beginning. Through social connections he was able to find an apartment with good conditions in Warsaw. His landlord even returned part of the money they were paying for rent. They negotiated the price with the landlord and continue to rent the same apartment.

In the beginning, it was difficult to find work. He spent the first two months working on a construction site. The company was registered in Poland, but the construction work was carried out in Germany. They were working bi-weekly. Leaving on Sundays, driving to Germany and working Monday to Friday and sometimes also Saturday. Then they travelled back to Poland. He was paid in cash immediately after finishing the work.

In Germany they stayed at a hostel. The conditions were okay. They worked about eight hours per day. The hourly wage was EUR10 (US\$10.70). After a few weeks of work, however, the head of the company that was organizing the trips started asking the workers to cover half of the costs of the trip to Germany. Maksym quit this job after ten weeks.

He applied for a work permit and recognition of his qualifications in Poland. He has 24 years of experience in medical work. He found a job opening at a hospital in Warsaw and started the process of contracting.

In September 2023, he started working at the hospital. Despite his experience, his qualifications were not recognized and they hired him as an orderly. He was hired on a civil-law contract, not an employment contract according to the labour law. He was not aware about the reality of the work in the hospital. He works 12-hour days. Sometimes there are no breaks, if there is no time. He is paid the minimum wage, PLN4,200 (\$1,040) gross."

2PL-M-01, Warsaw, 14.02.2024⁹⁵

Insufficient awareness of labour laws and rights

Limited understanding of labour laws and rights makes it hard for individuals who fled the war in Ukraine to protect themselves from exploitation and trafficking. According to key informants interviewed for this research, Ukrainians face challenges accessing information about the law and their rights, which is exacerbated by lack of proficiency in the language.⁹⁶ This also depends on the host country's labour regulations and enforcement. Additionally, the fact that many individuals may be accustomed to the grey area of Ukraine's labour market, where jobs are often not fully compliant with labour laws. However, it was also highlighted that some people who fled the war in Ukraine are aware that their working conditions are exploitative but see no choice but to continue employment despite bad conditions.

In **Berlin** a key informant anticipated an increase in labour exploitation and labour rights violations among Ukrainians.⁹⁷ They noted that 30-40% of Ukraine's labour market operates in a grey area, with jobs not fully compliant with labour laws. The informant emphasized the need to educate Ukrainian refugees about their labour rights to prevent exploitation. A caseworker from a public employment agency highlighted that as more people who have fled the war in Ukraine entered the job market since the fall in 2022, labour law issues have increasingly come to the forefront.⁹⁸ He noted that the worst cases come from temporary work, such as the parcel delivery sector, where a lot of people are easily accommodated, and precarious working conditions prevail.⁹⁹ Wages below the minimum wage, unpaid wages, partially unpaid wages, and people being dismissed from their job easily are among labour law violations linked to temporary work.

95 This is one out of three in-depth interviews carried out with Ukrainians who experienced situations that present strong indicators of potential trafficking in persons cases. For all detailed case studies compiled as part of this project, see: UNODC (forthcoming, 2024). Op. cit..

96 1PL-K-04, 1PL-K-06, 2PL-K-01, 2PL-K-04, 2PL-K-05; 1PL-K-07.

97 2DE-K-06.

98 2DE-K-01.

99 2DE-K-01.

Illustrative Case study 3

Labour law violation in the courier industry in Berlin

“In the courier industry, workers often find themselves employed by subcontractors of major logistics companies like Amazon, Hermes, and DHL. These workers typically endure long hours—eleven to twelve hours a day, six days a week—and are paid per parcel delivered rather than per hour. This can result in absurdly low hourly wages. For instance, I recently encountered a case where a worker earned just 4 euros an hour under this scheme. Although piecework regulations are allowed in Germany as long as they meet the minimum wage, many workers are unaware of their rights. One worker approached me because he didn’t know about the minimum wage law; he realized he was underpaid only after calculating his parcel deliveries versus his earnings. Verifying the actual hours worked can be problematic, especially since electronic time records are often inaccessible to dismissed employees. Without written documentation, proving work hours becomes challenging, often leading to settlements during conciliation hearings. This situation is typical, and I have encountered numerous cases like this.”¹⁰⁰

In **Warsaw** despite the fact that through the Act on Assistance of Ukrainian Citizens, the Polish government has largely facilitated processes for Ukrainians to register, essentially putting Ukrainians on equal legal footing as Polish worker on the labour market - key informants emphasized the lack of awareness of labour rights and Polish law among Ukrainians and TCNs.¹⁰¹ What makes the situation of labour exploitation more complex in Poland is the historical context of Poland receiving persons from Ukraine as cheap labour providers and the different type of employment contracts that are issued.¹⁰²

“Many people who arrived last year did not understand the difference between regular and irregular work. Without a proper contract, individuals risk serious consequences, including deportation. In this system, it is mandatory to sign a contract and provide a copy to the employee. However, some employers fail to do this, leading to abuses such as no insurance, low wages, and other exploitative practices.”¹⁰³

Key informant, civil society, Warsaw, May 2023

“Low awareness of employment rights in Poland is a significant issue, making it easy to exploit the majority of refugees. Many refugees end up working under civil law contracts, which are governed by the civil code rather than the labor code. This distinction creates opportunities for exploitation, as these contracts often lack the protections and benefits provided by regular employment contracts.”¹⁰⁴

Key informant, UN agency, Warsaw, May 2023

The labour system differentiates between two main types of contracts, “employment contracts” and “civil-law contracts”. The first one follows the labour law, while the second one is a more flexible form of contract, subject to less stringent regulations. Civil-law contracts, contrary to employment contracts, have no set limitation in working hours, do not include mandatory benefits and leave, all parameters which are to be decided directly by the contracting parties. This poses a serious threat to the protection of Ukrainians and TCNs, who are unfamiliar with the legal environment in Poland, and have urgent needs for income-generating activities.¹⁰⁵ This point is similar to findings about the contracts used in temporary work in Germany, highlighting the risks related to flexible working contracts and lack of knowledge of rights for vulnerable populations.¹⁰⁶

It was also noted that labour exploitation in Poland is a common issue faced by migrants and also some Polish employees, but that refugees from Ukraine and Belarus are in a more sensitive situation as they can’t return to their country of origin and employers use this situation to profit from them.¹⁰⁷ Some informants in Warsaw also noted the

100 2DE-K-01

101 2PL-K-02, 2PL-K-03, 2PL-K-04, 2PL-K-05, 1PL-K-04.

102 2PL-K-05.

103 1PL-K-06

104 1PL-K-07

105 1PL-K-06, 1PL-K-07

106 1IN-K-02.

107 2PL-K-02.

prevalence of oral agreements over formal contracts.¹⁰⁸ Another informant from Warsaw emphasized the role of commercial employment agencies, who often contribute to labour exploitation and adverse working conditions.¹⁰⁹ This is further described in the recent DRC Poland Protection Monitoring Analysis Report, which notes that employment agencies “have a reputation of applying untransparent practices, offering jobs with terms which are subsequently not met and are generally very poorly paid – this being in addition to the high commission deducted from the salary.¹¹⁰ Interestingly, the DRC report stated that “level of awareness of what constitutes an exploitative practice or breach of the labour law is high among Ukrainians in Poland. Due to the necessity of generating income, particularly dire among single-headed households, in a reality with continuously increasing costs of living and diminishing humanitarian assistance people find themselves forced to accept such conditions.”¹¹¹

One informant also reported cases of employers using a “switch scheme” in **Germany** and **Poland**, hiring candidates on short term contracts, firing them quickly, before hiring someone else.¹¹²

“Leasing labour is a significant issue, with many workers hired through leasing companies. This arrangement makes it challenging to monitor compliance with labour laws, as the rules can be complex and easily exploited by employers. The primary concern is with salaries, as employers often attempt to underpay workers. Another major issue is the wrongful termination of employment contracts, which further complicates the situation for leased workers.”¹¹³

Key informant, Advice centre, Berlin, April 2023

In **Bern**, one respondent explicitly stated that she believes that discrimination in workplaces exist because companies take advantage of the fact that Ukrainians are not knowledgeable about labour law.¹¹⁴ She mentioned a case of a woman working in a construction company who was told that she needs to work 20% more than others because of the temporary protection status S but that she will receive the same amount of salary; similarly a case of a woman working 6 hours a week for 200 CHF per month working in an elderly home with employers refusing to pay her more because she receives social help.¹¹⁵

Illustrative Case study 4 Non-payment of wages in Bern

“A Ukrainian woman was supposed to work in a horse stable. She was working with horses, and she was working for a while and they tried to figure out the contract and they said, I’ll do it tomorrow. I’ll do it. And he [the boss] postponed it all the time. And at the end he said, oh you know, it’s just an internship, I’m not going to pay you. And actually she was very willing to report him and to say, hey, I’m not going to work for you. And I’m going to go to the police and they connected with the police. But from what I know, in the end, she changed Canton (district). She found another job and probably just let it go.”¹¹⁶

Distrust of authority

Fear of authority can prevent individuals from seeking remedy or reporting abuse. Key informants pointed to fear of authority as a barrier to exiting situations of exploitation and trafficking across Bern, Berlin, and Warsaw. In **Berlin**, one informant added that this fear of authority does not only play a role in the hesitancy to file complaints with official government bodies but also via NGO mechanisms.¹¹⁷ It was also noted that respect and fear of the authorities coupled with a lack of language knowledge can pose challenges in navigating bureaucratic processes.¹¹⁸ In **Warsaw** it was noted that “strength in numbers” can be helpful for people afraid to report their situation to the labour inspection office: “The ability to resolve labour issues directly depends on the employer. In some instances, individuals can address their concerns by writing a letter to the labour inspection offices. However, fear often prevents some from taking this

108 2PL-K-02, 2PL-K-04.

109 2PL-K-05.

110 Danish Refugee Council (2023). Op cit

111 Ibid.

112 1IN-K-02.

113 1DE-K-02

114 2CH-K-03.

115 2CH-K-03.

116 2CH-K-06.

117 2DE-K-07.

118 2DE-K-08.

route. When multiple employees are affected by the same labour issues within a workplace, they are more likely to collectively agree to write a letter to the inspection office, making it easier to address their concerns.”¹¹⁹ Additionally, in **Bern** one informant, who fled Ukraine herself due to the war, emphasized the impact of socialization in countries where voicing complaints was discouraged. She noted that the general perception of authorities has led to significant apprehension and anxiety associated with fines or government actions.¹²⁰ There is also an assumption that any company is in a superior position when it comes to labour disputes, contributing to individuals' hesitancy to challenge situations of exploitation.¹²¹ One informant noted barriers of reporting abuses to the police included the necessity of communicating in a foreign language and doing so in an intimidating and public setting.¹²² Additionally, another informant noted that issues reported by Ukrainians to the police, as discussed in Ukrainian groups on Telegram, often resulted in authorities being unable to take any action.¹²³

Contextual

People fleeing the war in Ukraine can become vulnerable to exploitation and trafficking due to various socio-political and economic conditions. Factors identified in this research include insecure housing, including poorly overseen private hosting, challenges in accessing legal protection, especially for Ukrainian Roma and non-Ukrainian nationals, and decreasing solidarity within host communities.

Insecure housing

People who fled the war in Ukraine face challenges accessing secure housing, which can increase their vulnerability to exploitation and trafficking. Private housing schemes, although intended as acts of solidarity, often lack proper oversight, making refugees more susceptible to exploitation by traffickers posing as well-meaning hosts, or to living in exploitative conditions. This was a particular risk at the onset of the full-scale invasion, when large numbers of refugees overwhelmed reception systems, creating gaps in protection both in the centres themselves, as well as when people were hosted in alternative private housing schemes with limited regulations in place. Vulnerabilities in some collective, state-run accommodation centres were also noted, including security concerns and inadequate living conditions. Many refugees return to these centres after encountering problems in private housing. Furthermore, dependency on employers for housing significantly increases the risk of exploitation, as refugees living on employer premises may fear losing their accommodation if they report abuse.

I. Private hosting scheme

While acknowledged as a sign of solidarity towards people fleeing the war in Ukraine, private hosting schemes can expose refugees to exploitative situations. The act of private individuals providing housing to Ukrainian refugees has generally been a positive expression of solidarity. However, in some instances, this dynamic has been misused, leading to situations where refugees are subjected to labor exploitation or sexual abuse due to their dependence on their hosts. Governments in Europe have responded to the large numbers of displaced people crossing the border from Ukraine by expanding their capacity to accommodate displaced persons. The private hosting scheme relied on the generosity of families and individuals who hosted people who fled the war in Ukraine in their private homes with financial support from their government. Key informants mentioned limited oversight and the inherent dependence of refugees on hosts for accommodation as a risk factor for abuse.¹²⁴ Oversight issues with private individuals offering accommodation to people who fled the war in Ukraine were particularly acute early on after the full-scale invasion, when the initial influx of arrivals overwhelmed reception systems.

119 2PL-K-04.

120 2CH-K-03, 2DE-K-07.

121 2CH-K-03.

122 1CH-K-09.

123 1CH-K-07.

124 2CH-K-03, 1DE-K-08; 1DE-K-03; 1PL-K-07.

“Our main train station was overwhelmed with crowds of people, and individuals were allowed to take refugees with them without any registration process. As a result, we have no record of where these refugees went or who they went with. While many people had good intentions, there were also presumably others who did not.”¹²⁵

Key informant, Neustart e.V., Berlin, March 2024

One key informant in **Berlin** recounted the overwhelmed state of the reception system, with makeshift accommodations quickly set up and NGO workers and volunteers grappling with the influx of arrivals, stating “it took the federal government three or four weeks until they really understood the magnitude of the situation. Here in Berlin, people kept arriving and the city had to deal with it somehow.”¹²⁶ This lack of registration and coordination at the main train station where refugees arrived exposed them to risks of exploitation and trafficking, including at the hands of individuals who offered accommodation.¹²⁷ This was affirmed by an assessment conducted by the German NGO Network against Trafficking in Human Beings (KOK), from the perspective of specialized counselling centres.¹²⁸ KOK also details how the Federal Government together with civil society implemented measures to reduce the risk of entering exploitative conditions in the private sphere, such as through mandatory registration and prior identity verification of the hosts.¹²⁹

Similarly, in **Poland**, key informants recalled chaotic scenes at the border.¹³⁰ An NGO worker recalled seeing many people on the border with signs offering people accommodation or free trips.¹³¹ Upon seeing a woman with a placard holding up a sign saying ‘Women and children, a free trip to Germany’ he inquired what she was doing and she told him it was not her but pointed to a man standing further away, claiming he had good intentions.¹³² Another Ukrainian key informant who herself travelled through Chelm remembered a frenzied environment, noting it was unclear for her where to seek assistance.¹³³ She saw many people at the border offering accommodation, she assumed these were people living in the Poland-Ukraine border looking for financial support from the government for hosting refugees.¹³⁴

“Poland introduced the 40+ subsidy, designed to cover meals and accommodation costs for apartment owners hosting refugees. However, this subsidy has faced significant issues. Frequently, landlords take this money as profit, still expecting refugees to pay for accommodation or not providing the promised food. There is no effective monitoring or oversight mechanism. This turned the subsidy into a business-generating scheme for some landlords. These landlords, who might also own hospitality facilities in varying conditions, rotate tenants every 120 days without fulfilling their obligations to provide proper meals and accommodation.”¹³⁵

Key informant, Danish Refugee Council Poland, February 2024

In Bern, one informant working in housing provision for refugees in the Canton of Bern, detailed that particularly in March-April 2022 they were faced with an increase of arrivals from Ukraine.¹³⁶ During this time it was not possible to thoroughly vet private individuals or families who took people in, as the social services were overwhelmed, it would have taken “two or three hundred employees to carry out this audit.”¹³⁷

125 2DE-K-08.

126 2DE-K-07.

127 2DE-K-08, 2DE-K-09, 2DE-K-07, 2DE-K-10.

128 KOK (2022). [Trafficking in Human Beings and Exploitation in the Context of the Ukraine War](#).

129 Ibid.

130 2CH-K-01, 2P-K-01, 2PL-K-06.

131 2P-K-01.

132 2P-K-01.

133 2CH-K-01.

134 2CH-K-01.

135 2PL-K-05.

136 2CH-K-05.

137 2CH-K-03.

Illustrative Case study 5 Forced labour on a farm in Bern

A Ukrainian couple, Olga* - a woman in her mid-fifties and her 60-year-old husband Vitalii* who has a disability, were accommodated with a host family on a farm. The host family asked Vitalii to feed the animals (cattle, pigs) and work on the farm. They asked Olga to take the children to kindergarten and to work as a nanny. Olga and Vitalii were not paid for their work, and they lived on the farm for seven months. Vitalii's physical health deteriorated and he had to have surgery. When Olga and Vitalii moved out of the farm, the host family hired two professionals to work on the farm. The host family received money from the state for hosting them. Olga and Vitalii found another place to live. At the time of the interview, they were dependent on social assistance, as Olga does not speak German and Vitalii is constrained because of his disability.

Case described by a key informant who supported the victim.¹³⁸

Despite challenges, informants also noted positive outcomes from private accommodation arrangements. A social worker assisting Ukrainians to transition to private housing in **Bern** highlighted instances where host families provided support beyond mere lodging, developing genuine friendships, and assisting refugees in finding work and integrating into their new environment.¹³⁹

II. Collective accommodation

Inadequate monitoring in collective accommodation facilities can leave vulnerable individuals susceptible to exploitation. Large collective accommodation centres in the cities where field research was conducted show signs of situations where individuals were exposed to abuse and exploitation. Risks mentioned by some informants associated with collective accommodation centres, include poor living conditions and security concerns. The wish to leave such a situation might result in negative coping mechanisms. It was also noted that when people faced issues in private accommodation, they would often have no choice but to return to the collective centres. Discrimination particularly against Roma refugees was reported, as they were allocated segregated accommodation and experience reduced access to essential services.

In **Berlin**, safety concerns, including the absence of minimum standards such as the separation of men and women were raised linked to the reception centre for refugees from Ukraine at the former Tegel Airport.¹⁴⁰ Initially, people were meant to stay there for 3-4 days in Tegel, now people stay for up to 8 months.¹⁴¹ Despite shelters being a place for refugees to find safety, informants reported various instances of sexual assault.¹⁴² Further, to accommodate the high number of people who fled the war in Ukraine in Berlin, some hostels have been rented where people reside on their own without the presence of social workers, which differs from other state-run structures receiving refugees.¹⁴³ In one shelter, social workers reported that they had received accounts they deemed credible from residents that a security guard was having sexual relations with two women and also arranging transportation for them to engage in prostitution.¹⁴⁴ In this context, the difficulty with finding qualified, suitable security personnel to work in the shelters was mentioned by informants overall.¹⁴⁵ In another instance, social workers met a highly traumatized woman in a brothel who had previously resided in a refugee reception centre but they did not know how she came from the centre to the brothel.¹⁴⁶ This could suggest that potential trafficking for sexual exploitation is occurring where women are targeted at reception centres and transported to brothels by intermediaries.

*"These mass accommodations, where the state fails to maintain a sufficient presence, become fertile ground for organized crime. Without adequate oversight, these environments are exploited by criminal elements who take advantage of the vulnerabilities within these settings."*¹⁴⁷

Anonymous key informant, Berlin, March 2024

138 2CH-K-03.

139 2CH-K-05.

140 2DE-K-07.

141 2DE-K-07.

142 2DE-K-05, 2DE-K-07.

143 2DE-K-07.

144 2DE-K-07.

145 2DE-K-07.

146 2DE-K-07.

147 2DE-K-07.

In **Bern** it was noted that the goal is for individuals to remain in collective accommodation for a short period (no more than six months).¹⁴⁸ However, due to the challenging housing market, some stay longer, which complicates their integration process. Similar to the Tegel reception centre in Berlin, conditions in the “container city” in Bern were described as very challenging: Respondents noted that social payments in the camp are 380 CHF per month (approx. 380 EUR) without food.¹⁴⁹ However, the food provided was often of very poor quality, with reports of individuals receiving as little as a single potato or apple per room, or even expired food from supermarkets.¹⁵⁰ There were reports of physical fights, sexual harassment, and lack of support by shelter employees, “no one counts you as a human being there”.¹⁵¹ This adds to the strain on an already vulnerable population: “Many moved to other countries outside of Switzerland because of this. They are mentally traumatized. There is no way to know if they are ok now.”¹⁵²

Illustrative Case study 6 **Exploitation of a girl by her father at a refugee camp in Bern**

“The father exploited his eldest daughter to take care of the family, do everything for her younger sister. The father kept the phone, money and food, according to the younger sister, who told her teacher. Social services were aware of the situation. Unfortunately, it was not a typical situation as the mother had died in Ukraine, and the son stayed in Kyiv. The father escaped from Kyiv with his daughters. [...] With the teacher and friends of the family in Kyiv, we used a child protection mechanism. We engaged the older brother to protect the sisters, because he was 18 and he took them back to Ukraine.”

Key informant interviewed in Bern in 2023.¹⁵³

A research study conducted in June 2022 by the University of **Warsaw** Trafficking Centre with women in collective accommodation centres about their sense of security, found that those interviews were “very rarely facing situations which might be considered as risky from the point of view of human trafficking. There were cases of hostility, there were cases of sexual harassment, there were cases of unpleasant behaviour but very little proof that the victimization of human trafficking was there.”¹⁵⁴ One young, female informant travelling alone from Ukraine to Poland, described feeling safer once she was staying in an official camp in Poland, thinking “if someone wanted to kidnap me they wouldn’t do it in a refugee camp.”¹⁵⁵ Similarly, one NGO worker mentioned they heard less about exploitation in collective accommodation sites, however they came across one case that could be indicative of other dynamics¹⁵⁶: at an accommodation centre for people who fled the war in Ukraine situated in a forested area near the border, where many children were not attending school. The informant’s organization observed these children working on local farms and in construction, where they were exposed to extreme temperatures and hazardous equipment.¹⁵⁷

Respondents in **Berlin** and **Warsaw** respectively pointed discrimination and prejudice against Ukrainian Roma refugees, who were sometimes not welcomed in collective accommodation sites.¹⁵⁸ An informant from Berlin specialized in issues of discrimination against Roma people recounted segregation between non-Roma and Roma refugees in the accommodation sites, and a failure by shelter staff to provide assistance to Roma refugees, including not handing out blankets.¹⁵⁹ Further, she noted that many Roma are still living in collective accommodations and that many children are not enrolled in school.¹⁶⁰

148 2CH-K-05.

149 2CH-K-08.

150 2CH-K-08.

151 2CH-K-08.

152 2CH-K-08.

153 1CH-K-11.

154 2PL-K-05.

155 2CH-K-08.

156 2PL-K-05.

157 2PL-K-05.

158 2PL-K-05, 2DE-K-04.

159 2DE-K0-4.

160 2DE-K0-4.

III. Employer-provided accommodation

Dependency on employers for housing can increase vulnerability to exploitation, particularly in cities with scarce housing. Alongside the issues of being often underpaid, working below their qualification levels, and facing lack of alternatives for income generation, the urgent need for accommodation exacerbates the vulnerability of people displaced from Ukraine, particularly when it is their employer who provides accommodation.¹⁶¹ Living on employer premises makes it difficult to take action against abusive employers due to the risk of losing housing. Several cases illustrate these vulnerabilities.

In **Berlin** one case involved a woman who paid to register her address in an apartment where she didn't live, to maintain residency in Berlin and avoid being relocated to another city in Germany; in reality she had to pay for and stay in a room in the erotic massage parlour where she worked.¹⁶² Another informant described online job portals offering employment opportunities that include accommodation, making these positions highly attractive: these advertisements target not only people already in the host country but also those still in Ukraine, promising high wages and assistance with bureaucratic processes.¹⁶³ While these offers may seem appealing initially, the reality can be quite different. Upon arrival, individuals often find that a significant portion of their wages is deducted for accommodation, they share bedrooms and pay 300-400 euros for a bed.¹⁶⁴ One informant summarized the situation as follows:

*"If a problem arises and you live in your employer's apartment, the hurdle to take action against the employer is significantly higher. This is due to the fear of being evicted from the apartment. In cities like Berlin, where housing is extremely scarce, this dependency is even more pronounced. As a result, many people do not seek help because they are afraid of becoming homeless. There have been instances where individuals were dismissed from their jobs with a week's notice and simultaneously evicted from their employer-provided housing. These individuals sometimes end up on the streets before they can find emergency shelter. This issue is relatively common in temporary work and in sectors such as cleaning, particularly in hotels."*¹⁶⁵

Key Informant, Advice centre, Berlin, March 2024

Similarly, in **Warsaw**, often employment is tied to accommodation, this situation is common in hostels, where employees' lodging is provided by the employer.¹⁶⁶ At the beginning of the crisis it was typical for hotels or hostels to offer rooms and there were a few cases of people being asked to provide cleaning services in return without any pay.¹⁶⁷

In **Bern** one informant provided insights into the situation in a village, where a lot of people work in the hotel industry and can sometimes live in the hotel room for free.¹⁶⁸ This option can be preferable for those avoiding collective accommodations, however incomes may not always be sufficient in this touristic town creating additional dependencies on the employer.¹⁶⁹

161 2PL-K-01, 2PL-K-02, 2PL-K-03, 2PL-K-04, 2PL-K-05, 2CH-K-02.

162 2DE-K-08.

163 2DE-K-01.

164 2DE-K-01.

165 2DE-K-01.

166 2PL-K-03.

167 2PL-K-04.

168 2CH-K-04.

169 2CH-K-04.

Illustrative Case study 7 Forced labour at a hotel in Bern Canton

"It was a problem at a small hotel. The owner offered a place for four or five Ukrainian women to live and then he told them that he would give them a job and that he needed their passports for the contracts. He said they would not be paid but would have a place to live and food. [...] We engaged the local government to resolve the situation. In fact, this man did not pay anything for the whole summer season. [...]"

One of the women found me on WhatsApp, we discussed the situation, and then I went to [...] meet with the owner of this hotel and we had a heated argument. He said that he takes care of this woman, it was an agreement amongst themselves and that it was at this woman's request that she was not paid. She did not know that they could receive social welfare payments. [...] The woman thought it was normal and then was in shock. She worked in the hotel in housekeeping without a contract. [...]"

After I talked to him, he returned the passport and permit to her when we clarified it. Then we clarified to this woman that she has a right to social welfare payments. [...] She did not get an employment contract until 1-2 weeks after this, then she left the place. There were two women working in the kitchen, two in housekeeping and one older woman who did not work. Five women and he took all their passports."

Case described by a key informant who supported the victim¹⁷⁰

Challenges accessing temporary protection status

Challenges with accessing temporary protection status, and the related residency rights, working rights and social support, can be a risk factor. Key informants from **Bern, Berlin, and Warsaw** provided insights into challenges with legal status encountered by people fleeing the war, which particularly impacts non-Ukrainian Third Country Nationals (TCNs) and Ukrainian Roma communities. Additionally, bureaucratic hurdles were highlighted particularly in **Warsaw** for people arriving without documents, people from the Occupied Territories and people who lost their temporary protection status while travelling back and forth to Ukraine. These challenges might be more pronounced in Warsaw due to larger numbers of people engaging in circular migration between Western Ukraine and Warsaw and the initial overwhelm of the administrative system due to large numbers of arrivals.

I. Non-Ukrainian Third Country Nationals

Key informants across Bern, Berlin, and Warsaw shed light on the difficulties non-Ukrainian TCNs fleeing Ukraine face in accessing legal status in host countries. This echoes early reports on risks of exploitation and trafficking linked to the war in Ukraine. Several participants of a roundtable organized in 2022 voiced concerns that the "EU's visa-free approach is exclusionary" denying non-Ukrainians TCNs fleeing the war legal channels for travel and potentially heightening their vulnerability.¹⁷¹

In **Berlin**, one informant highlighted how this can expose people to risks in the labour market as they seek work quickly: they initially receive a residence permit and work permit valid for only six months and sometimes up for a year, but after this period they have to transition to a difference residence status such as a longer-term work visa for which they need to show employment.¹⁷² For example, two Thai women who fled Ukraine received assistance from a Thai NGO in Berlin: both women had worked in massage parlours in Ukraine and were married to Ukrainian men.¹⁷³ One woman's husband had already moved to Germany, allowing her to join him and obtain immigration status based on his.¹⁷⁴ The other woman came alone because her husband was unable to leave Ukraine due to martial law. After approximately two years on a 'tolerated stay' permit, she received an order to leave Germany.¹⁷⁵

170 1CH-K-11.

171 Cockbain, E., Sidebottom, A. (2022). [The war in Ukraine and associated risks of human exploitation and trafficking](#).

172 2DE-K-01.

173 2DE-K-02.

174 2DE-K-02.

175 2DE-K-02.

In **Warsaw**, Belarusians who fled Ukraine to Poland are also in a particularly legal situation. Since July 2022, Belarusians in Poland can obtain a residence permit based on a humanitarian visa; other ways to legalize their status is a resident permit for three years and another is international protection.¹⁷⁶ It can be difficult for Belarusians seeking international protection in the EU when they traverse multiple countries on the way from Ukraine.¹⁷⁷ However the biggest challenges Belarusians face is with legal documents as Belarusian embassies and consulates stopped issuing new passports abroad.¹⁷⁸

In **Bern**, one case was highlighted where a non-Ukrainian TCN who was a suspected trafficking victim, fled from Ukraine to Switzerland and was not granted access to support under the victim assistance law or the temporary protection (S) status, due to their not being a Ukrainian national.¹⁷⁹

II. Ukrainian Roma

Ukrainian Roma who fled the war in Ukraine face stigmatization both along the journey and in accessing temporary protection. This systemic discrimination not only perpetuates hardship but can also exacerbates the vulnerability of Ukrainian Roma refugees to exploitation and trafficking, as they find themselves cut-off from social support.

In **Berlin** an informant specialized in issues of discrimination against Roma described how Ukrainian Roma experienced difficult journeys due to discrimination, such as incidents of people who didn't 'look Ukrainian' not being allowed to cross into Poland, or authorities in Germany not letting Ukrainian Roma disembark trains.¹⁸⁰ The informant links these experiences, from departure to destination, to difficulties in accessing legal status and rights.¹⁸¹ She summarized the situation as follows:

“One major issue emerged at the very beginning, primarily through Telegram groups, where rumours and fake news circulated about Roma refugees traveling among the Ukrainian refugees, who were [allegedly] not genuine war refugees. This narrative has persisted and is gradually becoming institutionalized. As a result, many [Ukrainian] Roma refugees are either denied residence permits or end up in precarious situations. We encountered a case where a family reported that all their aid was suddenly cut off, leaving them on the street, and they had to seek help through self-organized groups. This vulnerability, which began in their country of origin, continued throughout their flight and persists in Germany.”¹⁸²

Key Informant, Reporting and information centre on antigypsyism, Berlin, March 2024

In 2024, in Switzerland, similarly a media debate has emerged, which has fuelled discriminatory attitudes and reduced support for Ukrainian Roma refugees seeking S status in Switzerland.¹⁸³ The persistent discrimination against Roma people, now framed around the issue of protection status, continues to undermine their access to necessary support and protection.

III. Issues with documents, bureaucratic hurdles

Additionally, bureaucratic hurdles were highlighted for people arriving without documents, people from the Occupied Territories and people who lost their TP status travelling back and forth to Ukraine. The difficulty in obtaining proper documentation hinders access to legal status, benefits and formal employment, increasing risks of being exploited.

In **Warsaw** informants knew of Ukrainians who accidentally lost their temporary protection status which impedes access to social benefits.¹⁸⁴ This situation can occur when people travel back and forth between Poland and Ukraine, leading border guards to mistakenly believe they are entering as tourists (allowing up to 90 days of visa-free stay) rather than under temporary protection status.¹⁸⁵ It can also happen if individuals leave for more than 30 days or if an administrative process is not followed correctly, resulting in the deactivation of their temporary protection (PESEL

176 2PL-K-02.

177 2PL-K-02.

178 2PL-K-02.

179 2CH-K-07.

180 2DE-K-04.

181 2DE-K-04.

182 2DE-K-04. See also, Melde- und Informationstelle Antiziganismus / Mia. (2024). [Antiziganismus gegen ukrainische Roma-geflüchtete in Deutschland.](#)

183 2CH-K-07.

184 2PL-K-04, 2PL-K-05.

185 2PL-K-04, 2PL-K-01, 2PL-K-05.

number) in Poland.¹⁸⁶ While these are bureaucratic impediments it takes a long time to re-register in the system and receive a back payment of benefits, sometimes people even reapply but get refused and receive a different type of protection status with different benefits.¹⁸⁷

There are also cases of people arriving without documents. It is particularly difficult for persons from the Occupied Territories to have their Ukrainian documents recognized.¹⁸⁸ While there haven't been a lot of cases of people without documents one organization in Warsaw saw 3 people arriving without ID documents in the week before interview in March 2024.¹⁸⁹ The informant noted that without ID documents it is impossible to find work and this makes people vulnerable to human trafficking.¹⁹⁰ A case was noted of a man who left Ukraine in violation of the martial law and applied for temporary protection status in Germany. Since he did not have a stamp in his passport attesting that he crossed the border at an official crossing point he was asked to gather a variety of documents to prove that he was living in Ukraine before and not in another country.¹⁹¹ As this might be difficult it represents a barrier to regularizing his status.

Among the bureaucratic impediments linked to the temporary protection status also mentioned in addition to **Warsaw** in **Berlin** and **Bern** is a lack of clarity of how the TP status can be rescinded in one European country and acquired in another.¹⁹²

Illustrative Case study 8 **Sexual abuse in private accommodation in Spain, with the person fleeing to Bern, losing temporary protection status**

"A Ukrainian woman faced sexual harassment while staying with a host family in Spain. Seeking safety, she traveled to Bern, Switzerland, and stayed with another host family while re-applying for protection status. Unfortunately, her application was denied, leaving her without legal status and financial support. Her host family in Switzerland, who were not compensated, continued to shelter her for nearly a year. Eventually, she received financial assistance to return to Spain, then traveled back to Ukraine to reunite with her family. Despite efforts to secure protection in Switzerland, including support from a psychologist who deemed it safer for her to remain there, she was left without protection because she had previously refused temporary protection status in Spain."¹⁹³

Decreasing solidarity within host communities

Growing negative perceptions of Ukrainians within host communities, can increase the risk of exploitation and trafficking, as refugees are less likely to voice complaints or seek help. Some informants in **Warsaw** and **Berlin** highlighted concerns with growing discrimination and negative perceptions of Ukrainians within host communities and how it increases vulnerability to exploitation and trafficking.

In **Warsaw**, a growing perception within Polish society that Ukrainians are taking over social benefits has negatively impacted social solidarity and community dynamics.¹⁹⁴ Interviewees from DRC Poland detected issues around social cohesion in their protection monitoring activities, including a perception among locals that the arrival of Ukrainian refugees led to worse employment conditions.¹⁹⁵ Further, Ukrainians are often viewed in Poland traditionally as economic migrants, and there is a very low awareness of international law and refugee rights. As a result, much of the support currently provided to Ukrainians is seen as charity rather than a right.¹⁹⁶

186 2PL-K-04, 2PL-K-01, 2PL-K-05.

187 2PL-K-04, 2PL-K-05.

188 2PL-K-05, 2PL-K-04, 2CH-K-04.

189 2PL-K-04.

190 2PL-K-04.

191 2PL-K-01.

192 2PL-K-04, 2DE-K-06.

193 2CH-K-07.

194 2PL-K-03, 2PL-K-05.

195 2PL-K-04.

196 2PL-K-05.

“Interviews revealed that people felt they should be grateful for any support or work they receive. Complaining could create more tensions within the community, leading to potential backlash not just against individuals but against the entire community. This situation is perceived as a community-level risk, not just an individual one.”
Key informant, Danish Refugee Council Poland, February 2024

Similarly, two informants in **Berlin** noted issues related to hate speech and discrimination, with one informant detailing how this can increase vulnerability to exploitation:

“The growing hostility towards Ukrainians in society, especially on social media, creates a deep sense of insecurity. This fear can lead you [Ukrainian people] to accept poor working conditions and extra hours. You don’t feel safe enough to demand better work conditions. You may start to feel undeserving of anything better and convince yourself to be grateful for whatever you receive.”¹⁹⁷

Key informant, Vitsche e.V., Berlin, April 2024

5.2 Resilience factors

Social support networks within community including communication channels

Social support networks within the Ukrainian community can serve as a factor of resilience to risks of exploitation and trafficking. The significance of knowing people in the destination city, who provide a sense of familiarity and support when navigating employment and housing options was emphasized by multiple key informants.¹⁹⁸

In **Berlin**, it was mentioned that social networks can help facilitate exit from exploitative situations: “In a few cases, the best we could do was connect people from that city in Germany with local Ukrainians who spoke both German and Ukrainian. Thanks to our networking with other Ukrainian organizations, we were able to facilitate these connections. This support enabled the individuals to go to the police and file a case for investigation.”¹⁹⁹ This was also the case when suddenly many people were coming to an advice centre on labour law issues in Berlin from the same company, as one individual informed them where to seek help.²⁰⁰ Similarly, in **Warsaw** it was noted that social networks can also give guarantees that someone is a good employer.²⁰¹ It was also highlighted that when multiple employees affected by the same labour issues are able to unite, they are more likely to overcome their fear and collectively report their concerns to the labour inspection office, making resolution easier.²⁰²

One informant in **Bern** remarked on dissemination of preventative material online within the Ukrainian community, enabling individuals to learn about potential situations of exploitation:

“I was amazed at the resilience of the Ukrainian community and how they found and supported each other through the diaspora. The sense of solidarity was incredibly strong. We had a Telegram channel where our Ukrainian employee posted information about human trafficking, sexual exploitation, labour exploitation, as part of our prevention efforts. The community’s reaction was immediate. They actively shared advice, such as avoiding specific Facebook job offers and profiles of individuals known to be exploitative. This mutual support network was crucial in protecting vulnerable individuals from exploitation.”²⁰³

Key informant, Act 212, Bern, February 2024

The key informant emphasized that she believed that all those with community support and connections, whether Swiss or Ukrainian, were better protected.²⁰⁴

197 2DE-K-10.

198 2DE-K-03, 2DE-K-09, 2DE-K-10, 2DE-K-09, 2CH-K-06, 2PL-K-05.

199 2DE-K-06.

200 2DE-K-01.

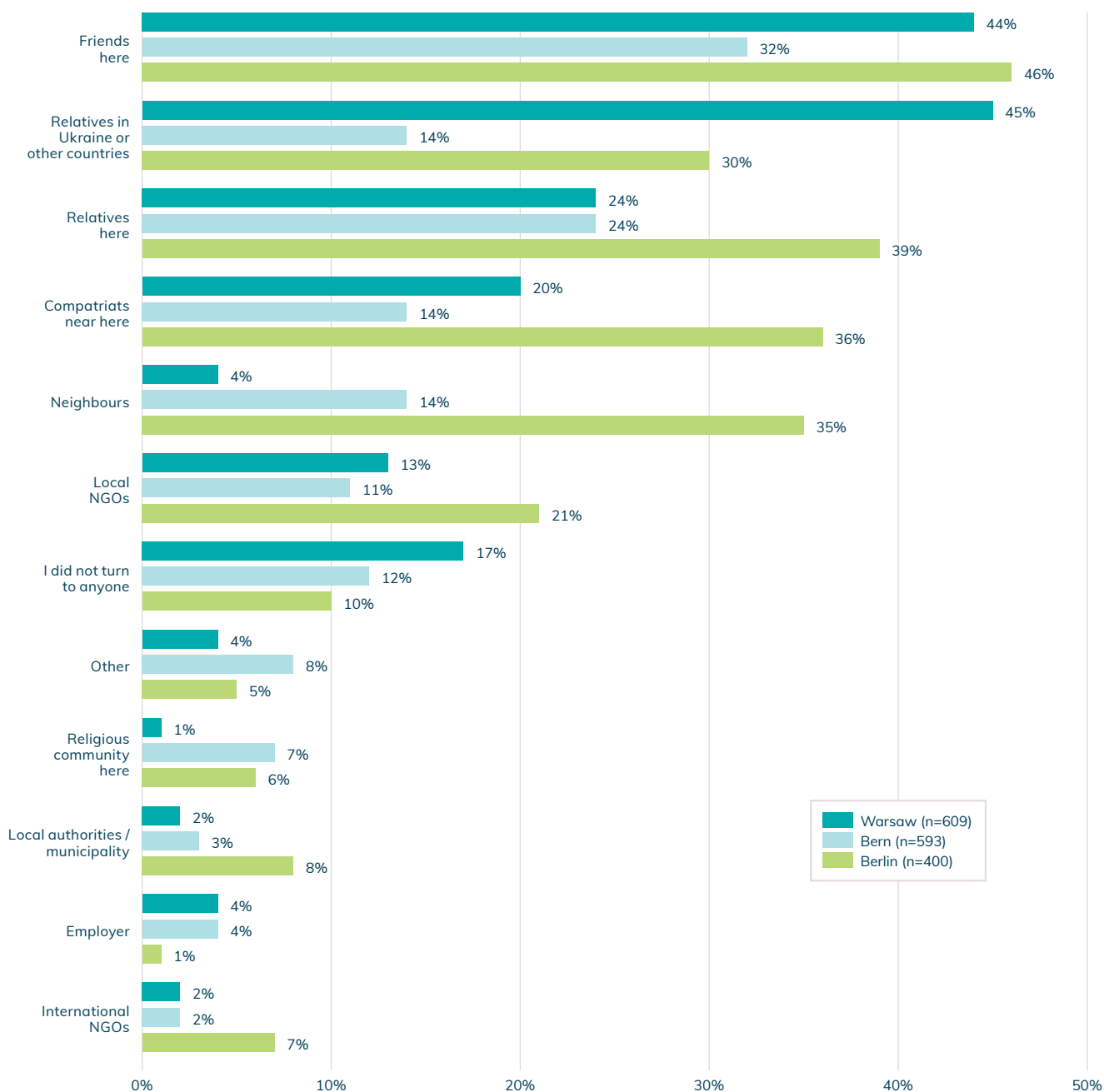
201 2PL-K-05.

202 2PL-K-04.

203 2CH-K-06.

204 2CH-K-06.

Figure 6. When you need support, who do you turn to?



The crucial role played by social networks in information sharing and assistance was highlighted by survey respondents in Berlin, Bern and Warsaw.²⁰⁵ In **Berlin**, when in need of support, survey respondents most often turn to friends (46%), relatives nearby (39%) and compatriots (36%) they know. In **Warsaw**, friends (44%), relatives in Warsaw (24%), in Ukraine or elsewhere (45%) and compatriots nearby (20%) are the main support networks mobilized both by interviewees. In **Bern** most respondents reporting turning to friends (44%) and relatives (24%).

Visa free travel and temporary protection status

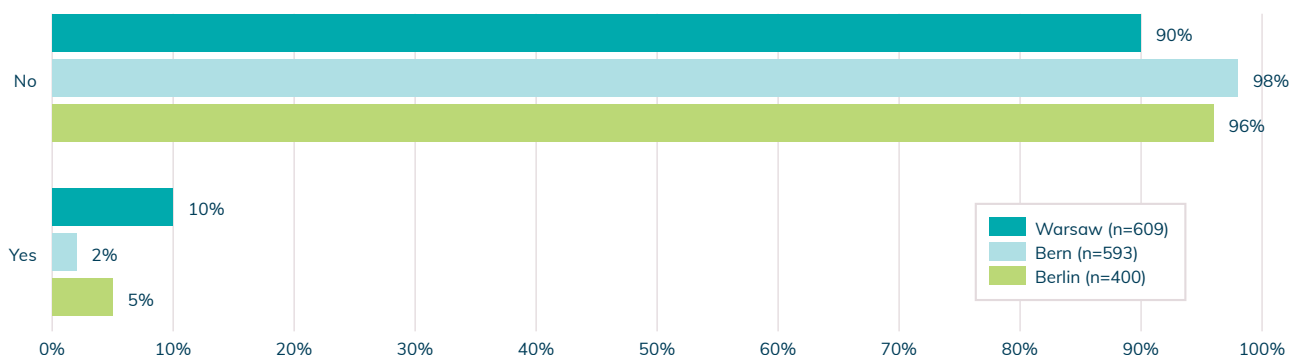
Rapid access to legal status, coupled with access to social security and the labour market, emerged as the fundamental protective factors against human exploitation and trafficking. The availability of visa-free travel significantly reduces the likelihood of smuggling and human trafficking by providing safe and legal routes for refugees.

²⁰⁵ See findings from the same survey previously published in MMC briefing paper series [Displaced from Ukraine to Bern](#), [Displaced from Ukraine to Berlin](#), [Displaced from Ukraine to Warsaw](#).

Additionally, having rapid access to a legal status ensures access to social benefits, employment opportunities, and increases the likelihood of accessing protection under the law, all of which are crucial in mitigating the risks of exploitation.²⁰⁶

I. Visa free travel and low journey costs

Figure 7. Did you pay anyone to provide transportation or documents to cross the border illegally during your journey?



Smuggling from Ukraine to Europe is almost non-existent, thanks to visa-free travel for Ukrainians.²⁰⁷ The large majority of respondents across all three cities did not pay for any services to cross the border illegally (See Figure 7). Among respondents interviewed in **Berlin**, less than 5% of respondents resorted to paying anyone (in cash or by other means) to have access to transportation or get documents to cross the border illegally during this journey. In **Bern**, 98% of all respondents reported that they had not used a smuggler nor had to pay anybody to cross a border illegally. As in Berlin and Bern, the prevalence of respondents in **Warsaw** who paid for services to leave Ukraine illegally is very low. In Warsaw, 90% of respondents reported they had not paid anyone to provide transportation or documents to cross the Ukrainian border irregularly during their journey.

In **Berlin**, half of respondents reported not having to pay anything for their journey to Berlin, which can be explained by the numerous humanitarian evacuation convoys and mechanisms organized since the beginning of the invasion. For those who paid, Ukrainian nationals reportedly paid less than non-Ukrainian TCN: the median amount spent by Ukrainians was around 200 euros, while it was around 300 euros for other TCN. Slightly more than half of respondents paid for their journey to **Warsaw**, with a median total amount of 98 euros (among respondents who paid for their journeys), TCNs reportedly paid more than Ukrainians (median of 181 euros for TCNs vs. 86 euros for Ukrainians), and men paid slightly more than women. Among the respondents surveyed in **Bern** who had to pay and could remember how much they paid, the median amount paid was 200 euros.

Key informants highlighted that legal travel routes from Ukraine to Europe significantly reduce the chances of exploitation and trafficking. However, certain groups, such as Ukrainian Roma, individuals with disabilities, some women and children, people travelling from Eastern Ukraine and men prohibited from exiting Ukraine under martial law, face more difficult journeys and increased vulnerabilities. As one informant noted, legal migration routes are the best preventive measure against human trafficking, as they minimize dependencies and opportunities for exploitation.

“As far as the routes are concerned, it is simply our experience that legal migration routes are the best preventative way to stop human trafficking. That simply means that far fewer dependencies could arise.”²⁰⁸

Key informant, Fachstelle Frauenhandel und Frauenmigration, Bern, March 2024

206 1DE-K-02; 1DE-K-07; 1DE-K-09; 1DE-K-09; 2DE-K-02; 1PL-K-01; 1PL-K-04; 2CH-K-07.

207 See also findings from the same survey previously published in MMC briefing paper series [Displaced from Ukraine to Bern, Displaced from Ukraine to Berlin, Displaced from Ukraine to Warsaw](#).

208 2CH-K-07.

II. Temporary protection

The factor of resilience to exploitation and trafficking mentioned most by key informants was the easy access to legal status and related social security benefits and the job market under the Temporary Protection Directive.²⁰⁹

In **Berlin**, interviewees emphasized the access to the job market and social benefits afforded to Ukrainian refugees, highlighting that immediate access to work and social support can result in reduced susceptibility to exploitation.²¹⁰ The simplified bureaucratic process for obtaining residence status, access to social benefits was also mentioned.²¹¹ Further, it was noted that the prioritization of Ukrainians over other foreign applicants in job centres and the provision of basic security benefits, contributed to their resilience in the face of economic challenges.²¹² In **Bern**, the advantages offered by the status S²¹³ in the Swiss asylum system were highlighted, which facilitate access to housing, employment, and social support.²¹⁴ Key informants in **Warsaw** further underscored the advantage of legal status in providing Ukrainian refugees with the ability to leave abusive work situations without losing their residence status. Compared to other groups, Ukrainian refugees have greater freedom to seek alternative employment, reducing their vulnerability to severe labour exploitation.²¹⁵

Anti-trafficking responses adopted by national/local authorities, civil society

Gradually, throughout the course of 2022 and beyond, anti-trafficking stakeholders from the NGO sector, local and state authorities, and regional and international organizations mobilized a large-scale and comprehensive anti-trafficking response. The following information on anti-trafficking responses adopted in response to large-scale displacement from Ukraine is derived directly from interviews with key informants. While not comprehensive list of all measures implemented, it provides insight into how these measures may have contributed to prevention efforts:

Berlin

- Flyers and brochures in multiple languages (German, English, Ukrainian) were distributed at key locations like train stations, warning of human trafficking and providing support contacts.
- A Ukrainian-led organization quickly created a website with critical information in Ukrainian and German, initially outpacing information provided by official German government sites.
- Early on, issues around human exploitation and trafficking were consistently raised in NGO network meetings on the protection of Ukrainian refugees.
- Numerous advice centres in Berlin provide support and guidance to refugees, helping to mitigate trafficking risks.
 - Projects like Hidna Pratsya Berlin, funded by the Berlin Senate, advise Ukrainian refugees on labor and social rights.
 - A dedicated organization provides legal support to TCNs who fled Ukraine.
- A project with DRC and diaspora organizations focused on spreading awareness of protection risks, including human trafficking and hate speech, through digital campaigns.

209 2DE-K-01, 2DE-K-03, 2DE-K-05, 2CH-K-06, 2CH-K-07, 2PL-K-05.

210 2DE-K-05.

211 2DE-K-03.

212 2DE-K-01.

213 Switzerland is not bound by the EU Temporary Protection Directive. However, Switzerland is granting temporary protection to refugees from Ukraine. They do not have to go through an asylum procedure, but are granted protection status S in a fast-track procedure.

214 2CH-K-06.

215 2PL-K-05

Warsaw

- Informational leaflets in multiple languages (English, Polish, Ukrainian) warning about trafficking risks were distributed at borders and accommodation centres, providing contact information for support services.
- Support centres and consultation points in Warsaw offer a wide range of services:
 - A Ukrainian organization, among other services, provided information on trafficking-prevention and services such as verifying private hosts, and now assists with labour market integration through services such as reviewing Polish contracts, helping individuals to contact the labour inspectorate.
 - An NGO runs workshops for Ukrainian women on finding legal work.
 - Another NGO, initially focused solely on Belarusians, operates a hotline for refugees and migrants, addressing issues like labour exploitation and connecting callers to relevant partners.
- A DRC Ukraine project expanded a legal aid platform, adding Polish content.
- Blue Dot Support Hubs evolved into community centres offering services like mental health support, legal aid, and information provision, focusing on community-based protection and social cohesion.

Bern

- Increased campaigns and political attention focused on human trafficking, with initiatives from organizations like IOM and Fedpol (Swiss Federal Police Office).
- Posters and materials in collective accommodation centres raised awareness about human trafficking.
- A national anti-trafficking hotline translated their webpage and forms into Ukrainian and provided translation services for calls.
- Organizations enhanced their online presence, engaging potential victims via social media platforms like Facebook and Telegram:
 - An anti-trafficking NGO used a Telegram channel to post information on trafficking and flagged dubious job offers for prevention.
 - Another anti-trafficking NGO implemented a significant outreach project in Ukrainian-specific online communities, raising awareness on the concept of human exploitation and trafficking and the services available.
- A Ukrainian refugee, now residing in Switzerland established a hotline with seven phone numbers for people with disabilities, providing assistance and advice.

6. Recommendations

The below recommendations draw from the analysis of research findings, as well as from interviews with key informants.

Information campaigns and education

- Implement targeted information campaigns in Ukraine to prepare refugees for the realities of life in different European countries, tailored to different populations, addressing the specific needs of vulnerable groups.
- Leverage platforms like Telegram and Facebook to disseminate crucial information in host countries in relevant languages (i.e. Ukrainian, Russian) about risks of human exploitation and trafficking, particularly in the labour market, and available support services. Regular updates and active engagement on these platforms can help prevent exploitation by informing refugees of potential risks and how to avoid them. Specific recommendations include:
 - Implement a multi-stage digital information campaign in host countries focusing on labour rights and the labour market. Initial phases could briefly inform refugees of their rights, followed by more detailed educational materials in subsequent stages. This iterative approach ensures that the information is thoroughly understood and retained by the target audience.
 - Work with social media platforms to take down content that spreads misinformation.
- Conduct educational meetings, webinars, and consultations in the main native languages of people who fled Ukraine to provide comprehensive information about their rights, labour laws, and available support services.

Enhancing accessibility to support services

- Enhance integration support by ensuring that refugees receive the necessary assistance upon arrival, helping them navigate the social support system and access available benefits without delay. This support should be tailored to meet the varied needs of different demographic groups, such as elderly individuals and those with disabilities, as well as Ukrainian Roma.
- Increase accessibility to legal and social services by providing resources and translators in local administrative offices, ensuring that people who fled the war in Ukraine can easily access and understand the support available to them.
- Improve communication and collaboration between social workers and Ukrainian community leaders who understand the unique needs and situations of Ukrainian refugees, including Ukrainian Roma refugees. Specific recommendations include:
 - Encourage the use of community leaders and well-integrated individuals to lead integration efforts and create community groups that can provide mutual support and share critical information.
- Establish user-friendly, country-specific websites in Ukrainian and Russian for reporting potential situations of exploitation and filing complaints. The site should streamline the process, translating reports into relevant languages and ensuring follow-up by relevant authorities.

Facilitating employment opportunities

- Streamline the recognition of Ukrainian qualifications and provide vocationally oriented language courses to help refugees find employment that matches their skills. This can prevent the waste of skilled labour and facilitate smoother integration into the workforce. Specific recommendations include:
 - Implement internship programs that allow Ukrainian refugees to demonstrate their skills and gain local work experience. Pair these internships with language training, where a team leader fluent in both German and Ukrainian can mentor a small group of refugees, helping them integrate into the workforce while continuing to learn the language.
 - Develop programs specifically designed to integrate Ukrainian skilled workers, providing support structures, including language courses tailored to professional jargon, to ensure successful adaptation and employment.

Addressing the need for secure accommodation

- Extend and expand temporary accommodation programs to prevent gaps in housing support and collaborate with foundations and other organizations to secure long-term solutions for those at risk of becoming homeless.
- Organize collective accommodation sites into smaller, manageable units, each overseen by a dedicated person who is responsible for hiring security staff and catering services. This approach can improve oversight within each unit, ensuring better living conditions and security for the residents.
- Establish a system for recording and addressing complaints in multiple languages within collective accommodation sites. Organizations should deploy staff or volunteers who speak the refugees' languages to regularly visit shelters and actively solicit feedback.
- Establish a monitoring and reporting mechanism for people hosted through private accommodation schemes.

Specific needs and vulnerabilities

- Implement better screening procedures at borders for people who can be potentially more vulnerable to exploitation, such as women with disabilities leaving Ukraine.
- Develop specific support measures for Ukrainian Roma who face additional barriers and discrimination in accessing protection and social services.
- Develop specific support measures for non-Ukrainian TCNs who fled Ukraine, ensuring they have access to documentation, a legal status in host countries, support and social services.

7. Conclusion

The ongoing conflict in Ukraine has precipitated a significant displacement crisis, bringing to the fore heightened vulnerabilities to exploitation and trafficking among those fleeing the war. This study, drawing on comprehensive data from surveys and key informant interviews conducted between 2022 and 2024, provides critical insights into the dynamics of exploitation and trafficking affecting people who fled the war in Ukraine in Berlin, Bern, and Warsaw.

The research underscores that multiple factors intersect to heighten the vulnerability of refugees fleeing Ukraine to exploitation and trafficking. The surveys collected from Berlin, Bern, and Warsaw reveal a prevalence of labour law violations and exploitative working conditions, with many refugees experiencing deceit, being underpaid or not paid for their work, and working under unsafe/strenuous conditions. The higher number of reported cases in Warsaw, followed by Berlin and Bern, highlights the need for location-specific interventions.

The findings underscore financial pressure, limited access to decent work, issues in securing decent accommodation and distrust of authorities being significant vulnerability factors. In cases where refugees have precarious legal status and face bureaucratic hurdles, especially for refugees without adequate documentation or temporary protection status, this can further exacerbate their susceptibility to exploitation and trafficking.

Conversely, the research highlights key resilience factors such as robust social support networks, visa free travel for most who fled the war, and rapid access to the legal protections afforded by the EU's Temporary Protection Directive, complemented by a strong anti-trafficking response. In addition, the initial strong political and societal support for Ukrainian refugees seems to have been instrumental in mitigating some of the risks, although the sustainability of this support remains uncertain.

Ultimately, the protection of these vulnerable populations is not only a moral imperative but also a societal benefit. Ensuring their safety and well-being fosters greater social cohesion and stability, contributing to the overall resilience and prosperity of the host communities as a whole. The positive lessons learned from this displacement crisis and related anti-trafficking efforts should inform future responses, ensuring that the international community is better prepared to protect those most at risk.

Annex 1. List of key informant interviews

Bern (19)

Code	Name, organisation	Type of individual, organisation	Date
2CH-K-01	Anonymous	NGO	30.01.2024
2CH-K-02	Anonymous	Ukrainian social worker	30.01.2024
2CH-K-03	Ukraine Schweiz Bern	NGO	31.01.2024
2CH-K-04	Anonymous	Ukrainian social worker	1.02.2024
2CH-K-05	Asyl Beo	NGO	21.02.2024
2CH-K-06	Act212	NGO	29.02.2024
2CH-K-07	FIZ – Fachstelle Frauenhandel und Frauenmigration	NGO	27.03.2024
2CH-K-08	Anonymous	Ukrainian refugees	20.03.2024
1CH-K-01	Bern Municipal Police	Local authority	20.04.2023
1CH-K-03	Anonymous	Transit centre	20.04.23
1CH-K-04	Anonymous	Civil society	19.04.2023
1CH-K-05	Anonymous	Civil society	26.04.2023
1CH-K-06	Anonymous	NGO	26.04.2023
1CH-K-07	Anonymous	Asylum centre	21.04.2023
1CH-K-08	Anonymous	NGO	21.04.2023
1CH-K-09	Asyl Beo	NGO	24.04.2023
1CH-K-10	Anonymous	Psychologist	21.04.2023
1CH-K-11	Feranya	NGO	21.04.2023
1CH-K-12	Anonymous	Federal authority	27.04.2023

Warsaw (15)

Code	Name, organisation	Type of individual, organisation	Date
2PL-K-01	Salvation Army	NGO	14.02.2024
2PL-K-02	Belarus Youth Hub	NGO	15.02.2024
2PL-K-03	Polish Migration Forum Foundation	NGO	15.02.2024
2PL-K-04	Ukraiński Dom	NGO	16.02.2024
2PL-K-05	Danish Refugee Council Poland	NGO	20.02.2024
2PL-K-06	University of Warsaw	Academia	27.02.2024
1PL-K-01	Anonymous	Expert, Analyst	3.05.2023
1PL-K-02	University of Warsaw	Academia	4.05.2023
1PL-K-03	Texty	Journalism	24.04.2023
1PL-K-04	Instytut Spraw Publicznych ISP	Research	6.12.2022
1PL-K-05	Belarus Youth Hub	NGO	27.06.2023
1PL-K-06	Anonymous	NGO	5.05.2023
1PL-K-07	Anonymous	International organization	6.05.2023
1PL-K-08	Anonymous	N/A	5.05.2023
1PL-K-09	Free Belarus Centre	Civil society organization	26.06.2023

Berlin (21)

Code	Name, organisation	Type of individual, organisation	Date
2DE-K-01	BEMA	Advice center	6.03.2024
2DE-K-02	Ban Ying	NGO	12.03.2024
2DE-K-03	Minor	Research	12.03.2024
2DE-K-04	Melde- und Informationsstelle Antiziganismus	Information centre	13.03.2024
2DE-K-05	Anonymous	NGO	13.03.2024
2DE-K-06	Ukraine Dim e.V.	NGO	13.03.2024
2DE-K-07	Anonymous	NGO	14.03.2024
2DE-K-08	Neustart e.V.	NGO	20.03.2024
2DE-K-09	Terre des Femmes	NGO	5.04.2024
2DE-K-10	Vitsche	NGO	9.04.2024
1DE-K-01	Anonymous	NGO	26.04.2023
1DE-K-02	Anonymous	Advice center	26.04.2023
1DE-K-03	Ban Ying	NGO	27.04.2023
1DE-K-04	Anonymous	NGO	28.04.2023
1DE-K-05	Anonymous	PhD student	27.04.2023
1DE-K-06	Solwodi	NGO	7.12.2022
1DE-K-07	Anonymous	Local authority	28.04.2023
1DE-K-08	Anonymous	Federal authority	4.05.2023
1DE-K-09	BEMA	Advice center	25.04.2023
1DE-K-10	Workshop with enumerators	N/A	31.03.2023
1DE-K-11	Anonymous	Ukrainian NGO	18.05.2023

International (21)

Code	Name, organisation	Type of individual, organisation	Date
1IN-K-01	Anonymous	Journalism	3.05.2023
1IN-K-02	Anonymous	International organization	16.05.2023



MMC is a global network engaged in data collection, research, analysis, and policy and programmatic development on mixed migration, with regional hubs in Africa, Asia and the Pacific, Europe and Latin America, and a global team based across Copenhagen, Geneva and Brussels.

MMC is a leading source for independent and high-quality data, research, analysis and expertise. MMC aims to increase understanding of mixed migration, to positively impact global and regional migration policies, to inform evidence-based mixed migration responses for people on the move and to stimulate forward thinking in public and policy debates on mixed migration. MMC's overarching focus is on human rights and protection for all people on the move.

MMC is part of the Danish Refugee Council (DRC).

For more information visit:

mixedmigration.org and follow us at [@Mixed_Migration](https://twitter.com/Mixed_Migration)

